

## APPENDIX 1

### Consultation on the West Berkshire Local Plan Review 2022-2039 under Regulation 18

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## 1. Bodies and Persons Consulted

Opportunities for statutory bodies, other organisations and local residents and businesses to be involved in the preparation of the Local Plan is provided by Regulation 18 of the 2012 Regulations.

Regulation 18 (2) (a) specifies that ‘specific consultation bodies’ that the Council consider may have an interest in the context of the Local Plan should be notified of its intended preparation and invited to make representations on what it ought to contain. The ‘specific consultation bodies’ that were notified and invited to make comment on the LPR are as set out in Appendix A of the [Statement of Community Involvement](#) (SCI). These bodies are all included on the Council’s Planning Policy consultation database.

Regulation 18 (2) (b) specifies that other ‘general consultation bodies’ that the Council considers appropriate be notified of the subject of a Local Plan and invited to make representations on what it ought to contain. These are defined in Regulation 2 (1) of the 2012 Regulations as:

- Voluntary bodies some or all of whose activities benefit any part of West Berkshire;
- Bodies representing the interests of different racial, ethnic or national groups in West Berkshire;
- Bodies representing the interests of different religious groups in West Berkshire;
- Bodies representing the interests of disabled persons in West Berkshire;
- Bodies representing the interests of business in West Berkshire.

The various ‘general consultation bodies’ consulted on the LPR are also listed in Appendix A of the SCI.

Regulation 18 (2) (c) requires the Council to consider which residents and persons carrying on business in the District are appropriate to be notified of the subject of the LPR and invited to make representations on what it ought to contain. The Council’s Planning Policy consultation database contains a list of all those individuals who have expressed an interest and/or made comment during plan preparation. Each individual has been notified of subsequent consultations. There are approximately 2000 “active<sup>1</sup>” individuals, organisations and businesses on the Planning Policy consultation database.

Bodies and persons on the Planning Policy consultation database have been notified and invited to comment on draft documents published at particular stages of plan preparation – as detailed in subsequent sections. The method of notification has primarily been by email or letter when no email address is available. Copies of documents have not been provided as a matter of course but the notification has advised:

- Where documents can be viewed and downloaded from the Council’s website;
- Where paper copies of documents can be viewed; and
- Email, telephone and postal contact details to obtain further information.

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<sup>1</sup> “active” consultees are those who have confirmed that they wish to be kept in contact regarding the plan making process since 2017 when the Planning Policy consultation database was last reviewed.

## **2. Keeping People Informed**

We keep people informed about the overall progress of the LPR in a variety of ways, such as e-mail updates to those on the Planning Policy consultation database and updates on our web based Planning Policy blog. We also produce a LPR bulletin, distributed via email. This provides updates on key milestones, factual updates on the LPR and links to finding further information.

Officers have also met with parish and town councils on request to provide updates on the progress of the LPR and to answer questions. These meetings have included ones with Bradfield, Bucklebury, Holybrook, Newbury, Shaw-cum-Donnington, Stanford Dingley and Thatcham Councils.

## **3. Scope and content of the LPR – February 2018**

Between 12<sup>th</sup> February and 26<sup>th</sup> March 2018 the Council invited comments from the public on the proposed scope and content of the LPR by publishing a Local Plan Review Scoping Report. Comments were also invited on the accompanying Sustainability Appraisal (SA) Scoping Report. All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and invited to comment. The notification letter is attached in Annex A.

The consultation documents were published on the Council's website and were also available to view at the Council's Market Street offices in Newbury.

In all, there were 81 respondents to the consultation with some respondents commenting on all questions and others only commenting on those questions of specific interest to them. The detailed feedback received and information on the next steps the Council would take are contained within the LPR Scoping Report Consultation Statement which is included in Annex B.

## **4. Regulation 18 Consultation – November 2018**

The Council undertook a second round of consultation between 9<sup>th</sup> November and 21<sup>st</sup> December 2018 seeking views on its proposed:

- Vision for the Local Plan Review
- Revision of the existing spatial areas
- Methodology for reviewing the existing settlement hierarchy
- Criteria for the settlement boundary review
- Update of the assessment of existing Local Plan policies

This took into account revised national policy as set out in the revised National Planning Policy Framework that was published in July 2018 and the revisions made to parts of the National Planning Policy Guidance.

All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and invited to comment. The consultation document was published on the Council's website and was available to view at the Council's offices in Market Street, Newbury. The notification letter is attached in Annex C

In all there were 123 respondents to the consultation with some commenting on all questions and others only commenting on those questions of specific interest to them.

There were 438 comments made in total. A consultation statement was published in June 2019 setting out the feedback received and the next steps the Council would follow and this is set out in Annex D.

## **5. Town/Parish Councils and Neighbourhood Planning Groups Stakeholder Events - February 2020**

In February 2020 the Council undertook a series of stakeholder events with town/parish councils and neighbourhood development plan groups across the District as follows:

- Monday 10 February at 10.00 in the Calcot Centre, Tilehurst
- Wednesday 12 February at 10.00 in the Council Chamber
- Thursday 13 February at 10.00 at Croft Field Centre, Hungerford

The Council sought feedback on the following:

- **Settlement Hierarchy Review** - feedback on the desktop audit of the services and facilities in each of their settlements in order to validate or correct the collated data. They were also asked to comment through a questionnaire on the relative use, accessibility and importance of the facilities and services available and those that should be improved to help sustain the settlement in the future. All councils and neighbourhood planning groups, including those that could not attend the events, were sent the desktop audits and questionnaire along with guidance notes to aid completion. The information and comments were then used in the various stages of the assessment methodology to inform the final scoring, ranking, and categorisation of the settlements into the settlement hierarchy, reflecting their role and function in the District. Further details are set out in the [Settlement Hierarchy Review Topic Paper](#) (Nov 2020);
- **Settlement Boundary Review (SBR)** - the criteria for reviewing settlement boundaries and how this work would be taken forward in conjunction with the groups themselves. This was followed up after the meeting with further written advice and maps showing existing boundaries to encourage community involvement. As far as possible the Council used the results from this exercise as a clear community steer for the way forward. Further details are set out in the [Settlement Boundary Review Background Paper](#) (Dec 2022); and
- **Housing and Economic Land Availability Assessment (HELAA)** – feedback on the assessment of sites that were submitted to the Council as part of the Housing and Economic Land Availability Assessment (HELAA).

The invitation to the stakeholder events and the follow up email seeking further comments are set out in Annex E.

## **6. Emerging Draft LPR consultation – December 2020**

In December 2020 the Council published the emerging draft version of the LPR for public consultation from 11<sup>th</sup> December 2020 to 5<sup>th</sup> February 2021. All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and

invited to comment. The notification letter is attached in Annex F. The consultation document was published on the Council’s website and was also available to view at the Council’s offices in Market Street, Newbury.

Individual Responses were received from over 700 organisations and individuals making a total of 2265 separate comments. The detailed feedback received is contained in Annexes G-K.

The main changes made to the LPR as a result of the consultation on the Emerging Draft LPR are set out in the table below. Where relevant, these include amendments as a result of changes to the evidence base and updated national guidance. Other changes have also been made to the LPR since the Emerging Draft version was published, but where these relate to matters of clarification, editorial changes or factual changes they are not listed below.

<b>Emerging Draft LPR Policy/Section</b>	<b>No of responses</b>	<b>Comments on substantive issues raised and changes made</b>
Introduction & Background	37	Detailed issues only which are picked up in Appendix G
Context	16	Detailed issues only which are picked up in Appendix G
Vision	28	Detailed issues only which are picked up in Appendix G
Strategic Objectives	31	Housing Objective amended to ensure that the LPR delivers on the vision of prioritising the delivery of housing of different types, sizes and tenures to meet local needs.
<b>Development Strategy: Our place based approach</b>		
Background	18	Detailed issues only which are picked up in Appendix H
Spatial Areas	17	Some objections to the combining of The Eastern Area and the Eastern Urban Area. In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation. This has since created challenges in delivery. In reality, combining the two existing spatial areas is more practical and gives the Council more flexibility in strategic planning terms.
SP1 Spatial Strategy	75	Amendment to the reference to neighbourhood plans to reflect the position of sites being allocated in 'some' NPAs. Main changes reflect Policy SP20 and new SP22 Town and District Centres. A significant addition to the policy refers to the rural economy, Rural Service Centres and Service Villages. The reference to new allocations within the Cold Ash NDP has been deleted, as well as allocations for Tilehurst and Burghfield and in the North Wessex Downs AONB NPAs following comments from Parish Councils. Reference made to the addition of a new DM policy relating to the separation of settlements around Newbury and Thatcham.
SP2 North Wessex Downs AONB	39	Generally supportive comments received. Requests that the Policy should be more consistent with NPPF by including the term 'great weight' in conserving and enhancing the scenic beauty of the AONB. Opposing comments that conservation of

	<p>natural beauty should not be only “primary consideration. Tackling climate change is highly important in AONB, as it will affect the landscape more permanently and generally than any major forms of development”.</p> <p>Policy makes clear that, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, the primary purpose of AONB designation is ‘to conserve and enhance the natural beauty of the area’ and is the primary consideration in assessment of all development proposals. SP5 details LPR’s approach to climate change.</p> <p>Several comments requiring a balanced approach to development by meeting government set housing targets whilst also rigorously applying AONB rules. Comments that the district needs more green space retained in urban areas, more sensitive and landscape appropriate development in the rural areas and a gentle flow from urban to rural environments. However, further comments that the policy is too restrictive in refusing major development in AONB unless exceptional circumstances as it prevents villages evolving and puts pressure on other areas of the district. For villages to remain or become viable, residential development, tourism and new rural business must be accommodated in the LPR.</p> <p>Comments noted. SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. This is set within a national planning policy context and should be read alongside all other policies in the LPR. Development proposals and planning applications will be judged against all relevant policies. Other policies explain in detail the Council’s approach to the distribution of housing, economic development and the response to climate change.</p> <p>The policy is clear that the AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities. It also makes clear that development should respond positively to the local context, conserving and enhancing local distinctiveness and sense of place and that future development will support its local communities and the rural economy.</p> <p>The North Wessex Downs AONB covers 74% of the District and the Council considers a specific policy is justified. It is notable that both Natural England and the North Wessex Downs AONB are both supportive of this approach.</p> <p>In light of increasing housing needs, comments that a greater allowance should be made for development in the AONB. For SP2 to be justified, Wey Planning Ltd for Neville Baker Estate (lpr1276) consider it essential to include a specific maximum housing requirement or target for the AONB to be line with NPPF. The policy does not set out a housing figure for the AONB. The Council’s overall approach across the whole district to identifying land for allocation is set out in Policy SP1 and SP3. Sites proposed for allocation are detailed in Policies SP13 to 15. A Housing Background Paper will be published alongside the Proposed Submission LPR. The NPPF is clear that the scale and extent of development in AONBs should be</p>
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		<p>limited and that planning permission for major development should be refused except in exceptional circumstances. The Landscape Sensitivity and Capacity Assessments that have been undertaken on sites in the AONB are published on the Council's website. In Designated Neighbourhood Areas where NDPs are allocating sites, then assessment would be undertaken as part of the NDP process. Several sites are specifically promoted through the HELAA and as AONB covers 74% of district, the Council needs to consider promoting sites for economic growth across less sensitive parts of the AONB. The Council's strategic approach to employment land will be set out in Policy SP20 of the Proposed Submission LPR. Sites allocated as part of the plan making process, whether through the LPR or NDP, will undergo a rigorous site assessment and sustainability appraisal. Thatcham Town Council (lpr1389) comments that it's unclear why maintaining remoteness is an objective for WBC in regards to AONB. Loss of accessible countryside and right-of-way access has a profound effect on residents, health and well-being should be considered more important. Strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland are some of the defining and special landscape qualities of the North Wessex Downs AONB. As a nationally designed landscape the policy is clear that that the AONB will have appropriate and sustainable growth over the plan period which conserves and enhances these qualities.</p>
SP3 Settlement hierarchy	50	<p>Amendments to the policy and supporting text have addressed consultee comments associated with infill or changes of use in Rural Service Centres and Service Villages (through the deletion of the reference to 'other development' and 'other minor development'). The supporting text was updated in relation to AWE.</p>
SP4 AWE	21	<p>The policy has been extensively reworded based on Emergency Planning's comments.</p> <p>Mixed support for Policy. Many comments recommending the Council wait for the outcome of the Judicial Review that the proposed extension of the DEPZ was subjected to as the reasoning behind the ONRs decision is vague, unclear and justified by factors which do not appear to be appropriate. The outcome of the Judicial Review was to support the position of the Council.</p> <p>Comments from the Office for Nuclear Regulation (ONR) (lpr1966) that ONR land use planning processes may apply to some developments within LPR. If the Local Authority is within an ONR consultation zone then for ONR to have no objections to such developments confirmation is required from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and that the developments do not pose an external hazard to the site. Further to this, the LPR must be updated to remove an incorrect reference to ONRLUP-NS-001</p>

		<p>Land Use Planning and the Siting of Nuclear Installations and also to include the OCZ for AWE Aldermaston as 5km. Noted and appropriate changes made. AWE (lpr2292) comment the Policy needs express support for development at AWE A and AWE B. As they're not DEAs, a policy for alternative bespoke designation should be created in recognition of the sites' importance to the local economy and to national security for consistency with the Local Plan CS Policy CS9(b) and the NPPF. Also recommend that, based on the Radiation (Emergency Preparedness and Public Information) Regulations 2019, Outline Planning Zone (OPZ) should be used instead of OCZ. Due to the unique nature of the employment at AWE, the Council is not able to assign it as a DEA. However, the Council is aware of the unique status of this significant employer and is proposing a separate policy to support the development of AWE A and AWE B, reference DM33. The term OCZ is one provided by ONR in relation to development management purposes and OPZ in REPPIR for emergency planning purposes. Environment Agency (lpr1658) request the addition of Environmental Permitting Regulations 2016 (EPR). Both sites generate radioactive wastes and the minimisation and disposal of these wastes is regulated under EPR permits, regulated by the Environment Agency. Comments noted and changes made.</p> <p>Despite comments from Green Park Reading (lpr2032), the statement non-residential development would be unlikely to have a significant impact on the offsite emergency plan cannot be substantiated and therefore changes cannot be made. Especially since under certain circumstances some employment can be changed to residential under permitted development rights.</p>
<b>Our environment &amp; surroundings</b>		
<p>SP5 Responding to Climate Change</p>	<p>43</p>	<p>Mixed support. Many comments do not agree with requirement for all development to achieve the highest viable levels of energy efficiency, recommending policy simply require conformity with the Building Regulations that are in force at the time of development.</p> <p>WBC declared a Climate Change Emergency in 2019 and District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform next stages of Local Plan. Proposed Submission LPR Policy SP5 and DM4 will be the key policy tools to achieve carbon reduction in new homes built within the District. Main policies for tackling climate change have been developed by consultants and potential costs have been tested for their impact on viability. Policy SP5 sets out overall strategic approach to the topic while DM4 sets out very clear targets and standards to be met in development.</p> <p>Several comments wish to see policy strengthened. Comment new local plans should reflect the need to go beyond carbon neutrality in new developments and should positively encourage developments whose main purpose is to combat</p>



		<p>climate change, e.g., renewable energy projects. Suggest these should be part of essential infrastructure of the District to build better sustainable communities and be partially funded by CIL contributions. The Council considers the policy, and other relevant LPR policies, clear in their intent to tackle climate change through sustainable development. Placing the burden of net carbon positive on new development to compensate for past and present excesses in not considered equitable. The achievement of carbon neutrality will be a product of many plans as part of wider strategy to address the climate emergency. LPR should be read as a whole. Measures to increase the adoption of retrofitting energy efficiency measures for existing housing stock may be explored in subsequent Local Plan Documents and other government policy programs. The Sustainability Statement and any subsequent conditions applied at the planning application stage and subsequently enforced along with Building Regulations, will ensure the policy is complied with. Government guidance and policy has been constantly updated in recent years. The Government is in the process of consulting on a Future Homes Standard hoping to be passed into legislation in 2024. An interim change to the Building Regulations occurred in June 2022. Council disagrees with suggestions there is an inherent incompatibility between development and the conservation and enhancement of biodiversity. The policies in the Local Plan that complement the Climate Change policy are intended to ensure development is sustainable and deliver biodiversity net gain. Proposed sites selected for allocation in sustainable locations have been subject to a robust process of assessment including a Sustainability Assessment taking account of the NPPF.</p>
SP6 Flood Risk	28	<p>The policy has been strengthened to include reference to Natural Flood Management (NFM). The Environment Agency also identified that some of the sites which are proposed for allocation would need to be subject to a Level 2 Strategic Flood Risk Assessment. This has now taken place.</p>
SP7 Design Principles	32	<p>The policy has been amended to clarify that the National Design Guide provides the framework for the policy. Further detail is then provided in the supporting text.</p>
SP8 Landscape Character	24	<p>Comments that the policy needed to be revised to distinguish between the hierarchy of international, national and locally designated sites (as per paragraph 171 of the NPPF) and identify those landscapes that are valued (as per paragraph 170). There is no definition of 'valued landscape' in the NPPF and the Council has adopted an evidence based approach. Policy slightly amended for clarity.</p>
SP9 Historic Environment	24	<p>Amendments have been made to the policy to more accurately reflect the wider proactive strategy the Council is adopting towards the conservation and enjoyment of the historic environment. The supporting text has been clarified to set out the programme of CAAs the Council intends to undertake. The policy has been amended to more accurately reflect the</p>

		'balanced judgement' approach to non-designated heritage assets as set out in the NPPF. Policy has also been amended to include enabling development which was originally contained as part of DC1.
SP10 Green Infrastructure	34	The definition of GI has been clarified. The policy has been updated to refer to the Green Infrastructure Framework currently being produced by Natural England. The policy has been strengthened with regard to long term maintenance requirements for major applications. Policy also strengthened in relation to PROW.
SP11 Biodiversity and geodiversity	34	A number of amendments have been made to the LPR in order to strengthen the policy protection to the water environment within the District. With regards to the hierarchy of sites, the policy and supporting text have been updated to better reflect paragraph 175 of the NPPF. With regards to the mitigation hierarchy the policy has amended to better reflect paragraph 179 of the NPPF. Reflecting its passage into the Environment Act 2021, Biodiversity Net Gain, has been moved to the start of the policy. The supporting text gives further information and clarifies that net gain has to be measurable against the recognised biodiversity accounting metric. Clarification is now provided on the type of assessment that should support a planning application. The supporting text has been amended to provide more detail on SACs in and outside the District and also amended in respect of nutrient neutrality to make clear the Council's approach is set out in Policy DM6 and that a more detailed Supplementary Planning Document will be produced.
<b>Delivering housing</b>		
SP12 Approach to Housing Delivery	83	<p>A number of planning agents, on behalf of landowners or developers have argued for a higher housing requirement, raising the issues of meeting Reading's need, increasing delivery of affordable homes and supporting economic growth. Some agents questioned the use of a range for the housing requirement and felt the upper end should be a minimum figure.</p> <p>On the supply side the main issues raised were the over-reliance on large strategic sites which can be slow to deliver and the size of the windfall allowance, with agents generally arguing that it was too high and individuals and local and parish councils feeling it was not high enough.</p> <p>It is not considered that a change in approach is required. The NPPF expects authorities to follow the standard method to assess need, and it is considered that a housing requirement that is slightly higher than the LHN, demonstrating that the assessed need can be met, is appropriate. The use of a range to express the requirement introduces some flexibility.</p> <p>With regard to housing land supply, the Council approach is for a mix of sites, the strategic sites which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites (including brownfield sites within settlement boundaries) that</p>

		<p>can deliver housing sooner. The windfall allowance is considered appropriate; it is a modest one based on past delivery on small sites. This also introduces some flexibility. Though the Council needs to be able to demonstrate that the housing requirement can be met in a plan-led fashion rather than relying on brownfield land to come forward at the appropriate time, larger sites within settlement boundaries that do come forward will further boost supply.</p> <p>The policy has been updated to take account of the 2022 Local Housing Need and the updated housing supply position.</p>
SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham	56	Some of the sites proposed for allocation in the emerging draft LPR have been removed due to changing circumstance such as revised national guidance on ancient woodland, concerns around deliverability, and the decision not to allocate sites within settlement boundaries.
SP14 Sites allocated for residential development in Eastern Area	41	<p>The supporting text has been updated to recognise that if the DEPZ around AWE is reviewed and the emergency planning arrangements reviewed, then future reviews of the Local Plan will consider if a strategic allocation in the Grazeley area would be suitable.</p> <p>Some of the sites proposed for allocation in the emerging draft LPR have been removed, due to development of sites being rolled forward from the current Local Plan being at an advanced stage of construction, and also because of the AWE Burghfield DEPZ. The development potential for two of the allocations has also been reduced following the completion of landscape sensitivity and capacity assessment.</p>
SP15 Sites allocated for residential development in North Wessex Downs AONB	32	Some of the sites proposed for allocation in the emerging draft LPR have been removed due to development of sites being rolled forward from the current Local Plan being at an advanced stage of construction.
SP16 Sandford strategic site allocation	40	Concern about the number of dwellings and the impact on the countryside, local roads and services in general. Warren Rd of particular concern. Lack of infrastructure provision to cope with housing. The landscape is highly valued and the site and woodlands are considered to have high ecological value and should not be developed
SP17 North East Thatcham Strategic Site Allocation	446	In response to the large number of objections to this site covering a range of issues important to local people, but largely around the environmental impact of the proposal and the impact on local infrastructure, the Council has taken the decision to reduce the number of dwellings on the site and to allocate it for 1500 dwellings for delivery over the plan period. This still enables a strategic level of development which can provide onsite community facilities. It is noted, that compared to a higher number of dwellings, this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within

		Thatcham.
SP18 Housing type and mix	13	<p>Comments received that NDPs should be able to set a different housing mix requirement locally. Flexibility has been introduced into the Policy where developments will be expected to reflect this mix, however, rigid application of these requirements may not be appropriate in all cases.</p> <p>The Policy has been amended to require all new dwellings to meet the higher accessibility standards under Part M4 (2) of the Building Regulations.</p>
SP19 Affordable Housing	30	<p>Reference to affordable housing remaining at an affordable price for future generations of eligible households has been included in the final paragraph of the Policy and explained in more detail in the supporting text. The tenure split in the proposed policy has been amended to reflect the requirement to deliver First Homes. Policy has been amended to acknowledge the different circumstances relating to affordable housing provision on proposed C2 residential care developments and their specific operational characteristics. Additional text added at end of supporting text of Policy SP19 to also show specific support for affordable community led housing schemes.</p>
<b>Fostering economic growth &amp; supporting local communities</b>		
SP20 Strategic approach to economic development and hierarchy of centres	35	<p>Policy redrafted to take into account updated evidence (taking account of Covid and Brexit) and to reflect NPPF requirements. In addition, the text relating to town centres has been removed and a new standalone policy created to address town and district centres - Proposed Submission LPR Policy SP22.</p>
SP21 Sites allocated for economic development	92	<p>Policy amended to reflect new site allocations and DEAs. Some Reg. 18 sites had to be removed due to their location within the DEPZ and landscape impact. New allocations are set out within SP21 to assist in meeting the updated identified need for industrial land (ELR, 2022). As a result of identifying site allocations, and to guide future development on the allocated site, each site has a new site specific policy Policy ESA 1-6.</p>
SP22 Transport	27	<p>Comments generally supportive with suggestions to improve. Comments requesting definition of active travel and sustainable travel. Active travel relates to travel requiring physical effort, walking, cycling or wheeling (e.g. use of scooters or wheelchairs) and horse riding. Sustainable travel relates to that which minimises negative social, environmental and climate impacts of travel.</p> <p>Policy amended to minimise impact of all travel on environment in accordance with Climate Emergency and Environment Strategy.</p> <p>The Council published its Local Cycling &amp; Walking Investment Plan (June 2021) to guide future active travel related investment. The LTP Active Travel strategy will be reviewed when refreshing Local Transport Plan (LTP). New micro-mobility technologies, e.g., electric bicycles, to be encouraged</p>

	<p>as they emerge. The Council actively seeks secure and covered cycle parking as part of workplace travel and have provided such with GWR. Several queries into whether the Active Travel Plan is separate from the LTP. Yes, Active Travel Strategy is a supporting document of the current LTP, the main role of the strategy is to outline in detail how Active Travel related policies of the LTP will be delivered. Supporting text amended to emphasis separation of the two documents and LTP and supporting strategies to be reviewed.</p> <p>The Council, with GWR, are improving passenger facilities and car parking at Theale station aiming to make it a Park &amp; Rail site, serving areas of west Reading.</p> <p>Comments on limited transport options available to rural parts of the district. The Council recently published a Bus Services Improvement Plan (Oct 2022) outlining its intentions to develop bus services in WB, including rural areas where there is no/ very minimal bus service.</p> <p>West Berkshire Green Exchange (lpr1557) requests consideration be given to parking and power infrastructure and electric vehicle charging points for household parking and development of rapid charging hubs in suitable locations. Should include the potential future fuel hydrogen in plans. EVCP and infrastructure provision is actively sought for in DM processes, especially DM42. The Council is currently developing guidance outlining the requirements developers will be expected to provide. The Government now requires new homes and buildings to install EVCP as part of English Building Regulations. Alternative fuels, .e.g, Hydrogen, may develop during the course of the plan and will be covered in imminent review of the Council's LTP.</p> <p>Proposed growth outlined in draft Local Plan seeks to manage demand for travel by making best use of existing highway networks, capacity enhancements largely confined within existing network, combined with measures to develop and encourage sustainable and active travel choices. Comments requiring a full traffic modelling analysis to inform development, many specifically relating to NET, considering the impact of extra demand in addition to underlying growth rates. Highways England (lpr1333) expect to see an assessment of potential impacts from sites (close to the A34/M4 at Newbury and Thatcham and the M4 in the Eastern Area) on the strategic road network (SRN). Smaller sites individually may not have a significant impact on the SRN but collectively there may be significant impact without mitigation measures. These must avoid adverse and harmful impacts on health and well-being, including air quality degradation or noise pollution, which would conflict with DM5. Comments that to predict traffic profile for 2037 is too uncertain so must consider a range of scenarios. The Highway Design Guidance, should form part of the evidence base. It is currently in draft form and will be shared as part of the evidence base as soon as possible. Engagement has commenced with National Highways. The impact of the Local Plan proposals on the Strategic Highway Network, particularly in relation to the M4</p>
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		12 & 13 junctions and the A34 in the Newbury area, will be fully assessed and provided to National Highways. The detailed transport modelling undertaken as part of the Transport Assessment, including WB Strategic Transport Model and the local Thatcham VISSIM model, will outline impact of proposed Local Plan growth on the local highway network concerning potential travel patterns, destinations and modes of travel. Proposed growth (including increased capacity from the NET site and Smart Motorway) and overall background traffic growth is considered in future years transport modelling scenarios comprising of both the main strategic sites and the cumulative growth of proposed smaller sites. Masterplanning work for the main strategic sites will include identifying appropriate highway and non-highway sustainable / active travel mitigation packages that will be required to accommodate planned growth, in accordance with Department for Transport WebTag guidance.
SP23 Infrastructure requirements and delivery	12	Appendix 5 of the Emerging Draft LPR has been deleted. The Draft IDP was published on Council's website on October 2021 which includes a schedule of infrastructure requirements, including those for health and education, blue infrastructure and drainage schemes. The Draft IDP will be published alongside the Regulation 19 Local Plan Review.
<b>Sites allocated for residential development</b>		
Sites allocated in Newbury & Thacham	3	Detailed issues only which are picked up in Appendix H
Sites allocated in the Eastern Area	1	Detailed issues only which are picked up in Appendix H
RSA1 The Kennet Centre, Newbury	14	The allocation has been removed due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1.
RSA2 Land north of Newbury College, Monks Lane, Newbury	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.
RSA3 Land at Bath Road, Speen, Newbury	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC, a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA4 Land at Coley Farm, Stoney Lane, Newbury	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A Construction and Operations Management Plan (COMP)

		required to safeguard the oil pipeline running through the site. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA5: Land adjoining New Road, Newbury	7	The allocation has been removed due to the adverse impact on the surrounding Ancient Woodland.
RSA6 Land off Greenham Road and New Road, South East Newbury	5	The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. It is acknowledged that two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy has been amended accordingly.
RSA7 Land at Lower Way, Thatcham	7	Policy strengthened to address concerns about potential adverse impacts on the Kennet and Lambourn Floodplain SAC and Thatcham Reedbeds SSSI. The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA8 Land at Poplar Farm, Cold Ash	4	The allocation has been removed because it is not considered deliverable at this time.
RSA9 St Gabriel's Farm, The Ridge, Cold Ash	3	The allocation has been removed because development on the site is under construction.
RSA10 Stoneham's Farm, Long Lane, Tilehurst - Site A	4	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP. Addition of buffer of at least 15m to the ancient woodland. Allocation boundary revised to exclude part of the landscape buffer to the north for clarity.
RSA11 Stoneham's Farm, Tilehurst - Site B	4	The allocation has been removed because development on the site is under construction.
RSA12 72 Purley Rise, Purley on Thames	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A large part of the site is not considered appropriate for development this is reflected in the amount of the site allocated as required landscape buffer. In the interests of clarity, the Council has adjusted the boundary of the allocated site to remove the landscape buffer.
RSA13 Land adjacent to Junction 12 of M4, Bath Road, Calcot	4	The allocation has been removed because development on the site is under construction.
RSA14 Land adjacent to Bath	3	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.

Road and Dorking Way, Calcot		Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA15 Land between A340 and The Green, Theale	5	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A Construction and Operations Management Plan (COMP) required to safeguard the oil pipeline running through the site. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP. Ecological Impact Assessment now required. Policy also makes clear that the required landscape buffer in the western part of the site will be retained outside of the settlement boundary for Theale.
RSA16 Whitehart Meadow, Theale	25	Following landscape evidence, which was obtained in part due to comments from the AONB and Natural England, the housing number has been amended from 100 to 40. The policy includes a list of criteria, and includes specific criterion to limit the impact on the landscape. Criteria added in relation to buffer to watercourse and need for FRA; a detailed water supply strategy; an ecological assessment; and provision of walking and cycling routes. Since the consultation on the emerging draft LPR, other detailed criteria have also been included in the policy to guide the development.
RSA17 Former Theale Sewage Treatment Works, Theale	23	Following landscape evidence, which was obtained in part due to comments from the AONB and Natural England, the housing number has been amended from 70 to 60. The policy includes a list of criteria, and includes specific criterion to limit the impact on the landscape. Criteria added in relation to buffer to watercourse and need for FRA; a detailed water supply strategy; and an ecological assessment. Since the consultation on the emerging draft LPR, other detailed criteria have been included in the policy to guide the development.
RSA18 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common	8	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Further clarification given to the buffer zone to the watercourse and also buffer to Ancient Woodland, Policy strengthened to clarify the requirements in relation to footpath and cycle links.
RSA19 Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44 Lamden Way, Burghfield Common	7	The allocation has been removed due to objections from Emergency Planning on grounds of public safety.
RSA20 Land north of A4 Bath Road, Woolhampton	6	The policy has been amended to require an archaeological desk based assessment. The policy now requires that an integrated water supply and drainage strategy is provided in advance of development.
RSA21 Land east of Salisbury Road, Hungerford	4	The allocation has been removed because development on the site is under construction.



RSA22 Land adjoining Lynch Lane, Lambourn	10	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged
RSA23 Land at Newbury Road, Lambourn	7	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. The policy also includes a criterion to reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC.
RSA24 Land off Stretton Close, Bradfield Southend	2	The allocation has been removed because development on the site is under construction.
RSA25 Land North of Southend Road, Bradfield Southend	11	The housing number has been amended to 20 based on reassessing the development potential, landscape impact and relationship with the adjacent housing site. Since the consultation on the emerging draft LPR, detailed criteria have been included in the policy to guide the development.
RSA26 Land at Chieveley Glebe, Chieveley	20	The policy now requires the development design and layout to be further informed by a Heritage Impact Assessment. Since the consultation on the emerging draft LPR, detailed criteria have been included in the policy to guide the development.
RSA27 Pirbright Institute Site, Compton	7	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Policy amended to make clear the former east/west public footpath through the site should be reinstated and the adjacent line of trees and remnants of the hedgerow should be retained. If feasible, access for residents to Compton Primary School and/or The Ilsleys Primary School should also be provided.
RSA28 Land west of Spring Meadows, Great Shefford	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Since the consultation on the emerging draft LPR, detailed criteria have been included in the policy to guide the development.
RSA29 Land off Charlotte Close, Hermitage	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Green infrastructure requirements clarified to adopt a more strategic approach to the provision of GI in conjunction with the two other allocations in this part of Hermitage. Development design now seeks opportunities to open up the culvert and contribute to biodiversity net gain. Strengthened requirements in relation to foot and cyclepath linkages. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC a Habitats Regulations

		Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA30 Land to the south east of the Old Farmhouse, Hermitage	9	The policy now requires that an integrated water supply and drainage strategy is provided in advance of development. Green infrastructure requirements clarified to adopt a more strategic approach to the provision of GI in conjunction with the two other allocations in this part of Hermitage. Development design now seeks opportunities to open up the culvert and contribute to biodiversity net gain. Strengthened requirements in relation to foot and cyclepath linkages. Amended to introduce some flexibility with regards to access. To reflect the fact that the site lies within the Nutrient Neutrality Zone for the River Lambourn SAC a Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged. Mineral Safeguarding Area so criterion added requiring consideration of Policy 9 of the MWLP.
RSA31 Land adjoining The Haven, Kintbury	20	Detailed issues only which are picked up in Appendix I
RSA32 New Stocks Farm, Paices Hill, Aldermaston	5	Detailed issues only which are picked up in Appendix I
RSA33 Long Copse Farm, Enborne	5	A large part of the site is not considered appropriate for development which is reflected in the amount of the site allocated as required landscape buffer. In the interests of clarity, the Council has adjusted boundary of the allocated site to remove the landscape buffer. Policy also amended to require an ecological impact assessment, to clarify the criterion on the buffer to the Ancient Woodland to be informed by an assessment, and to be considerate of the M+WLP.
<b>Development Management Policies</b>		
All DC policies amended to DM policies for the Proposed Submission LPR		
DC1 Development in the countryside	21	Policy has been amended to cover residential development in the countryside only. This is in the interests of clarity. Proposed Submission LPR Policy DM35 will set out the Council's approach to sustaining a prosperous rural economy. Policy SP1 has been amended to highlight the principle that proposals to strengthen and diversify the rural economy will be encouraged.  Policy should be read in conjunction with SP1 which sets out overall spatial strategy of the District. SP1 amended so proposals to strengthen and diversify the rural economy

		<p>encouraged, particularly where they are located in or adjacent to Rural Service Centres and Service Villages identified in the settlement hierarchy. Existing small and medium sized enterprises within the countryside will be supported in order to provide local job opportunities and maintain the vitality of smaller rural settlements and their communities.</p> <p>In the context of SP1, DC16 and supporting text make clear that rural exception schemes can allow for a proportion of market housing where this enables the closing of a funding gap (which must be evidenced) and where the market homes are integrated with the affordable homes to form a single scheme.</p> <p>Policies SP5, 7, 8 and DC3 make clear that all development, regardless of its location, should contribute to West Berkshire becoming and staying carbon neutral by 2030. Even if a development is carbon neutral or better it should still confirm with other relevant policies in the Plan.</p> <p>Proposed DM35 will set out the Council's approach to sustaining a prosperous rural economy, focusing on previously developed land (PDL) and the supporting text amended to reflect this.</p> <p>Criterion I has worked well to date and the Council considers it provides both flexibility and an appropriate balance. Development in the countryside is strictly limited, particularly for residential development and the policy is clear that proposals must not harm or undermine the existing relationship of a settlement within the open countryside.</p>
DC2 Health and wellbeing	13	<p>Comments received generally supportive of the policy with specific suggestions as to how it could be improved. Most of these are more appropriately dealt with by other policies. As far as defining and quantifying what is an unacceptable impact on health, the policy makes clear that a Health Impact Assessment will need be prepared in accordance with guidance from Public Health England. The supporting text makes clear that Health Impact Assessments will consider the likelihood, significance and duration of both the potential positive and negative impacts of proposals and will identify what will be monitored, how and by whom. They will also take into account the cumulative impacts of development.</p>
DC3 Building Sustainable Homes and Businesses	30	<p>Broadly supportive of approach and principles. Concerns that the policy is not ambitious enough considering climate crisis and, following the publication of the 2019/20 "Future Homes Standard" consultation, should review the requirement to deliver the HQM, to rely on the latest nationally adopted standards/ requirements/ innovations instead, for future proofing. Comments that renewable energy should be a separate DM policy. Reservations on enforcement of Policy. The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards. The Proposed Submission LPR policy will be generally supportive of renewable energy schemes subject to and according to their proposed location and goes a long way to meet up-to-date requirements. The Council is aware of the</p>

		challenges in putting the new policies into practice and is looking at ways to ensure they are delivered satisfactorily.
DC4 Environmental nuisance and pollution control	10	Comments generally supportive. Many comments objected to the lack of policy on reducing lighting pollution to preserve the AONB's dark skies and protect biodiversity. The Policy was expanded to require that every planning stage reasonably avoids the negative impacts of light pollution on wildlife and residents, with Lighting Appraisals carried out for proposed developments that include outdoor lighting using guidance from the Institute of Lighting Professionals (ILP) (or similar body), national guidance and British Standards. Policy was revised to ensure adverse impacts on health and quality of life arising from noise from new development is mitigated and minimised. The Woodland Trust (lpr1012) raised concerns that Ancient Woodland is greatly at risk from ammonia pollution so the supporting text of Policy DM15 was amended to include specific requirements that additional screening is needed to demonstrate that there will be no deterioration or impacts on Ancient Woodland as a result of the contributions from ammonia-emitting developments.
DC5 Water quality	9	Policy amended to require proposals which are not connecting to the sewer network and which are within 500 metres of a SSSI to carry out an assessment. Policy amended to require proposals for built development to be at least ten metres away from the top of the bank of the nearest watercourse or main river providing or retaining a natural or semi-natural habitat buffer. Supporting text has been included to provide further information and justification. Policy amended so that special regard is given to the River Kennet and River Lambourn to support the improvement of their status and overall health. Supporting text has been amended in relation to Sustainable Drainage Systems to ensure that the policy is consistent with paragraphs 174 and 183 of the NPPF. Policy has been amended to clarify that proposals within the hydrological catchment of the River Lambourn SAC or River Test will be required to demonstrate nutrient neutrality.
DC6 Water resources	11	The title of the policy has been amended to include 'wastewater' to provide greater clarity. The supporting text has been strengthened to provide the justification for the higher water efficiency standard. Policy amended to highlight that where upgrades to water supply and waste water networks are required, consideration should be given to the phasing of development. Such as change will ensure that the policy has greater regard to paragraph 174 (criteria 3) of the NPPF.
DC7 Air Quality	7	The supporting text has been amended regarding the impact that green infrastructure can have in relation to air quality. The policy has been updated to provide greater clarity and reflect Planning Practice Guidance. Strong support received in the comments, particularly in relation to opposing development where air pollution affects schools. Thatcham Town Council (lpr1415) comment that the Policy must reflect odour nuisance and its assessment based

		on recurring odour issues from the Sewage Works in Thatcham Lower Way. The LPR should be regarded as a whole for approach to odour, including DM5 Environmental Nuisance and Pollution Control and DM30 Residential Amenity policies. Further objections on monitoring methodology of Air Quality Assessments in the Thatcham Air Quality Management Area (AQMA) redirected to the West Berkshire Local Air Quality Management Annual Status Report 2021, to demonstrate Thatcham AQMA is being regularly monitored and contains measures to improve air quality within the area (including the A4).
DC8 Conservation Areas	11	Generally supportive comments. Concerns from Historic England (lpr1584) and West Berkshire Heritage Forum (lpr91) that Policy does not discuss Conservation Area Appraisals (CAA) therefore flaws in evidence base of LPR and the active programme of conservation. Suggestions that voluntary contributions not enough for CAA and the funding should be committed. Policy amended and Council recognises importance as part of strategy to maximise opportunities for conservation and enjoyment of historic environment. The Council is undertaking a phased programme of CAAs, in partnership with the West Berkshire Heritage Forum, with a priority list of Conservation Areas (CAs). As a result of funding ,CAA for Newbury town centre is due to be complete by 2023 and CAAs for Thatcham and Hungerford will follow. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. Proposals for developments will be determined in accordance with Policy SP9. Certain criterion removed as agreed not necessary.
DC9 Listed Buildings	10	Majority of comments received supportive. Policy SP9 states that development which would lead to substantial harm, or loss to the significance of a listed building or its setting will not be permitted nor will a development that would lead to less than substantial harm to the significance of a listed building or its setting. As set out in supporting text, The Council agrees an up-to-date, 'whole-building' approach is needed for energy efficiency measures to be suitable, robust, well integrated, properly coordinated and sustainable. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers and Historic England agrees.
DC10 Non-designated Heritage Assets	13	Comments generally supportive. Policy amended to include commons features both relating to its use by commoners and relict monuments that have survived due to lack of development. Canal & River Trust (lpr888) state the canal should be considered as a non-designated heritage asset, agreed and Policy amended to include built elements of the Kennet & Avon Canal not already on the National Heritage List for England. Policy amended to include structures and earthworks found along historic routeways and supporting text to expand to include landscape features that add local character and distinctiveness to the landscape. Proposals for

		developments will be determined in accordance with Policy SP9, amended to make clear that where development is proposed a balanced judgment will be made regarding scale of harm or loss and the significance of heritage asset. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers.
DC11 Registered Parks and Gardens	12	Majority of comments received supportive. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers and Historic England agrees.
DC12 Registered Battlefields	8	Majority of comments received supportive. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers and Historic England agrees.
DC13 Assets of Archaeological Importance	7	Majority of comments received supportive. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers and Historic England agrees.
DC14 Trees, woodland and hedgerows	26	The policy has been tightened and more detail provided for ancient woodlands.
DC15 Entry level exception schemes	10	New national policy has been published (Written Ministerial Statement on First Homes) which replaces paragraph 72 of the National Planning Policy Framework. Entry-level exception sites have therefore been replaced with First Homes exception sites.
DC16 Rural Exception Housing	11	Majority of comments supportive. Englefield Estate Office (lpr1538) suggests alternative methods to local housing needs surveys, noted but they are a well-established tool which provide a clear way to assess local housing needs. It is agreed that the need to consider local character and the AONB is covered elsewhere in the plan and as the plan should be read as a whole. Repetitive text deleted.
DC17 Self and custom build	12	The Council has proposed residential allocations in the LPR that will include an element of self-build (North East Thatcham and Purley Rise). It is not considered necessary to have site allocations specifically for self- and custom-build housing.
DC18 Specialised housing	10	Policy amended to clarify that the need implies locally identified need in the whole District. Amendments to Policy and supporting text to confirm delivery of specialist care housing as part of the mix on the strategic housing allocations in the Local Plan and from other large housing sites where feasible.
DC19 Gypsies, Travellers and Travelling Showpeople	12	Policy updated to respond to GTAA refresh 2021. Criteria added to safeguard existing authorised sites, and outline where sites could be directed to, and list of criteria updated to be consistent with other policies in terms of requirements. Reference made to the preparation of a specific DPD in the policy.

DC20 Retention of mobile home parks	6	Comments received support Policy. There is a need to ensure that these sites which currently provide low-cost accommodation continue to provide affordable accommodation.
DC21 Residential use of space above shops and offices	8	<p>Policy updated to state developments are above non-residential units, deleting 'shops'.</p> <p>Comments supportive of policy. Issues of cycle parking and bin storage commented upon are covered in accordance with Policies DM42 and DM44 (and the supporting text of policy DM31) and Policy SP7. Policy amended to reflect the National policy and legislation requirements that planning applications for the conversion of non-residential space to residential use must comply with so standards are clear.</p>
DC22 Housing Related to Rural Workers	9	<p>Educational and institutional establishments have been removed from the policy, and a new policy written for such establishments in the countryside. The term 'business' has been inserted to replace 'enterprise' to be consistent with the NPPF and other LPR policies.</p> <p>Generally supportive comments. Lucy White Planning for Bradfield College (lpr1156) objects to the ambiguous nature of the Policy regarding the provision of staff accommodation as the Policy applies to schools and colleges in rural areas but does not clarify whether all other policy criteria would be applied in which case Bradfield College objects further. The policy attempts to place elements of Local Plan policy ENV27 (Development on existing institutional and educational sites in the countryside) into the policy on housing for rural workers, as it is recognised that schools in the countryside have a housing stock for staff and schemes for new staff accommodation. It is agreed that some ambiguities have resulted in the merging of such policies. DM38 (development on existing educational and institutional sites in the countryside) has been included in the Submission Version, and would replace Local Plan policy ENV27. Therefore, educational and institutional establishments have been removed from this Policy.</p> <p>Councillor Tony Vickers (lpr619) require amendment ensuring that new housing in this category remains occupied by a working family in perpetuity if employee retires or dies by re-housing the employee's family. It is difficult for planning policy and decision makers to require re-homing of an employee's dependent family. However, supporting text amended that applicants should detail planning permission whether it is possible thus allowing existing residence to be used for incoming rural worker. Upon comments, the importance of the horse racing industry is recognised, supporting text amended to include 'similar land based rural enterprise' but Policy should be read in conjunction with Proposed Submission Policy DM37.</p>
DC23 Conversion and/or re-use of Existing Redundant and Disused	12	The Policy has been clarified to refer to 'conversion of existing redundant and disused buildings' only. Added vehicular access to be suitable in landscape terms. Supporting text amended to strengthen approach to such development.

Buildings in the Countryside to Residential Use		<p>Mixed support for the policy. Concerns that the Policy should be more flexible to re-use buildings not structurally sound in their entirety, requests to preserve/ restore and reuse structures in the countryside that reflect the local character and to remove eyesores. Comments that structures being proved genuinely redundant or disused is ambiguous. The purpose of criterion a) (was i) in the Emerging Draft LPR) is to ensure the policy is applicable to buildings capable of conversion, rather than needing significant building works to enable the habitation of the building, in line with the NPPF. The supporting text provides detail on the policy's purpose and is explicit in its intention not to apply to buildings that have an adverse visual/landscape impact e.g., large agricultural sheds. It makes clear that not all buildings will be suitable for conversion and or reuse, due to their location, condition or appearance. A case officer must be satisfied that the building is genuinely redundant or disused and the Council will take account of all circumstances to judge this. It further outlines that the policy does not allow for the development of derelict buildings, and such residential development would be considered under Policy DM1. Some comments requesting clarity on the meaning of 'substantial rebuilding'. In this context its ordinary meaning of 'extensive'. The extent to which proposals are considered 'substantial' will vary depending on the scale and type of building affected and the relative extent of the works required. Supporting text strengthened to reflect this. Made clear that Policy should be read in conjunction with other policies and LPR is in line with NPPF.</p>
DC24 Replacement of Existing Dwellings in the Countryside	8	<p>Supporting text strengthened to consider design and impact on landscape. Supporting text strengthened to consider climate resilience.</p> <p>Comments generally supportive. Comments suggesting the policy should provide more positive encouragement to the enhancement of sustainability (ie energy needs and provision, carbon neutrality) and design creativity where the landscape allows. Policy and supporting text amended refer to SP7 and SP5 with sustainable technologies, positive action and resilience to climate change. North Wessex Downs AONB (lpr1615) comment the Policy is not restrictive enough on replacement dwelling size as the AONB is sensitive to changes in building mass/bulk. The Council has, through Housing Site Allocations DPD, moved towards examining the overall design, including scale, mass and bulk. This is considered to allow applicants and their designers, and the decision maker, greater flexibility in considering the impact of a replacement dwelling on the landscape than purely looking at a numerical size increase. Supporting text of proposed submission amended to align with changes to DM28, referencing key components of proportionality and stating that disproportionate replacement dwellings will not be allowed. The NPPF make clear, in regards to replacement dwellings in the countryside, the need for good design of development and the importance of responding to local character and distinctiveness, reflecting the identity of local surroundings.</p>



		The replacement of existing dwellings in the countryside is an important local issue in West Berkshire and the policy will continue to provide a framework for decision making on this matter. The Policy is therefore consistent with the NPPF and all criterion are necessary.
DC25 Extension of residential curtilages in the countryside	8	<p>Insertion of specific landscape features to be maintained, to aid in conserving and enhancing local character.</p> <p>Comments generally supportive. Policy amended to refer to public rights of way, instead of public footpaths, and supporting text amended to specify the countryside in opening paragraph to reflect Policy name. Although no specific guidance is given, the NPPF refers to the need to recognise the intrinsic character and beauty of the countryside and protect and enhance valued landscapes such as the AONB (para 170). The acceptability of such proposals will therefore depend upon the impact on the surroundings and the impact of each proposal will be considered individually as each will be expected to have no harm on the setting or wider landscape. The policy criteria seek to ensure that any adverse impact on character and local distinctiveness are avoided. Comments referring to the overall carbon footprint of a property should be considered in conjunction with other relevant policies such as SP5 and SP7.</p>
DC26 Sub-division of Existing Dwellings in the Countryside	8	<p>All comments supportive except Fowler Architecture and Planning (lpr1807). The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. Comments that wording should be changed to 'existing building' but the NPPF published in July 2021 has not incorporated this change and refers to 'residential building'.</p> <p>Comments that require consideration of accessibility principles is inconsistent with NPPF. The NPPF does allow subdivision in the countryside, but this does not prevent other factors coming in to the assessment of a scheme (and also does not override the statutory status of the development plan as a starting point for decision making). The NPPF also seeks 'accessible services' and for land to be available in the right places (para 8) whilst the whole of section 9 in the NPPF is about promoting sustainable transport. It is therefore still considered consistent with the NPPF to consider accessibility in a development plan policy for West Berkshire. Minor criterion amended.</p>
DC27 Residential extensions	8	<p>Comments supportive. Some comments more appropriately covered by other policies. The policy gives applicants, agents, interested parties and decision makers clear criteria under which a household extension would be assessed against, thus creating a level of certainty in what is expected from extensions. It is important to consider the original dwelling, particularly for dwellings outside of any defined settlement boundary. An extension has the potential to dominate the character and appearance of a dwelling and of its locality, and when in the countryside, lead to an overdevelopment and being disproportionate especially as extensions upon extensions can have the same affect. It is not considered that</p>

		<p>the policy precludes well designed extensions. The assessment depends very much on the particular circumstances of the dwelling, whether it has been extended previously, its plot, and its surroundings, as well as whether it lies within any designated areas (AONB or Conservation Area). These factors and the proposal would fall into the balance of considerations when determining a planning application. It is agreed that the policy cannot be used to assess permitted development schemes which are subject to prior approvals in their entirety. Only neighbour amenity can be considered (should a neighbour object) and supporting text amended to reflect this. No major changes.</p>
DC28 Residential annexes	7	<p>All comments supportive except Fowler Architecture and Planning (lpr1807). The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. Para 11.85 of the supporting text of the Proposed Submission LPR makes it clear that some types of annex benefit from permitted development rights. Minor criterion amended.</p>
DC29 Residential space standards	11	<p>Mixed support for the Policy from comments. Concerns there is no evidence or justification for requiring internal space policies, suggestions Policy is deleted for greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households based on affordability. The supporting evidence will be updated to strength the proposed policy and demonstrate that the policy is both needed and viable. Measurement of dwellings permitted in WB since the adoption of the Core Strategy show a significant proportion do not meet the nationally described space standard (NDSS). This is the case across the District but is particularly notable for the conversion of residential annexes and for town centre development. The WB whole plan viability assessment has concluded that development across the District can comply with the NDSS (alongside other policies set out in the Local Plan) and remain viable. Sovereign Housing Association Ltd. (lpr2170) broadly support Policy but note eight additional components to be achieved are already set out in the NDSS which could cause confusion should the NDSS be revised during the Plan Period. Policy amended to avoid repeating the national policy, instead new dwellings and conversion should comply with the NDSS as set out in the Technical Housing Standard (2015). Tetlow King Planning Ltd for Aster Group (lpr2356) comment that requiring future development to comply with 'any subsequent Government standard' is inappropriate as it is unknown and viability is untested which would be needed before the local plan could require applicants to comply with such a standard. It is agreed that future standards cannot be predicted and would need to be introduced in the local plan. Supporting text amended to reflect this. Further comments recommend that the Council reviews the local plan viability assessments with regard to these matters in accordance with the PPG tests which require that where a need for the standards is identified, local planning authorities should justify inclusion of a policy,</p>

		<p>taking account of need, viability and timing as blanket application of the NDSS may undermine viability of development schemes. National policy recognises the importance of high standards of housing design to improve health and wellbeing which this policy complies with by requiring new homes to have appropriate space for occupants, enabling a good quality of life and healthy lifestyle. The Council is starting with meeting the appropriate space standards.</p>
DC30 Residential amenity	8	<p>Comments generally supportive. Queries into parking availability for flats, case by case flexibility and standard amenity requirements. The Policy provides guidance for outdoor amenity space for flats. There is no distinction between town centre locations and out of centre locations, as the local environment (e.g. proximity to public green spaces) may affect the amount of open space provided as part of a development. Parking does not count in the amenity space calculation. Furthermore, balconies, where they do provide high quality space (e.g. Newbury Racecourse) may be counted as outdoor amenity space. Adequate provision of amenity space can vary between properties, particularly where there is already a garden space which is smaller than what the policy is trying to achieve. As the policy applies to flats as well as houses it is considered appropriate to keep the guide for sizes in the supporting text. The Policy is primarily aimed at ensuring that new developments do not have an adverse impact on neighbouring properties, and ensure that there is adequate private amenity (garden) space and a source of natural light seeking to provide a high standard of amenity for existing and future users of land and buildings, and includes particular criteria for the designer and decision maker to consider. The recommended garden distance is a long established method of seeking to achieve a distance of 21 metres between windows, to avoid overlooking. The policy is only a starting point, if there are justified grounds on which criteria cannot be complied with, evidence should be provided and the decision maker will then make a judgement on the acceptability of the scheme.</p>
DC31 Designated Employment Areas	16	<p>Policy amended to strengthen safeguarding and to more clearly reflect uses within DEAs. In addition, text relating to Theale rail-road transfer facility has been removed and a new standalone policy created for this site - Proposed Submission LPR Policy DM43.</p> <p>Mixed support for the Policy. Several sites are suggested for either inclusion, exclusion or adaption as DEAs. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation. The conclusions of the DEA review work and Landscape Sensitivity and Capacity Assessment will be published alongside the Regulation 19 consultation. Policy amended to update rebranded Lambourn Business Park and to recognise the current local Development Order for Greenham Business Park as commented by Savills</p>

		<p>on behalf of Lambourn Business Park (lpr2106) and Pro Vision on behalf of Greenham Trust Ltd (lpr2369) respectively. To inform the LPR, the Council uses landscape sensitivity and capacity assessments to understand impact of development on areas. A clear definition of 'small scale commercial' requested in relation to policy. This Policy relates to DEAs, their role and function as well as the uses permitted within these areas. They are locations across the District designated for business development, and for the purposes of the LPR business development relates to offices, industry, storage and distribution uses. Comments on proposals resulting in loss of employment floorspace not being permitted, query into office buildings to residential development conversions. Supporting text amended to highlight that where necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>
<p>DC32 Supporting the Rural Economy</p>	<p>16</p>	<p>Policy redrafted to better reflect the strategic aims of the approach to employment in rural areas and outside of Designated Employment Areas; in subsuming elements of deleted DC33 (PDL in the countryside), and removing reference to farm diversification which will be a new stand alone policy. Reference to 'enterprise' amended to 'business' to reflect NPPF and consistent with approach throughout the LPR. Addition of accessibility in the supporting text to reflect NPPF and in consideration of the rural nature of the District with opportunities to deliver environmental benefits.</p> <p>Mixed support for Policy from comments. No specific policy is required for development in the settlement boundary of market towns as it is broadly supported. The policy does not restrict the change of use away from residential. It would be for the decision maker to balance up the loss of housing with the benefit to the rural economy, and when considering SP12 which states that there should be no net losses from the existing housing stock, unless there is a reasoned justification. Concern from Savills on behalf of Englefield Estate (lpr542) that Policy not in line with NPPF and detailed criteria may prejudice suitable development being delivered in rural areas, specifically inflexible in requiring a long-term contribution to sustaining the whole enterprise. Similar comments from Fowler Architecture and Planning (lpr1801) who comment the policy should be deleted. It is recognised that the NPPF supports the rural economy, though specifically through the conversion of existing buildings and well-designed new buildings. Some restrictions are therefore placed on development types, and it's appropriate the Policy seeks to manage their impact whilst supporting the rural economy in line with the LPR's landscape-led approach. DM35 focuses on particular issues important to ensure development is sustainable and appropriate in terms of location and impact on the landscape and character of the site and area. The policy would replace Core Strategy policy CS10. Important that the applicant demonstrates enterprise sustainability and for the long term consequences on the rural economy to avoid</p>

		potentially unsuccessful buildings being left and converted inappropriately for the location (e.g. residential). A business plan or documentation to show that the business is viable would be of use in demonstrating such a contribution. The supporting text updated to reflect this. It is considered that the policy is positively supporting businesses in rural areas, and is flexible in its approach which is necessary as the transition away from EU- based rules for agriculture and forestry businesses continues.
DC33 Redevelopment of previously developed land in the countryside	9	The policy has been deleted. It has been amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy), which covers the redevelopment of land in the countryside for economic purposes. It was considered that a DM policy approach to the rural economy, in terms of new and redeveloped buildings would be better placed under one policy, and reduce any perceived confusion for users of the Plan.
DC34 Equestrian/racecourse industry	9	Further clarifications made in relation to the horseracing industry. Further detail provided in the supporting text with regards to the 'necessity' test. Title amended to Equestrian and Horseracing Industry.  Generally supportive comments. In response to comments that nationally the industry is referred to as the 'horse industry', the policy title is amended to Equestrian and Horseracing Industry. Comments that suitability and necessity tests should be clarified to ensure development brings benefit not harm. Necessity test supporting text updated with additional criteria so that proposals for redevelopment or change of use must demonstrate the absence of harm to the horseracing industry through the loss of the existing facility. Lambourn NDP Group (lpr1714) and Jockey Club Estates (lpr1907) comment more evidence required for consideration of businesses associated with the racing industry as do demands for suitable housing for racing staff. Whilst this policy sets out the Council's approach specifically to equestrian development, proposals for related development such as those providers of goods and services to the industry will be considered in accordance with Policy DM35. The LPR should be read as a whole. Further evidence on the contribution that the industry makes to the character of the area is available in the Landscape Character Assessment (2019). Supporting text amended to recognise the strong role of the horseracing industry in the district and past investments enhancing Lambourn's status within the industry. Comments concerning the increase in non-racing related events at Newbury Racecourse impacting neighbouring residents. When considering development proposals in support of events unrelated to horseracing industry, neighbourhood amenity will be considered and supporting text amended to reflect this.
DC35 Transport infrastructure	16	Comments generally supportive of Policy. Supporting text amended to be supportive of initiatives to develop and deliver a link from Newbury with the Hermitage to Hampstead Norreys active travel route. Policy and supporting text amended to include references to equestrian travel and the Kennet & Avon

		<p>towpath where appropriate. For the '15-minute neighbourhood' concept, supporting text amended so proposals to consider the need to reduce travel and, where possible, services and facilities located within an acceptable walking/ cycling distance of new places of employment or residences. Policy strengthened to reflect its contribution to addressing the climate emergency. The Council is supportive of a standardised approach to electric vehicle charging points provision, as is recognised in the supporting text that provision of EVCPs and infrastructure is now mandated as part of English Building Regulations. The Council is developing its own guidance to outline the requirements that developers will be expected to provide. Supporting text amended to reflect Ten Point Plan for a Green Industrial Revolution (November 2020) bringing forward the ban of sale of new petrol, diesel and most hybrid cars to 2030. The Council is aware of the issues surrounding electric scooters and that they may potentially, in time, become legal on the local highway network and will be undertaking a review of its Local Transport Plan following the LPR, likely considering the role of new technologies. Hermitage Parish Council (lpr1814) request a review of the traffic situation in Hermitage. Issues raised more appropriately dealt with by WBC's Traffic and Road Safety Team or via highways network management processes. Local highway, traffic management and safety issues would be considered as part of the Development Management process should further applications come forward. Any such required improvement identified through this process must be in accordance with this policy. Transport modelling has incorporated the combined impact of proposed new development through the plan period and detailed transport work for each development (where applicable) will come forward at the planning application stage. It is recognised many rural parts of the district have no or very minimal bus service. Due to difficulty in providing cost-effective transport in rural areas, the Council has encouraged and supported community transport and recently published a Bus Service Improvement Plan. This outlines that Demand Responsive Transport options are being investigated for rural areas where there are no bus services (e.g. between Hungerford and Lambourn).</p>
<p>DC36 Parking and Travel Plans</p>	<p>15</p>	<p>Mixed support in comments for Policy. Many comments that travel planning requires a separate policy due to its importance to spatial planning of new developments. The important role travel planning has to influence people's travel choices and behaviour is recognised, a separate policy for Travel Planning will be included in the Proposed Submission LPR.</p> <p>Comments objecting to inflexible and unrealistic car parking standards for households based on unrealistic current lifestyles and direct and indirect encouragement of car ownership and usage threatening net zero carbon target. And that there is no justification for excluding garages larger than the British Standard counting as parking spaces. Residential parking standards developed as part of the Council's Housing</p>

		<p>Site Allocations DPD, underpinned by a robust evidence base. Then considered at a Public Examination in front of a Planning Inspector in 2016. The Inspector concluded that the standards presented were sound, and were formally adopted by the Council in 2017.</p> <p>Suggestions that requirements for the most common forms of non-residential development should be given e.g. office and retail, considering existing car parks and the impact from occupants of the proposed development on vehicle numbers. It is recognised that the current non-residential standards are based on maximum standards and are now out of date. A set of new non-residential standards or guidance relating to how the LPA will approach their assessment will be developed in due course. Applicants must provide evidence to demonstrate whether there is sufficient existing spare car parking capacity that would be able to accommodate extra demand.</p> <p>Comments that there is no guidance from the Council on 'Electric Vehicle Charging Points for new development' and that the policy must be flexible to changes in technology. Provision of EV charging points and infrastructure is now mandated as part of English Building Regulations. The Council is currently developing its own guidance to outline the requirements that developers will be expected to provide. Proposals for charging points on the Strategic or Primary Road Network will be considered further as part of the review of the Council's Local Transport Plan, commencing in 2022.</p> <p>Guidance on the design and layout of car parking will be covered in the Council's emerging Highways Design Guide for Residential Development.</p> <p>The areas covered by the Zones in the residential parking standards have been reviewed to inform the Proposed Submission LPR. Whether an application is an exception case will be determined on a case-by-case basis.</p>
<p>DC37 Public open space</p>	<p>14</p>	<p>Comments received supportive. For many comments the Policy and the supporting text should be read in detail and in conjunction with other policies SP10, SP11 and DM15 and the Planning Obligations Supplementary Planning Document. SP10 Green Infrastructure amended in response to comments by the Mid and West Berkshire Local Access Forum (lpr1892) and British Horse Society (lpr881) that active travel should be encouraged to reduce car use and non-motorised active travel, including by horse, must be preserved and maintained, including public rights of way. Development proposals to take into account existing access network within and around the site. Opportunities to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. Additional connections and status upgrades to the existing rights of way network will be supported. Suggestions to include within policy the needs of dog owners were considered too specific. If appropriate additional guidance may be developed at a later date. Fowler Architecture and Planning (lpr1811)</p>

		comment the function and value of Accessible Natural Greenspace (ANG) in urban and rural areas should be recognised as a separate typology of open space that provides informal recreation in a natural environment where biodiversity enhancement is a key principle. Supporting text amended to include ANG.
DC38 Promotion of FTTP (fibre to the premises)	11	<p>Policy title amended to Digital Infrastructure to reflect changing technology.</p> <p>Comments supportive. Suggestion that it would be beneficial to support a wide range of fast internet and fibre to the premises (FTTP) should be mandatory in new developments. Through the Berkshire Digital Infrastructure Group, the Berkshire Unitary Authorities have set-out a “Connected Berkshire Vision and Strategy” to ensure that over 95% of households and business have access to full fibre coverage (providing Gigabit capable connectivity) and to eliminate all 4G poor coverage areas by 2025. The NPPF states Local Planning Authorities should support the expansion of electronic communications networks including full fibre broadband connections and have a crucial role in the deployment of fibre infrastructure as set out in the Government’s guidance ‘Digital and telecoms: resources for local authorities’. The guidance comments that local authorities can help to create incentives for future investment in digital infrastructure in their area by ensuring Local Plans effectively support it. To do this Local Plans can outline how planning policies will support the rollout of fixed and mobile infrastructure.</p>
DC39 Local shops, farm shops and community facilities	12	<p>Policy redrafted to more clearly reflect the policy requirements and the uses considered.</p> <p>Majority of comments received supportive. Several comments that current thresholds for local shops to provide to are too high and policy must define how the support for local shops increases with the number of dwellings, and phasing as well as reflecting the needs of the adjacent communities. A strategic approach must be defined that relates to developments that are on the scale of a new town. Strategic sites within the LPR have a site specific policy which sets out the detail in relation to the infrastructure provision for the site for example SP16 and SP17. Larger sites to be masterplanned and include necessary infrastructure to meet the needs of the proposed development, obsolete components of the policy therefore deleted and supporting text amended to clarify the policy relates to provision and retention of local community facilities in both new and existing communities. Suggestions that developers must provide more generous and flexible allocation of land for community facilities and provide it earlier in the build. Developer contributions are sought on most new development within the District. These contributions are sought in order to provide for additional facilities and infrastructure demands as a result of new development. Policy SP23 of the Emerging Draft LPR sets out the planning policy approach for infrastructure requirements and delivery. A new</p>



		policy is to be created on farm diversification in the Proposed Submission version.
<b>Appendices</b>		
Appendix 1 Monitoring & Delivery	2	Appendix to be provided in Proposed Submission LPR
Appendix 2 Evolution of the LPR	2	Appendix to be deleted
Appendix 3 Settlement Boundary Review	37	<p>Comments taken forward as part of the SBR.</p> <p>Comments generally supportive though concerns raised that settlement boundaries threatened the AONB and boundaries were elasticated to expand to further development, conflicting with current policies, principles and the community. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded. This makes clear that sites allocated through the LPR will be included within the boundary. Settlement boundaries have been drawn up through co-operation with parish/town councils and neighbourhood planning groups. The Council gave all town/parish councils and neighbourhood planning groups across the District an opportunity to undertake an initial review of boundaries, in February and March 2020 and again in March and April 2021, alongside the requests submitted by residents and other developers for small extensions to boundaries in some settlements. Maps of individual settlements showing finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The Council has taken a landscape led approach to the drawing of settlement boundaries. In relation to specific concerns about the proposed allocation at North East Thatcham, sites allocated through the LPR will be included within the boundary and are only allocated through the plan led process after a thorough site assessment and sustainability appraisal. For North East Thatcham the site assessment included a Landscape Sensitivity Assessment which is published as part of the evidence base for the LPR and which will provide context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals, therefore it is not possible to draw the settlement boundary any tighter at this stage. As the LPR progresses the boundary will be amended accordingly. A Landscape and Visual Impact Assessment (LVIA) will be to be required undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development,</p>

		design and layout of the site.
Appendix 4 AWE Policy Development Category Examples	2	The Appendix to be included in the Proposed Submission LPR will set out the land use planning consultation zones
Appendix 5 Critical Infrastructure Schedule of the IDP	6	Appendix to be deleted
Appendix 6 Existing Designated Employment Areas	4	A list of existing Designated Employment Areas (DEAs) was provided as part of the Emerging Draft Regulation 18 Local Plan Review (LPR) (Appendix 6) and will be updated to include new DEAs as listed in Policy SP21.
Appendix 7 Residential Parking Zones	2	Detailed issues only which are picked up in Appendix K
Appendix 8 How policies applied in NP context	1	Appendix to be provided in Proposed Submission LPR
Appendix 9 Schedule of policies to be superseded/ deleted	4	Issues raised covered in other areas of the LPR
Appendix 10 Glossary	2	The Proposed Submission LPR will include a glossary

All the detailed changes made to the Emerging Draft LPR can be found in the 'Tracked Changes' document which was published alongside the Proposed Submission LPR 2022-2039 when it was published for formal consultation on 20<sup>th</sup> January 2023.

Where changes had been made to the LPR, the SA/SEA was reviewed to see if the outcomes of the assessments had changed. This is detailed at the appropriate place within the SA/SEA Environmental Report which was published alongside the Proposed Submission LPR.

## 7. Consultation on Evidence Base and Supporting Documents

Where relevant, documents prepared as part of the [evidence base](#) have been subject to a specific consultation with technical experts, statutory bodies and other stakeholders as appropriate. Further details are set out in the individual documents themselves which are available on the Council's website.

## West Berkshire Local Plan Review to 2036

### Consultation on the West Berkshire Local Plan Review to 2036 Scoping Report and the Sustainability Appraisal (SA) Scoping Report

The purpose of this letter is to let you know that West Berkshire Council is reviewing its Local Plan to cover the period up to 2036. We have outlined our approach to the review in a Scoping Report. This sets out that the purpose of the reviewed Local Plan will be to assess the future levels of need for new homes and employment land and other land uses up to 2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.

At the same time, we also have to prepare a Sustainability Appraisal (SA) to accompany the Review. The SA process provides a means of translating sustainability objectives for the area into sustainable planning policies and should reflect global, national, regional and local sustainability problems and issues. It involves a series of stages by which the content of the emerging Local Plan Review is appraised against a series of sustainability objectives. The first stage of this is a SA Scoping Report which sets out the scope and overall level of detail of the SA. It also sets out our sustainability objectives.

We would welcome your feedback on our proposals and so comments are invited on both documents. Your comments should be submitted during the six week consultation period, running from Monday 12<sup>th</sup> February to 5pm on Monday 26<sup>th</sup> March 2018. They can be made:

**Online:** using the Council's Local Plan Consultation Portal

<http://consult.westberks.gov.uk/portal>

This is the easiest and most efficient way to make your representations.

or by **Representation Form:** available electronically on the Council's website <http://info.westberks.gov.uk/article/localplanreview2036> and through all libraries in the District and in hard copy at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. Completed representation forms can be returned:

- by email [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk); or
- by post to the Planning Policy Team, Development and Planning, West Berkshire District Council, Market Street, Newbury. RG14 5LD

All comments must be received by **5pm on Monday 26<sup>th</sup> March 2018**. Please note that all comments will be made available to the public to view and cannot be treated as confidential.

If you have any queries relating to this consultation, please do not hesitate to contact the Planning Policy Team at [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk) or 01635 519111.

Regards

Gary Lugg, Head of Development and Planning

*You have been sent this letter because you are either a statutory consultee, have previously made representations on the Local Plan or have asked to be kept informed. If you no longer wish to be contacted please let us know.*

## West Berkshire Local Plan Review (LPR) to 2036

### Scoping Report Consultation Statement

October 2018

#### Introduction

Between February and March 2018 the Council invited comments on the proposed scope and content of the Local Plan Review to 2036 (LPR). Comments were also invited on the accompanying Sustainability Appraisal (SA) Scoping Report

This statement sets out a summary of the comments received to this consultation, the Council's response and sets out the next steps in taking the LPR forward.

#### Local Plan Review Scoping Report

In all, there were 81 respondents to the consultation on the LPR scoping report with some respondents commenting on all questions and others only commenting on those questions of specific interest to them. A summary of the respondents' comments to each question is provided here, together with a summary of the Council's response, with the full comments provided in Appendix A.

#### **Q1 – Do you agree with the proposed scope of the review of the Local Plan? If not please tell us why and give reasons for your answer.**

*(Comments received = 56)*

The majority of respondents agreed with the proposed scope of the review and were clear in the need for it to be comprehensive and based on an up to date evidence base. They were also in agreement of the need to review the Council's housing requirement and spatial strategy, settlement hierarchy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.

There was a concern from a few respondents that the Scoping Report lacked sufficient evidence and context and that a further body of work should therefore be produced to enable more meaningful and constructive responses from stakeholders. The need for the Council to re-examine its approach once the revised NPPF and NPPG were published was also stressed. Housing need for instance will have to be assessed using the government's standard method contained in the revised NPPF. The need for the Council to work in cooperation with neighbouring authorities was also highlighted, especially if the revised NPPF confirms the need for Statements of Common Ground.

The length of the plan period was raised by a few respondents from the development industry. The review will need to plan for at least 15 years from its adoption and is

intended to cover the period to 2036. As the review is not anticipated to be adopted before the end of 2020 however, they felt that consideration should be should be given to adopting a plan with an end date of 2041.

One respondent from the development industry requested the Council provide greater clarity as to the extent of the review in dealing with a strategy for housing delivery in the short to medium term. They were not clear whether the scope of the review was to identify non-strategic sites as well as strategic sites. Another respondent also emphasised the need for there to be a clear distinction between strategic and local policies and that in order to achieve this, consideration should be given to preparing two separate plans, albeit in parallel and co-terminus. Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies such as the needs of the racehorse and equestrian industry. Some statutory consultees also drew attention to various requirements and other guidance that will need to be considered as the review progresses. One parish council expressed its disappointment that there was no real emphasis on likely changes to the way that people live their lives and their changing aspirations such as the impact that electric and possibly autonomous vehicles may have.

Some in the development industry highlighted the need for clarification around the approach the Council will take to housing in rural areas, particularly the need to achieve a good mix of smaller sites and the need to identify opportunities for villages to grow and thrive.

Other issues raised are considered under later questions.

**Q2 – Do you agree with the draft strategic objectives we have identified in Appendix 1? If not please tell us why and give reasons for your answer.**

*(Comments received = 56)*

Overall there was general agreement with the revised strategic objectives. As part of that support though there were a number of requests for the clarification of certain definitions and also suggestions for revised wording and the inclusion of specific issues. The importance of ensuring the objectives are consistent with those contained in other Council plans and strategies was stressed.

The inclusion of a vision for the Review was thought to be a useful as it would help set the objectives in context.

Several responses expressed concern that the objectives did not distinguish between urban and rural areas. It was felt that specific mention of rural communities would be helpful and would encourage the provision of housing and support economic growth in rural areas.

The need for the objectives to be written in order to deliver and manage growth over the plan period was highlighted, whether that be moving towards a low carbon economy, fostering economic growth, or the encouragement of leisure activities.

There was some discussion, particularly from the development industry about ranking of the objectives. Two developers felt that there should be a ranking of what they felt were the most valuable objectives (i.e. housing, climate change and sustainable and quality development), whilst a third felt there should be ranking that is reflective of the overarching objectives of the planning system.

Finally, there was also some overlap with issues considered in more detail under other questions such as:

- the need for an appropriate evidence base particularly for economy and green infrastructure;
- the need to meet the objectively assessed need over the Western Berkshire Housing Market Area;
- the need for the allocation of development sites of varying sizes;
- the need to meet the housing needs of key workers and other particular groups;
- to consider development needs and the provision of infrastructure in parallel. There was a feeling that the pressure on existing infrastructure was being overlooked and that infrastructure identified in the Infrastructure Delivery Plan has not delivered.

**Q3 - Do you think our existing spatial strategy (as set out in the Core Strategy) is the most appropriate for development to 2036? If not please tell us why and give reasons for your answer.**

*(Comments received = 47)*

The majority of respondents stated that they thought the existing spatial strategy had worked well and that it would continue to be the most appropriate approach for development up to 2036 in West Berkshire. With one exception, this included all parish councils and neighbourhood planning groups. The parish council that disagreed argued for further consideration to be given to garden villages where it felt that infrastructure needs and a community sense of place could be considered more holistically. The development industry highlighted the fact that the spatial strategy would need to be altered in order to accommodate a new settlement and were divided as to whether this was a good idea.

The capacity of the Eastern Urban Area to accommodate more growth was questioned, particularly the tension that exists between the need for development in the area and its location on the edge of the AONB. The role of Thatcham was also raised, with the expectation that following a period of restraint in the current plan, there was now an opportunity to plan for a period of growth.

There were some respondents who felt that whilst the spatial approach itself was acceptable in principle, the Council will need to re-examine the settlement hierarchy which supports it, in more detail, in order to establish the role and function of each settlement in each area. Specific concerns were raised, from both the development industry and some local communities that certain settlements were not now in the right category. Another suggested that a new category of 'principal rural service centres' could be introduced whilst others thought that smaller villages and the rural

areas themselves should also be included. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

It was generally considered that a review of settlement boundaries for all settlements will be an important part of the Review and that this process should then be used to inform the overall spatial strategy for the District. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions. Overall, the development industry felt the Council needed to be more flexible in its approach to rural settlements, particularly to those which currently sit below the current hierarchy. There were also suggestions from a few site promoters that more development, particularly in smaller villages, would help prevent the further loss of rural services.

#### **Q4 – Do you agree that dividing the District into different geographical areas is still the most appropriate way to deliver the spatial strategy?**

*(Comments received = 41)*

The majority of respondents, including parish councils and statutory consultees, stated that they felt dividing the district into geographical areas is still an appropriate mechanism to deliver the spatial strategy. They outlined that this approach is an effective way to meet housing need and it also takes into account the distinctive features and characteristics of the district, which allows policies to be focused and relevant rather than taking a broad brush approach. One parish council disagreed with this approach however, and responded stating that a more district wide approach should be adopted, but that the different characteristics of the district should be recognised among other equally important factors. One statutory consultee highlighted the need to carry out the sequential test for fluvial flood risk when considering the location of development.

Some of the development industry considered the geographical areas were appropriate as a broad objective but that it would need to be balanced against an amended settlement hierarchy. Some respondents took this further and felt that a more sophisticated method of assessing sustainability should be applied, and highlighted the settlement hierarchy itself as a more appropriate way to deliver the spatial strategy. The relationship between the spatial areas and the settlement hierarchy was strongly emphasised, with many highlighting the important role the settlement hierarchy plays in identifying sustainable locations for development. It was felt by some in the development industry that geographical areas would ensure that the supply of housing land in the district would not be over reliant on a small number of large scale strategic sites but allowed for an even spread of sites across the district. There was support from a landowner for retaining Newbury and Thatcham as a distinct area, and others stated that overlapping policies which subdivide requirements across areas should be avoided to ensure transparency. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions.

One landowner stated that dividing the district into geographical areas imposed arbitrary boundaries and distributing the housing requirement accordingly sits uncomfortably with the more strategic approach to planning which is emerging. It was outlined that geographical areas has the potential to lead to parochial decisions and compromise opportunities for sustainable patterns of growth. One of the responses from the development industry felt the Council had a tendency to apply these artificial boundaries too rigidly in plan making and decision-taking and that flexibility was required, especially with regard to allocating housing figures for each spatial area.

Potential growth at Grazeley raised concern among some respondents who felt that such growth should not restrict the growth of other sites within that spatial area. Specific concern was also raised by landowners as to how a new settlement would fit into the mechanism of dividing the district into geographical areas. The specific need to identify land in rural areas and on smaller sized sites, as set out within the draft NPPF was set out in the responses of some site promoters. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

**Q5 – Do you think there is a realistic opportunity for a large scale development to the south of Reading which could have the potential to be incorporated into the overall spatial strategy for the District? Please give reasons for your answer.**

*(Comments received = 49)*

Comments were divided on this issue. The majority of respondents who considered that there was potential for development in this area were cautious and felt it was dependent on a number of issues which would need to be resolved, some of which were potentially significant. These included the impact on infrastructure, especially the transport network; the amount of infrastructure that development would require; environmental constraints; AWE constraints; impact on green space and the impact on potential mineral sites.

Local communities who felt that would be directly affected by such a development in this area were not in favour of the proposal, citing similar concerns to those identified above.

Whilst acknowledging that development in this location could be seen as a strategic opportunity for authorities in the Western Housing Market Area some respondents felt that the area south of Reading has little, if any, functional relationship with the remainder of West Berkshire and that development in this location would serve to meet the needs of other authorities, namely Reading and Wokingham rather than West Berkshire. Others also felt that it would also undermine the viability and vitality of the existing settlement hierarchy in the District. At the same time, the risks of delivering through such a large strategic site were highlighted by those in the development industry, in particular the long lead in period for such a development. The need for the Plan to be flexible and to include a range of smaller sites across the



District which would be able to deliver at an earlier stage in the plan period was also emphasised by many in the industry.

**Q6 – Do you agree with our assessment of existing planning policies? Please give reasons for your answer. What do you think works well at the moment and what do you think we could do better? Please clearly identify the policy area or specific policy as a sub-heading.**

*(Comments received = 56)*

The majority of respondents agreed with the Council's aim to assess existing planning policies, including where there will be clarification for development management purposes (such as Core Strategy CS4). Some site promoters said that there was not enough information to be able to make an assessment of policies. Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies. This includes the needs of the racehorse and equestrian industry, flooding, heritage assets, transport, water infrastructure, sport and recreation, community/cultural facilities, the Kennet and Avon Canal, and the expansion of Theale rail terminal.

There was general consensus that appropriate extensions to sustainable settlements may be a way forward. Some respondents, notably from the general public, were concerned with a settlement boundary review, and were keen to ensure a balance is retained between smaller villages and the main towns in the District. The housing number going forward needs to be based on up-to-date evidence, and would need to include greenfield sites.

New Greenham Park and the Atomic Weapons Establishment were keen to see a new policy or amendment to CS9 to reflect the strategic importance of both areas of employment.

There was a suggestion that there should be a review of all site allocations in the Housing Site Allocations DPD, including a review of sites which have not been delivered. One respondent was concerned that the delay in delivering sites such as Sandleford was having the effect of developers submitting schemes for unallocated land outside of settlement boundaries (e.g. North Newbury).

Other comments received focus on including a policy for the redevelopment of redundant rural buildings, similar to Local Plan Policy ENV20; the clarification of green infrastructure; expanding Local Plan Policy ENV27 to include residential institutions for elderly care; that Core Strategy Policy CS16 should recognise any public benefits of development through flood risk management and mitigation; for Core Strategy CS6 to take into account the changes to the definition of affordable housing outlined in the NPPF; and for a review of retail centres to take into account available evidence.

**Q7 – Are there any other policy issues that you think should be considered as part of the review of the Local Plan? If so, what are they and tell us why you think they should be included.**

*(Comments received = 56)*

There was a wide range of responses to this question, and a common theme of responses related to the need for policies on health and wellbeing and sports and recreation, for elderly people's accommodation/extra care accommodation, and for community and cultural facilities. In terms of community and cultural facilities this focused on not only the protection but also the provision of such facilities, including churches, community halls, cinemas, theatres, pubs and music halls. One respondent suggested that development with any kind of community benefit should be allowed.

In terms of housing growth Thatcham should now be considered as a suitable location for allocations. There is a suggestion of allocating omission sites or 'back up' sites in the event where sites are not delivering the houses as envisaged, or there are other factors which influence the progress (e.g. economics). One respondent considered that the allocation of sites should concentrate on infilling and brownfield sites before greenfield sites. A respondent commented that there should be consideration of the 20% of housing allocations on sites less than 0.5 hectares, as per the revised NPPF. Similar to the respondents to question 6 there was consideration of the extension of sustainable settlements and the allocation of 'semi-rural' sites, and for the inclusion of a policy akin to former Local Plan Policy ENV20 for rural businesses.

Infrastructure was highlighted by respondents, with a statutory consultee encouraging a policy on water supply and wastewater. Footpaths, street lighting, health provision and educational establishments were also highlighted. Conversely, one respondent commented that if the housing and industry is planned correctly then leisure, health and cultural facilities will naturally develop.

When considering landscape, biodiversity and heritage there was comment that there should be a strengthening of policy on light pollution and the governance of external lighting, particularly in the AONB; that there should be a protection of irreplaceable habitats such as ancient woodland, and of watercourses; there should be a definitive definition of 'Green Infrastructure', which should encompass 'Blue Infrastructure'; and that there should be consideration of further detail of heritage assets.

When considering human health an internal consultee noted that a priority of the Council is for the protection and improvement of local air quality. Therefore, updating the policy for pollution and noise in line with new guidance is needed, rather than relying on the now deleted planning policy guidance notes.

There were queries about the duty to cooperate and taking on unmet need from surrounding authorities; housing affordability; and whether West Berkshire Council aim to boost the supply of housing when looking at the SHMA and Government target figures.

## **Sustainability Appraisal Scoping Report**

*(comments received = 207)*

The Scoping Report contained ten questions primarily relating to the quality of data contained with the report. In all, there were 27 respondents to the consultation on the local plan review scoping report with some respondents commenting on all questions and other only commenting on those questions of specific interest to them. A summary of the respondents' comments to each question is provided here, with the full comments provided in Appendix B.

There was an overall consensus that the baseline information was adequate with some exceptions relating to the age of some data and the paucity of data on green infrastructure, tourism and recreation, and the racehorse/equestrian industry. There were many useful suggestions to tighten up the evidence.

Overall there was general agreement with the key sustainability issues and objectives identified. A number of refinements were suggested from statutory bodies and 'tourism' proposed as an addition. Ranking the objectives was not seen as helpful.

There was some overlap with the issues raised under the Local Plan Review Scoping Report, including:

- the timescale of the Review;
- the justification for any large scale development to the south of Reading;
- an endorsement of cross boundary working;
- favouring large site allocations in and around urban areas as the most "sustainable locations" and in contrast;
- the benefits of allocating smaller sites adjacent to smaller sized settlements as a potential strategy for aiding housing delivery and supporting sustainable development in rural areas;
- the need for a settlement boundary review;
- a greater commitment to fulfil the unmet housing need from neighbouring authorities, especially Reading;
- the need for an overall vision to provide context and sense of direction;
- the weight to be given to the draft and final versions of the revised NPPF;
- the need to present housing numbers by spatial area;
- the provision of housing for younger people and affordable housing;
- the provision of necessary infrastructure with the developments, including implications of electric/zero carbon technological developments.

## **Summary of Council Response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). The Council will need to prepare the Review to conform to the revised national policy in the NPPF published

on 24th July 2018. Detailed comments made will be taken forward in the development of the spatial strategy and both strategic and local policies as appropriate.

It is encouraging to see that there is general agreement with the proposed scope of the Review. The importance of an adequate, up to date and relevant evidence base is acknowledged as is the need to undertake the LPR in close cooperation with our neighbouring authorities.

The Council agrees that the inclusion of an overarching Vision would be particularly helpful and assist in setting the Strategic Objectives in context.

The general agreement amongst respondents with the draft strategic objectives is welcomed. It is acknowledged that they are broad and wide ranging and that is some overlap between them. In this context some definitions, such as culture and heritage, are also used in their broadest sense. The strategic objectives apply across the whole of the District, in both urban and rural areas. Although some respondents proposed a ranking of the objectives the Council does not consider, in the interests of sustainable development, that that would be appropriate.

The objective on housing is to ensure that the assessed need for market and affordable housing up to 2036 will be met. Housing need will be assessed using the government's standard method contained in the revised NPPF and PPG. This assessment will use the most up to date household projections as a starting point and the resultant need figure is considered to represent the minimum requirement to be included within the Local Plan Review to 2036. This figure will supersede the OAN in the 2016 Berkshire SHMA. The LPR will set out the strategy to meet this revised requirement. It will consider both strategic and non-strategic growth opportunities to meet the need over the plan period, including housing in rural areas of the District. The HELAA will provide evidence of growth opportunities in the area and will identify sites that have potential for development to inform the spatial strategy. Most of the sites that will be included were submitted through the Call for Sites (December 2016 to March 2017), through which agents and the public were invited to submit sites that they considered developable.

The LPR will contain a housing trajectory as required by national policy, although a trajectory can only represent a point in time and will be subject to review through the Annual Monitoring Report.

The support given to the continuation of the existing spatial strategy is welcomed but the capacity of the Eastern Urban Area to accommodate future growth is an issue which requires further consideration. The Council will therefore review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries.

A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018. It is intended that all settlement boundaries are reviewed as part of the Local Plan Review.

The four Western Berkshire authorities are committed to meeting the housing requirement across the Western Housing Market Area. To this end the Councils have agreed a Memorandum of Understanding which states that the four authorities will continue to work together to ensure that local plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need in Reading.

The Council acknowledges that large new settlements are not without their problems and in seeking to identify land for new homes national policy notes the importance of identifying a mix of sites across the District. Should development be considered appropriate at Grazeley, given the strategic nature of the site, any development would be delivered in partnership with Wokingham Borough Council. Reading Borough Council would also be involved in the process. It would require comprehensive masterplanning to ensure that it was delivered in the most sustainable way and part of this would involve a detailed transport assessment of the existing network. Given that such a large scale development would likely impact significantly on the existing network, developer contributions from the development would go directly to funding any improvements required. A detailed assessment of the green infrastructure would also be required, including the identification of any suitable alternative greenspace (SANG). There would be a need for extensive consultation with AWE Burghfield and the Office for Nuclear Regulation (ONR) to ensure that any development was compatible the facility at AWE Burghfield and delivered in conformity with the Detailed Emergency Planning Zone (DEPZ).

### **The next steps**

Following an analysis of the responses received on both the Local Plan Review and SA Scoping Reports the Council will now:

- Create a vision for how West Berkshire should look in 2036 which will provide the context for the Strategic Objectives
- Finalise the Strategic Objectives
- Consider the overall strategy for the pattern and scale of development across the District. As part of this we will:
  - review the existing strategy and identify the direction we intend to take at both a strategic and local level in accordance with the revised NPPF;
  - review the character of and evidence we have for the existing spatial areas and whether we can introduce flexibility by reviewing boundaries. We will set this out in a topic paper which we will consult upon in November/December 2018;
  - review the spatial distribution of development across the District. This will include:

- consideration of how we meet the need for housing and employment land to 2036 through a review of the settlement hierarchy and settlement boundaries. We will firstly look at producing a methodology for the review of the settlement hierarchy and also produce criteria for a review of settlement boundaries which we will consult upon in November/December 2018;
  - analysis of sites being promoted for development through the HELAA and, as part of this, the identification of potential broad locations for development. In June/July 2019 we will publish a list of all sites that have been submitted to us for consideration and invite comments on the suitability of those sites for development.
- Continue to update the evidence base to inform the Review. Where appropriate we will publish updated documents for information when we undertake further public consultation in November/December 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q1: Do you agree with the proposed scope of the review of the Local Plan? If not please tell us why and give reasons for your answer.**

Number of responses received: 56

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	Broadly agree
Public Transport Team West Berkshire Council	I agree with the proposed scope of the review of the Local Plan and note that it is not the purpose of this review to change or remove policies that seek to support the delivery of sustainable development.
<b>Statutory consultees</b>	
Hampshire County Council	We agree with the proposed scope of the review of the Local Plan.
Stratfield Mortimer Parish Council	<p>The proposed scope of the review seems to cover all the areas most directly linked to the planning process. However, there seems to be no real emphasis on likely changes to the way that people live their lives and their changing aspirations.</p> <p>For example, there is now general recognition that before the end of the plan period electric vehicles and possibly autonomous vehicles will form a majority of the vehicle on the roads. This will have a major impact on how people will carry out day to day tasks and on the required transport infrastructure, and hence such factors should be considered in the roll forward of the LDP.</p> <p>Of course, nobody can accurately forecast future developments but in many areas the direction of travel is clear and these should be examined for their impact on planning policy. If this is not done there is a danger, to quote an old adage, that the Generals will be fighting the last war.</p>
Newbury Town Council	<p>The current position of the Town Council on the direction that Newbury should take over the Plan period is represented by the Draft Newbury Town Plan 2019-36, recently approved by the Town Council for consultation by the public and West Berkshire Council. After the consultation ends on 18th March, a final version will be adopted.</p> <p>The Newbury Town Plan is the Town Council's recommended replacement for ADPP2 (with regard to Newbury) in the present Local Plan.</p>

Respondent	Response
Thatcham Town Council	Yes
Holybrook Parish Council	Holybrook Parish Council agree with the proposed scope of the review of the local plan and believe that the report has value.
Pangbourne Parish Council	It covers all the main policy issues so I agree with its scope
Burghfield Parish Council	Yes
Burghfield NDP Group	Yes
Environment Agency	This question is not within our remit to answer but we welcome the opportunity to comments on the local plan policies and objectives at an early stage in the local plan process. We also expect to be consulted on the local plan evidence base such as the Strategic Flood Risk Assessment (SFRA) the flood risk sequential test and the water cycle study.
Historic England	<p>The scope of the Local Plan Review will naturally be wide, but as the Government’s advisers on the historic environment, we have confined our comments to our remit, and are pleased to make the following general and specific comments. The National Planning Policy Framework (NPPF) makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainable development and sets out a number of specific requirements for the historic environment in local plans. Local plans should:</p> <ul style="list-style-type: none"> <li>• set out a positive strategy for the conservation and enjoyment of the historic environment [126];</li> <li>• include strategic policies to deliver the conservation and enhancement of the historic environment [156];</li> <li>• contain a clear strategy for enhancing the natural, built and historic environment [157];</li> <li>• identify land where development would be inappropriate, e.g. for its environmental or historic significance [157];</li> <li>• be based on adequate, up-to-date and relevant evidence about the historic environment [158 and 169].</li> </ul> <p>It should be noted that the definition of “historic environment” in the NPPF is wide-ranging, encompassing more than just the built environment: “All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.”</p> <p>Although the last of the requirements above, an adequate, up-to-date and relevant evidence base to underpin the strategy and policies of the Local Plan is really the starting point. When gathering evidence, it is important to bear in mind that this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (i.e. the significance) of sites both known (such as those on the National Heritage List for England, see <a href="http://www.HistoricEngland.org.uk/listing/the-list">www.HistoricEngland.org.uk/listing/the-list</a>) and potential, without which an understanding of the sometimes subtle qualities of the local distinctiveness and character of the local area may be easily lost. In particular:</p> <ul style="list-style-type: none"> <li>• In some cases, it might be necessary to identify heritage assets outside a local authority area, e.g. where there are likely to be setting impacts caused by potential development proposals within that area.</li> </ul>



Respondent	Response
	<ul style="list-style-type: none"> <li>• Some asset types are not currently well-recorded. The Register of Parks and Gardens of Historic Interest in England, for example, is thought to represent only around two-thirds of sites potentially deserving inclusion.</li> <li>• Evidence gathering can help identify parts of a locality that may be worthy of designation as a Conservation Area, or may merit local listing.</li> <li>• Assessing the likelihood of currently unidentified heritage assets being discovered, particularly sites of historic and/or archaeological interest, will help to future proof the plan.</li> </ul> <p>It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required.</p> <p>What historic environment evidence does the Council have in addition to the National Heritage List for England, Historic England’s Heritage at Risk Register and the Berkshire Historic Environment Record? Conservation Area Character Appraisals? Historic Landscape Characterisation? Is there a list of locally important heritage assets? Has the Council undertaken a survey of grade II buildings at risk? Is there an Extensive Urban Survey and/or Urban Archaeological Database. Are there any bespoke studies such as archaeological assessments or Tall Buildings studies?</p> <p>We will expect the Council to have an adequate, up-to-date and relevant historic environment evidence base and to demonstrate in the Local Plan how that historic evidence base has informed and influenced the Plan’s policies and site allocations.</p> <p>If the evidence base for the historic environment is weak, the Council may need to commission proportionate research, for example:</p> <ul style="list-style-type: none"> <li>• detailed historic characterisation work assessing the impact of a proposal for a major urban extension or rural development;</li> <li>• visual impact assessments, considering the potential impact of allocations upon the setting of important heritage assets;</li> <li>• seeking the views of the local community about what they value about the historic environment of their local area (NPPF, Paragraph 155); and/or</li> <li>• an appropriate archaeological assessment to consider whether heritage assets with archaeological potential are likely to be present in areas where the HER indicates that there has been little or no previous investigation.</li> </ul> <p>Work in putting together Local Plans will often generate new evidence of the state and significance of the historic environment. Documents, such as historic landscape characterisations, strategic environmental assessments, conservation area appraisals, economic development studies and those supporting supplementary planning documents and local listing assessments, will often contain new evidence.</p> <p>Local planning authorities will find it useful to collect this information and make it publicly available, including through the Historic Environment Record. The information can be invaluable in improving plan-making and decision-making in the future and is of significant public benefit in furthering the understanding of our surroundings and our past.</p> <p>The evidence base for the historic environment may also assist with the preparation of the following:</p> <ul style="list-style-type: none"> <li>o assessments developed to meet the goal of achieving economic, social and environmental gains jointly and simultaneously;</li> <li>o the Sustainability Appraisal which accompanies the Local Plan; and</li> </ul>

Respondent	Response
	<p>o appropriate indicators for monitoring the delivery of the Plan</p> <p>As regards the required positive strategy for the conservation and enjoyment of the historic environment, the NPPF advises that, in developing this strategy, local planning authorities should take into account:</p> <ul style="list-style-type: none"> <li>● the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</li> <li>● the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</li> <li>● the desirability of new development making a positive contribution to local character and distinctiveness; and</li> <li>● opportunities to draw on the contribution made by the historic environment to the character of a place.</li> </ul> <p>We consider that the positive strategy for the conservation and enjoyment of, and the clear strategy for enhancing, the historic environment required by the NPPF, is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.</p> <p>This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places. As part of a sound conservation strategy, policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, paragraph 8).</p> <p>We also consider that the positive and clear strategy should comprise recognition throughout the Plan of the importance of the historic environment, of the historic environment's role in delivering the Plan's vision and the wider economic, social and environmental objectives for the Plan area, and of the potential impacts of the Plan's policies and proposals on the historic environment.</p> <p>Consequently, the local plan might need to consider the inter-relationship of the objectives for the historic environment with the following issues of local importance:</p> <ul style="list-style-type: none"> <li>● Building a strong, competitive economy – How might the plan conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?</li> <li>● Ensuring the vitality of town centres and villages – What role can the historic environment play in increasing the vitality and attractiveness of town and village centres?</li> <li>● Supporting a prosperous rural economy – What opportunities does the reuse or adaptation of traditional buildings provide for supporting the rural economy or providing homes for local people? What potential is there for new heritage-led tourism initiatives?</li> <li>● Promoting sustainable transport – How might new or improved roads and other transport infrastructure be delivered in a manner which also conserves the historic environment of the area? Could the introduction of sustainable transport initiatives offer related opportunities for heritage through improving street/ traffic management or public realm enhancement at the same time?</li> <li>● Delivering a wide choice of high quality homes – How might the plan encourage adaptive reuse of historic buildings? How might new residential developments best be integrated into historic areas?</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>● Requiring good design – How might the defining characteristics of each part of the plan area be reinforced in the approach to design?</li> </ul> <p>In formulating the strategy we consider it is advisable and often necessary to consider the following factors:</p> <ul style="list-style-type: none"> <li>• How the historic environment can assist the delivery of the positive strategy and the economic, social and environmental objectives for the plan area (NPPF, paragraphs 126 and 132 and Sections 66 and 72 of the Planning (Listed Buildings &amp; Conservation Areas) Act 1990);</li> <li>• How the plan will address particular issues identified during the development of the evidence base, including heritage at risk and the reuse of buildings;</li> <li>• The location, design and use of future development and how it can contribute to local identity and distinctiveness;</li> <li>• The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, social and cultural assets, town centres and climate change mitigation/adaptation (NPPF, paragraph 126);</li> <li>• The means by which new development in and around designated heritage assets might enhance or better reveal their character and significance (NPPF, paragraph 137);</li> <li>• The means by which new development in Conservation Areas and within the setting of heritage assets might enhance or better reveal their significance (NPPF, paragraph 137);</li> <li>• How Historic Environment Records and local lists might assist in identifying and managing the conservation of non-designated heritage assets;</li> <li>• How the archaeology of the plan area might be managed;</li> <li>• The possible role for CIL and/or s106 in delivery of required infrastructure;</li> <li>• Whether master plans or design briefs need to be prepared for significant sites where major change is proposed;</li> <li>• What implementation partners need to be identified in order to deliver the positive strategy;</li> <li>• What indicators should be used to monitor the heritage strategy's effectiveness; and,</li> <li>• In order to deliver an effective strategy for the conservation of the historic environment, is there a need for the plan to include Development Management Policies and where appropriate specific policies for specific assets or specific areas within the plan area? (Further comments on this matter are set out later in this letter)</li> </ul> <p>The National Planning Policy Framework requires, in paragraph 126, local planning authorities to set out in their local plans a "positive strategy for the conservation and enjoyment of the historic environment". Paragraph 157 of the Framework requires local plans to contain a "clear strategy for enhancing the.....historic environment" and paragraph 156 requires local plans to contain strategic policies "to deliver.....the conservation and enhancement of the.....historic environment".</p> <p>We consider the words "positive", "enhancing" and "deliver" are significant, and we believe that the Plan (and Council) should be proactive in the conservation and enhancement of the historic environment. National Planning Practice Guidance states "Such a [positive] strategy should recognise that conservation is not a passive exercise", whilst paragraph 9 of the NPPF explains that "pursuing sustainable development involves seeking positive improvements in the</p>

Respondent	Response
	<p>quality of the built, natural and historic environment”. Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives.</p> <p>We therefore look to local plans to contain commitments to positive measures for the historic environment e.g. a programme of completing and reviewing conservation area appraisals, the implementation of Article 4 Directions where the special interest of a conservation area is being lost through permitted development, the completion of a list of locally important heritage assets or a survey of grade II buildings at risk.</p> <p>The Council should assess whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157). This might include, for example, tall buildings within identified sensitive view corridors.</p> <p>The plan will be the starting point for decisions on planning applications, and neighbourhood plans are only required to be in general conformity with the strategic policies of the Local Plan (NPPF, paragraph 184). Consequently, sustainably managing the historic environment is best achieved by identifying clear strategic policies to deliver the conservation and enhancement of the historic environment, as also required by paragraph 156 of the National Planning Policy Framework. We will therefore look to the Local Plan Review to contain a strategic policy for the conservation and enhancement of the historic environment.</p> <p>We encourage the inclusion in local plans of specific development management policies setting out the requirements of development proposals and providing a clear indication of how a decision maker should react to a development proposal affecting a heritage asset or assets as required by paragraph 154 of the NPPF, particularly in the following circumstances:</p> <ul style="list-style-type: none"> <li>● Those areas where Development Management Policies are necessary to amplify a general, overarching, Strategic Policy for the historic environment – for instance, to deal with particularly distinctive or important historic environment features or significance (this would be particularly relevant for the Local Plan Review);</li> <li>● Those areas where further clarity would be useful – for instance, how the Council will determine applications affecting archaeological remains of less than national importance;</li> <li>● Those areas where Development Management Policies may be necessary to address the local circumstances of the Plan area - for example, to clarify the approach to development within an Archaeological Notification Area, or to protect or enhance important views and vistas;</li> </ul> <p>This policy or policies should include criteria for assessing the potential impact of development proposals on the significance of all relevant heritage assets: designated assets such as listed buildings, Scheduled Monuments, conservation areas and Registered Historic Parks and Gardens, and non-designated assets, such as those of local significance (as identified on local lists), archaeological deposits (as identified on the Berkshire Historic Environment Record) and historic landscapes (as identified in the West Berkshire Historic Landscape Character Assessment).</p> <p>The policy or policies should identify those particular characteristics of each type of heritage asset that should be protected or enhanced through development proposals. Further advice on considerations for heritage assets in development management policies is set out in an appendix to this letter.</p>

Respondent	Response
	<p>The development management policy or policies should reflect the requirement in paragraph 132 of the NPPF that any harm or loss of a heritage asset should require clear and convincing justification, most often in the form of public benefits. In accordance with paragraphs 132 -135 of the NPPF, the more important the asset, the greater the weight that should be given to its conservation – the greatest weight should be given to designated heritage assets of the highest significance, then other designated assets, then non-designated assets (including archaeological remains, except those that are demonstrably of equivalent significance to designated heritage assets, which should be considered subject to the policies for designated heritage assets).</p> <p>We would expect the development management policy or policies to set out what is required of applicants e.g. “Applications which affect, or have the potential to affect, heritage assets will be expected to;</p> <p>i) describe the significance of the asset and its setting, using appropriate expertise; at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal; using appropriate references such as the Historic Environment Record and, if necessary, original survey (including, for assets of archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation); and</p> <p>ii) to set out the impact of the development on the heritage assets and a suggested mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets as well as recording loss and advancing knowledge.</p> <p>Where development is permitted that would result in harm to or loss of the significance of a heritage asset, developers will be required to record and advance understanding of the significance of that asset, in a manner appropriate to its importance and the impact, and to make that evidence publicly accessible.”</p> <p>The NPPF requires the positive strategy for the conservation and enjoyment of the historic environment to include heritage assets most at risk through neglect, decay or other threats.</p> <p>It should be noted that outside London the Register does not include grade II listed secular buildings at risk, and that other heritage assets may become at risk during the life of the Local Plan. We therefore suggest including wording within local plans along the lines of:</p> <p>“The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers”.</p> <p>We have produced a revised Good Practice Advice Note: 1: “The Historic Environment in Local Plans”, available on the Historic England website: (<a href="http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a>) which provides advice on the matters considered above.</p> <p>As regards site allocations, whatever the potential sources of land for development, Historic England will expect the selection of sites to be allocated for housing (or any development) to be based on, inter alia, full and proper consideration of the potential impacts of development on the historic environment; in particular on heritage assets and their setting, and the need to conserve and enhance those assets. This will require the use of a comprehensive historic environment</p>

Respondent	Response
	<p>evidence base as explained earlier in this letter, including specific studies to understand the significance of assets that may be affected.</p> <p>We have prepared specific advice on The Historic Environment and Site Allocations in Local Plans, <a href="http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a>. Advice on the setting of heritage assets is given in Historic England’s Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (<a href="http://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">http://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>).</p> <p>We will expect the Council to demonstrate how the historic environment has influenced its choice of sites (including those for gypsies and travellers), and to set out detailed overriding justification if it proposes the allocation of any sites that would have an adverse impact on a heritage asset or assets.</p>
Sport England	Yes, carrying out a review will focus where any additional work is required
Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In the case of West Berkshire this relates to the M4 and A34.</p> <p>We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in West Berkshire without careful consideration of mitigation measures. It is important that the DPD provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.</p> <p>When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. In general we will support a local authority proposal that considers sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.</p> <p>I have included below link to the M4 J3-12 Smart motorway project, where you can find more information and sign up for updates:  <a href="http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/">http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/</a></p> <p>For background, you may be interested to read “<i>The Strategic Road Network Planning for the Future</i>” which is a guide to working with Highways England on planning matters. Please see:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf</a></p>
Savills (UK) Ltd for Thames Water Utilities Ltd	No objection
<b>General consultation bodies</b>	

Respondent	Response
Theatres Trust	Yes
Mid & West Berks Local Access Forum	We recommend close liaison with Local Transport Plans and Active Travel Plans because the infrastructure to encourage Active Travel (ie non-motorised travel for utility & recreational purposes) needs to be recognized and incorporated into Local Development Plans.
British Horse Society	<p>Yes. The Society is pleased to see that it is proposed to include reference to the Equestrian / Racehorse industry (often referred to the Horse Industry) in the new plan. We believe this is an important aspect to the West Berks community and hope a robust policy will be developed in the new plan to ensure the equestrian economy and community flourishes in West Berks.</p> <p>We have often referred other local authorities to the existing West Berks Local Plan as a good example of recognizing the value of the horse industry in their areas.</p> <p>As the BHS Access &amp; Bridleways officer for West Berks, I have to constantly argue for inclusion of provision for horses when new paths &amp; routes are being proposed. This should be automatic unless it is a completely urban environment where horses are unlikely to need access. This is particularly so when dealing with Council's Highways depts.</p> <p>Walking and cycling strategies do not cover equestrian needs and often impinge on them. An assessment of equestrian needs should be made to ensure that the horse industry can thrive.</p>
Reading Gospel Hall Trust	Broadly, yes
<b>Other stakeholders</b>	
Robert Wallace	Not exactly thinking outside the box but I guess you have to start somewhere
David Lister	Yes
David Parry	This whole exercise worries me as it appears to be based on a study of housing needs before the referendum for leaving the EU. That potentially changes the housing demand with changes to immigration policy, but until it is all resolved then nobody knows the projected population numbers and hence housing demand to 2036!
William Graham	Yes
Neil Richardson	Appears to cover main areas of concern but not enough information on need for large scale development south of Reading.
Christopher Gent	We agree with the scope of the plan
<b>Landowners, site promoters and developers</b>	

Respondent	Response
Barton Willmore for Graham Child	<p>As an overall observation we would note that the Scoping Report lacks sufficient evidence and context. Consequently, we would expect to see a further body of work produced prior to the next consultation, to enable more meaningful and constructive responses from stakeholders. We note the Council's intention for this to be a Local Plan Review, rather than a new Local Plan in its entirety, however it is not considered sufficient evidence has been supplied to accurately assess how this may come to fruition, with regard to existing policies.</p> <p>Notwithstanding the above, our client is in broad support of the scope of the review of the Local Plan, as highlighted at paragraph 3.2 in the Scoping Report. In particular our client notes that the current adopted Development Plan consists of planning policies which are not reflective of the most up to date evidence of need. For example the housing requirement of 10,500 contained within the Core Strategy is based on the now revoked South East Plan requirement of 525 dwellings per annum. This is inconsistent with the requirements of paragraph 47 of the National Planning Policy Framework 2012 (NPPF) which requires local authorities to:</p> <p><b><i>“use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing, in the housing market area...”</i></b></p> <p>It is noted that the Draft Revised National Planning Policy Framework was published on 5th March, however this also states at paragraph 11, that:</p> <p><b><i>“b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas...”</i></b></p> <p>Our client also notes that although the Council produced their Housing Site Allocations Development Plan Document (HSA DPD) in May 2017, this does not supersede the Core Strategy and therefore does not take account of the most up to date evidence of need, instead the HSA DPD sits as a daughter document to the Core Strategy.</p> <p>As a consequence our client notes that a Local Plan and associated policies which reflect a national policy compliant housing requirement is long overdue and welcomes the Local Plan Review, insofar as it seeks to specifically address this issue, inter alia. Our client notes however that the most up to date assessment of need is considered to be the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) 2016. However, we note that this document is yet to be tested at a Local Plan Examination and may indeed require updating itself.</p> <p>Our client would suggest therefore that the planned review of existing policies should not simply be taken in relation to whether they accord with national policy, but also whether they accord with the objectively assessed need, insofar as they allow sufficient sites to be brought forward.</p> <p>In line with the above, our client wishes to invite the Council to consider their land at Pangbourne Hill which is available in the short to medium term to deliver circa 41 homes, straddling the currently defined development boundary of Pangbourne. The site accords with the Council's current spatial strategy, however its delivery is affected by the restrictions imposed by policy C1 of the HSA DPD. It is considered that this may not be an isolated case and the Council should therefore look holistically at the policies and settlement boundaries across the district, to ensure sustainable sites able to contribute to the Districts housing requirement.</p> <p>Given our client's site is located within the North Wessex Downs AONB, to assist the Council with regard to the technical suitability of their site, these representations are accompanied by a landscape opportunities and constraints plan.</p>



Respondent	Response
	<p>Moreover, from these conclusions a capacity plan has been constructed, to ensure that the figures quoted are an accurate representation of achievability and to demonstrate to the Council how many dwellings the site is realistically able to accommodate.</p>
Barton Willmore for Sulham Estate	<p>Our initial comment which we request is noted throughout these representations is that the Scoping Report lacks sufficient evidence and context. As such, before confirming support to any element of the Local Plan Review, we would require more information as to the Council's understanding of the issues and options within the District. Consequently, we would expect to see a further body of work produced prior to the next consultation, to enable more meaningful and constructive responses from stakeholders. We note the Council's intention for this to be a Local Plan Review, rather than a new Local Plan in its entirety. However, it is not considered that sufficient evidence has been supplied to accurately assess how this will be prepared with regard to existing policies.</p> <p>Notwithstanding the above, we are supportive of an update to the Council's existing Development Plan. In particular, we note that the current adopted Development Plan consists of planning policies which are not reflective of the most up to date evidence of need. For example, the housing requirement of 10,500 contained within the Core Strategy is based on the now revoked South East Plan requirement of 525 dwellings per annum. This is inconsistent with the requirements of paragraph 47 of the National Planning Policy Framework 2012 (NPPF) which requires local authorities to:</p> <p><b><i>"use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing, in the housing market area..."</i></b></p> <p>It is noted that the Draft Revised National Planning Policy Framework was published on 5th March, however this also states at paragraph 11, that:</p> <p><b><i>"b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas..."</i></b></p> <p>Whilst we note that the Council have recently prepared and adopted their Housing Site Allocations Development Plan Document (HSA DPD) (May 2017), this does not supersede the Core Strategy and therefore does not take account of the most up to date evidence of need.</p> <p>Consequently, we welcome this Local Plan Review and the opportunity this affords the council to develop a plan that is compliant with national housing policy. With this in mind, we note that the most up to date assessment of need is considered to be the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) 2016. However, we note that this document is yet to be tested at a Local Plan Examination and may indeed require updating itself.</p> <p>The Council's awareness of accurate and fully up to date levels of need is instrumental to the review of existing policies. We would therefore suggest that the planned review of existing policies should not simply be taken in relation to whether they accord with national policy, but also whether they accord with the Council's responsibility in national policy to, as a minimum provide for objectively assessed needs.</p> <p>With this in mind, these representations and suite of supporting documents present the benefits of our client's site, land at Hall Place Farm Tilehurst, as a sustainable location for residential development of up to 80 dwellings which is deliverable with the short to medium term and able to make a positive contribution to West Berkshire meeting its housing needs.</p>

Respondent	Response
	<p>Despite the sustainable location of the site which is very well positioned in terms of local schools and public transport links, its delivery would be affected by the restrictions imposed by policy C1 of the HSA DPD as it is outside the settlement boundary. Within this in mind, we suggest that the Council take a holistic approach to reviewing settlement boundaries as these could be restricting the delivery of sustainable sites which could contribute to the housing requirement.</p> <p>In addition to Land at Hall Place Farm falling beyond the settlement boundary, the site is also within the North Wessex Downs AONB. Accordingly, there representations are supported by a Landscape Capacity Assessment which concludes that the parcel has the potential to accommodate residential development due to the influence of existing suburban fringe characteristics including the built form within the site and the existing settlement edge which is adjacent.</p>
Bewley Homes	<p>Whilst we agree with the scope of the review it is essential that the evidence base is both robust and up to date. When calculating future housing need for the borough regard should be had to the changing national guidance including any implication arising from the standard methodology and determine whether these are robust and fit for purpose when planning for future dwelling requirements in West Berkshire.</p> <p>It is also recognised that the Housing Market Area is very large and that there are relationships between authorities both within the HMA and beyond that could have implications on future housing need within the borough. It is a requirement that West Berkshire Council engages in discussions with adjoining authorities to be aware of any implications this has on housing need.</p>
Mark Carter for Mr R.L.A. Jones	<p>The Respondent welcomes the Review, and the scope of it, which includes a review of the overall housing requirements, the existing spatial strategy for the District, and a review of all existing housing allocations. However given that the new Local Plan will cover a further 10 year period from 2026 to 2036 it should be explicitly stated that new housing site allocations will be needed to meet the future levels of housing need. The Respondent has an interest in land at welcomes further housing sites in Lambourn including that previously identified as LAM007 “land between Folly Road, Rockfel Road and Stork House Drive”.</p>
Carter Jonas for Hermitage Farms	<p>Hermitage Farms owns land on the edge of Hermitage, as shown on the plans attached. On behalf of Hermitage Farms, we agree that the main purpose of the Local Plan Review should be to assess the future levels of need for new homes and employment land and other land uses to 2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.</p> <p><u>Housing Need</u></p> <p>Paragraph 47 of the NPPF requires Local Plans to meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area. The presumption in favour of sustainable development within the NPPF (paragraph 15) sets out that plans should be based on meeting the need identified in full, where it is sustainable to do so. The housing requirement should deal with economic growth forecasts, affordability and comply with its obligations under the duty to cooperate.</p>

Respondent	Response
	<p>Hermitage Farms consider that in order to meet the full extent of job growth forecast the Council should be aiming to achieve the upper end of the housing requirement identified in the West Berkshire Strategic Housing Market Assessment (SHMA).</p> <p>Furthermore, the housing target required should be a minimum requirement to support the aims and objectives of paragraph 47 of the NPPF to ‘significantly boost the supply of housing’.</p> <p>Where a Council is unable to meet all of its own identified housing need, it is required by legislation (the 2011 Localism Act) and Policy (NPPF paragraphs 178-182) to work with adjoining local authorities to consider where any shortfall can be met. West Berkshire may therefore be required to meet some of the housing need of neighbouring authorities.</p>
Fisher German for Mr Musgrave and Begley	Agree
Gladman Developments	<p>Gladman welcomes the Council’s intention to review the Local Plan for West Berkshire and notes the ambition for this to cover a wide range of issues.</p> <p>Gladman consider that it is essential that a comprehensive review of the West Berkshire Local Plan is undertaken. This is particularly important because the existing Core Strategy and Housing Site Allocations pursue a strategy that was prepared at a time when the housing requirement for the District was determined through regional planning. It is crucial that local authorities keep their local plans up-to-date<sup>6</sup> and that the objectively assessed development needs of the area are planned for in full.</p> <p>The timeframe for the new Local Plan’s preparation will necessitate the careful consideration of the Government’s emerging revisions to the National Planning Policy Framework. It is therefore highly likely that these forthcoming changes will further influence the scope and content of the new West Berkshire Local Plan.</p>
Hallam Land Management	<p>These representations have been prepared on behalf of Hallam Land Management Limited (HLM) and Wilson Enterprises Limited (WEL). HLM and WEL jointly control land south of Reading, in the vicinity of Grazeley. Previous representations to West Berkshire, Wokingham and Reading have highlighted the eminent suitability of this location for a new settlement. Whilst the land controlled by HLM and WEL falls predominantly in Wokingham Borough, the proposal itself spans the District boundaries and requires all three Authorities to be committed to working in partnership to produce a Comprehensive Masterplan and coordinated Infrastructure Delivery Plan. HLM and WEL remain committed to working alongside the three Authorities to achieve this objective.</p>
Richard Nevill for The Chilton Estate	<p><u>Housing Need</u></p> <p>It is most important in regard to the provision of housing that the Council should review the numbers carefully so it ensures that sufficient land is provided for the period to be covered by the Local Plan taking into account the Government’s statements on housing numbers and the requirement of a 5 year land supply in accordance with the provisions of the NPPF.</p>

Respondent	Response
	<p><u>Site Allocation Sizes</u></p> <p>There has been a Ministerial statement which specifies the treatment of small sites in relation to the provision of social housing and contributions. This is to encourage smaller sites to be brought forward for development. We consider it essential that support for smaller sites is included in the Local Plan in order to offer product diversity and to involve smaller builders and developers in the development process.</p>
Nexus Planning for Croudace	<p>The Scoping Report sets out the scope of the review at Chapter 3 but suggests that the purpose of the Local Plan Review will be to:</p> <p>“assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller Accommodation) and employment land and other land uses up to 2036 and to provide an appropriate basis for housing employment land and infrastructure provision over that period”.</p> <p>The West Berkshire District Local Plan was adopted in 2002 and was intended to cover the period 1991 - 2006. A number of policies were duly saved, but were intended to be in place only until 2012. The adopted Local Plan is therefore substantially out-of-date.</p> <p>The West Berkshire Core Strategy was adopted in July 2012, following a protracted examination in public. It covers the period 2006 – 2026. It allocates strategic sites and contains, at Policy CS1, a housing requirement of at least 10,500 new homes between the period 2006 and 2026, equivalent to some 525 dwellings per annum. This figure was derived from the housing requirement for the District contained within the now revoked South East Plan Regional Spatial Strategy.</p> <p>The National Planning Policy Framework (the Framework) sets out at paragraph 47 that it is a Government objective: ‘To boost significantly the supply of housing...’</p> <p>In doing so, local planning authorities (‘LPA’s’) are required to use their evidence base to meet the full, objectively assessed need (‘OAN’) for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in the Framework.</p> <p>It was acknowledged by the Council during the course of the examination that the proposed housing requirement did not represent the full objectively assessed need for housing as required by the Framework at Paragraph 47. Nonetheless, the Inspector recommended adoption of the Plan subject to main modifications which make it clear that:</p> <ol style="list-style-type: none"> <li>i. The 10,500 housing figure is expressed as a minimum and not a ceiling;</li> <li>ii. An early review of housing provision on the basis of a new SHMA, produced within three years in cooperation with the other authorities in the HMA (i.e by July 2015).</li> </ol> <p>The Council has since chosen to prepare and adopt the Housing Site Allocation DPD (HSA DPD). However, the HSA DPD has a limited scope in identifying sites to meet the remaining part of the ‘at least’ 10,500 housing requirement from the Core Strategy, as well as additional sites to meet the first part of its OAN. As a consequence, the Council does not have a Framework compliant housing target embedded within a Development Plan, and based on the latest version of the Council’s Local Development Scheme, it will be more than 8 years following adoption of the Core Strategy before it does so.</p> <p>Against that background, it is imperative that a comprehensive review of the Local Plan is carried out, to include a Framework compliant housing requirement and allocations to meet that need over the Plan period. We therefore broadly</p>

Respondent	Response
	<p>support the scope of the review as set out at Section 3 of the Scoping Report.</p> <p>The Council will however be aware that the Government recently consulted on potential changes to the NPPF including amendments in terms of plan making. This incorporates proposed changes to the tests of soundness, including amendments to the 'positively prepared' test to emphasise the role of Plans in meeting objectively assessed needs for housing.</p> <p>Paragraph 29 also states that in order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these. Paragraph 36 goes on to set out the soundness tests and proposes a strengthening of both the 'positively prepared' and 'effective' soundness tests in particular so that local plans are (a) informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated; and (b) based on effective joint working on cross-boundary strategic matters, as evidenced by a statement of common ground.</p> <p>The scope of the review should be amended to make it clear that the Council will have regard to the emerging changes to the NPPF where applicable.</p>
Nexus Planning for Pangbourne Beaver Properties	<p>These representations have been prepared by Nexus Planning in response to the West Berkshire Local Plan Review to 2036 Scoping Report. They are submitted on behalf of Pangbourne Beaver Properties Ltd (PBP Ltd) who own and manage land and properties in Pangbourne. PBP Ltd support local businesses and traders who operate from within the village and wish to see them continue to thrive and prosper. In order for the village to maintain its vitality it is important that an appropriate amount of new housing to be provided for the village.</p> <p>The Council will be aware that PBP Ltd have secured planning permission for and undertaken, or facilitated, a range of developments within the village. These are all well designed developments that have contributed to the vitality and attractiveness of the village. These have included:</p> <p>Formosa Place on Pangbourne Hill (4 detached houses with a prominent frontage) Fernbrook on Reading Road (refurbishment and conversion of five flats in listed building) Shepard Place on Reading Road (16 houses and flats, including affordable units)</p> <p>Redevelopment of Bridge Garage for Bentley dealership (refurbishment and redevelopment of garage)</p> <p>Land to the west of Pangbourne Hill (35 houses and flats including affordable units)</p> <p>Pangbourne is a large village with a population of around 3,000. It lies on the south bank of the River Thames and benefits from good transport linkages by road and rail up and down the Thames valley. The centre of Reading is 7 miles to the east. Pangbourne has an excellent range of shops including many independent traders that are encouraged by PBP Ltd. It also has a good range of community facilities including a primary School and a range of leisure facilities. Pangbourne railway station provides an excellent service to Oxford, Reading and central London. Pangbourne village is therefore a highly sustainable location that services the village itself and its hinterland.</p> <p>In order to maintain the vitality of the village PBP Ltd wish to ensure that the West Berkshire Plan to 2036 makes provision for additional housing land to be allocated on land that they own to the north of Pangbourne Hill. Their land will allow for development of an appropriate scale for the village.</p>

Respondent	Response
	<p>The Scoping Report sets out the scope of the review at Chapter 3 and indicates that the purpose of the Local Plan Review will be to:</p> <p>“assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller Accommodation) and employment land and other land uses up to 2036 and to provide an appropriate basis for housing employment land and infrastructure provision over that period”.</p> <p>The West Berkshire District Local Plan was adopted in 2002 and was intended to cover the period 1991-2006. A number of policies were duly saved, but were intended to be in place only until 2012. The adopted Local Plan is therefore substantially out-of-date.</p> <p>The West Berkshire Core Strategy was adopted in July 2012, following a protracted examination in public. It covers the period 2006 – 2026. It allocates strategic sites and contains, at Policy CS1, a housing requirement of <i>at least</i> 10,500 new homes between the period 2006 and 2026, equivalent to some 525 dwellings per annum. This figure was derived from the housing requirement for the District contained within the now revoked South East Plan Regional Spatial Strategy. The National Planning Policy Framework (the Framework) sets out at paragraph 47 that it is a Government objective: ‘To boost significantly the supply of housing...’</p> <p>In doing so, local planning authorities (‘LPA’s) are required to use their evidence base to meet the full, objectively assessed need (‘OAN’) for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in the Framework.</p> <p>It was acknowledged by the Council during the course of the examination that the proposed housing requirement did not represent the full objectively assessed need for housing as required by the Framework at Paragraph 47. Nonetheless, the Inspector recommended adoption of the Plan subject to modifications which make it clear that:</p> <p>The 10,500 housing figure is expressed as a minimum and not a ceiling;</p> <ul style="list-style-type: none"> <li>• An early review of housing provision on the basis of a new SHMA, produced within three years in cooperation with the other authorities in the HMA (i.e by July 2015).</li> </ul> <p>The Council has prepared and adopted the Housing Site Allocation DPD (HSA DPD). However, the HSA DPD has a limited scope in identifying sites to meet the remaining part of the ‘at least’ 10,500 housing requirement from the Core Strategy, as well as additional sites to meet the first part of its OAN. As a consequence, the Council does not have a Framework compliant housing target embedded within a Development Plan, and based on the latest version of the Council’s Local Development Scheme, it will be more than 8 years following adoption of the Core Strategy before it does so.</p> <p>The Council is therefore urged to rapidly press ahead with the preparation of a new Local plan that makes appropriate housing allocations; and which takes account of the other representations in this document.</p>
Origin3 for Sandtrend	<p>These representations to the West Berkshire Local Plan Review Consultation (March 2018) have been prepared by Origin3 on behalf of Sandtrend Ltd in relation to their site at Land West of Wantage Road, Shaw-cum-Donnington, Newbury. A Site Location Plan is attached. These representations focus on the soundness of the Local Plan Review</p>

Respondent	Response
	<p>(LPR) spatial strategy and objectively assessed housing need (OAHN). The key themes running through these representations are as follows:</p> <ul style="list-style-type: none"> <li>• The OAHN should be revised upwards to take account of the latest SHMA (2016) and to account for Reading Borough’s unmet need;</li> <li>• A clear strategy to deliver OAHN should be set out through the LPR;</li> <li>• The LPR should test and explore the strategic and non-strategic growth opportunities within the West of Berkshire Spatial Framework Plan, including growth opportunities north of Newbury;</li> <li>• The Council’s delivery strategy should comprise a robust mix of sites for delivery within the short, medium and longer term;</li> </ul> <p>Sandtrend’s site at Land West of Wantage Road, Shaw-cum-Donnington, Newbury should be allocated to deliver up to 200 new homes to ensure market and affordable housing delivery in the shorter term.</p> <p>The tests of soundness for local plans and policies are set out in NPPF paragraph 182.</p> <p>West Berkshire Council will also need to consider emerging national policy which is expected to be in place later this year. Namely updates to the NPPF which are currently being consulted on (March 2018).</p> <p>Due to the short timeframe remaining on the current plan period (up to 2026) and acknowledging that the Core Strategy was adopted in 2012, a fully comprehensive review of existing development plan policies is now required as a minimum. This is particularly important in light of recent updates to national policy (Town and Country Planning Regulations 2017 (Regulation 10A) which stipulate a Local Plan Review (LPR) must be <u>completed</u> every five years, starting from the date of adoption.</p> <p>At West Berkshire, the need to review the OAHN is particularly pertinent as the existing housing requirement and spatial strategy underpinning the Core Strategy (2012) is based on the now revoked pre-NPPF South East Plan. The existing OAHN is therefore based on evidence pre-NPPF and as such does not account for the significant boost in new homes required by the Government or emerging updates to national policy.</p> <p>Through this LPR process West Berkshire will therefore need to establish the OAHN for the new plan period based on up to date evidence in the Berkshire Strategic Housing Market Assessment (SHMA) and taking into account updates to national policy and the introduction of a Standardised OAHN Methodology. The OAHN will also need to account for unmet need at Reading Borough following a Memorandum of Understanding between the Council’s. This is covered in greater detail in Section 3 of these representations.</p> <p>The principle of a comprehensive LPR is supported. We do however request that the Council provide greater clarity as to the extent of the Review in dealing with a strategy for housing delivery in the short to medium term. It is not understood whether the Scope of this LPR is to identify non-strategic sites as well as strategic sites. In order to be considered positively prepared in the context of the NPPF paragraph 182 the Council should provide a clear strategy to meet OAHN. The NPPF paragraph 47 requires local planning authorities to:</p> <p><i>“identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing with an additional buffer of 5%... and... identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.”</i></p>

Respondent	Response
	<p>This LPR should therefore include a housing trajectory identifying a range of suitable strategic and non-strategic sites for housing delivery across the whole of the plan period. This should account for the cumulated under delivery to date and the uplift in OAHN in the short term. These points are covered in more detail in Section 3.</p> <p>Through the LPR housing trajectory and delivery strategy, the Council will also need account for a sufficient buffer to boost housing supply and ensure that there is a robust strategy in place to deal with any potential delays to the plan being adopted.</p> <p>The Council's Local Development Scheme anticipates adoption in November 2020 meaning the plan period will have only fifteen years to run (up to 2036). Any unforeseen delays to adoption would risk the LPR not being considered positively prepared in the context of the NPPF, as emerging updates to the NPPF require <i>“strategic policies to look ahead to a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”</i>.</p> <p>We therefore support the Council's intentions to undertake a comprehensive Review of the Local Plan however urge the Council to ensure there is a sufficiently robust housing delivery strategy in place to account for any unforeseen setbacks to the timescales for adoption.</p>
Pegasus Planning Group for Donnington New Homes	<p><i>Response relates to land adjacent to Land at Smitham Bridge Road, Hungerford</i></p> <p>Yes – the proposed scope of the review is wide ranging, and covers all relevant areas. It will ensure that the Local Plan to 2036 is consistent with national policy, especially now that the Draft Revised NPPF has been released for consultation. It will also allow the alteration and addition of polices where it is considered necessary.</p>
Pegasus Planning Group for Donnington New Homes	<p><i>relates to land adjacent to Long Lane, Newbury</i></p> <p>Yes – the proposed scope of the review is wide ranging, and covers all relevant areas. It will ensure that the Local Plan to 2036 is consistent with national policy, especially now that the Draft Revised NPPF has been released for consultation. It will also allow the alteration and addition of polices where it is considered necessary.</p>
Pegasus Planning Group for Wasing Park Estate	<p>Paragraph 3.2 confirms that the scope of the review will involve a review of the adopted DPD policies to ensure consistency with national policy, and the introduction of new policies in response to recent changes in national planning policy and guidance. The Local Plan Review will need to align with and take account of the Draft Revised National Planning Policy Framework (NPPF) which is currently out for consultation.</p>
Pro Vision for Rivar	<p>The Scope and Content of the Local Plan Review will need to be comprehensively reviewed (and therefore subjected to further consultation) in the light of the revisions to the NPPF and PPG. In particular, consideration will need to be given to matters such as:</p> <ul style="list-style-type: none"> <li>• The determination of housing need. This will need to be based on the Standardised Methodology. The Plan should however recognise that this establishes the minimum number of houses needed. n circumstances where the standardised methodology produces an annualised need which is lower than past levels of housing provision (as may be the case), and mindful of the Government's objective of significantly boosting the supply of housing, consideration should</li> </ul>



Respondent	Response
	<p>be given to adopting a higher figure, having regard to, inter alia, market signals.</p> <ul style="list-style-type: none"> <li>• Viability Assessment. The Plan will need to be informed by an assessment of viability to ensure that the burden of developer contributions and affordable housing is not of a scale that will make development unviable.</li> <li>• There will need to be a clear distinction between Strategic and Local Policies. To achieve this, consideration should be given to preparing two separate Plans, albeit in parallel and co-terminus.</li> <li>• Small Sites. The draft NPPF requires that at least 20% of sites identified for housing in the Plan should be small sites of less than 0.5ha, to assist with early delivery, achieving a good mix of sites and supporting small and medium housebuilders (such as Rivar).</li> <li>• Rural housing. The Plan will need to identify opportunities for villages to grow and thrive.</li> </ul> <p>Rivar are concerned that a new settlement south of Junction 11 of the M4 would undermine the delivery of the well-established spatial strategy of distributing growth to support the existing settlement hierarchy. That strategy remains the most appropriate. The new settlement option appears to be being justified on the grounds that it would accommodate a substantial proportion of the housing need of neighbouring authorities (albeit within the same broadly defined Housing Market Area). In our view such an approach is contrary to the draft NPPF which makes it clear that cross border strategic matters should deal with housing requirements and distribution that cannot be met in neighbouring areas. There is no evidence that the scale of development contemplated south of Junction 11 cannot be accommodated elsewhere within West Berkshire and the neighbouring local authority areas.</p> <p>Plan period. The Plan is not programmed to be adopted before the end of 2020. It is, based on past performance, very likely to be later. 15 years is the minimum period a LPA should plan for. Therefore, consideration should be given to adopting a plan end date of 2041.</p>
Pro Vision for Audley Group	Audley Group supports the review of the Local Plan and comments under other questions about the scope of the review.
Pro Vision for Rootes Trustees	<p>The Scope and Content of the Local Plan Review will need to be comprehensively reviewed (and therefore subjected to further consultation) in the light of the revisions to the NPPF and PPG. In particular, consideration will need to be given to matters such as:</p> <ul style="list-style-type: none"> <li>• The determination of housing need. This will need to be based on the Standardised Methodology. The Plan should however recognise that this establishes the minimum number of houses needed. In circumstances where the standardised methodology produces an annualised need which is lower than past levels of housing provision (as may be the case), and mindful of the Government's objective of significantly boosting the supply of housing, consideration should be given to adopting a higher figure, having regard to, inter alia, market signals.</li> <li>• Viability Assessment. The Plan will need to be informed by an assessment of viability to ensure that the burden of developer contributions and affordable housing is not of a scale that will make development unviable.</li> <li>• There will need to be a clear distinction between Strategic and Local Policies. To achieve this, consideration should be given to preparing two separate Plans, albeit in parallel and co-terminus.</li> <li>• Small Sites. The draft NPPF requires that at least 20% of sites identified for housing in the Plan should be small sites of</li> </ul>

Respondent	Response
	<p>less than O.Sha, to assist with early delivery, achieving a good mix of sites and supporting small and medium developers.</p> <ul style="list-style-type: none"> <li>• Rural housing. The Plan will need to identify opportunities for villages to grow and thrive.</li> </ul> <p>The Rootes Trustees are concerned that a new settlement south of Junction 11 of the M4 would undermine the delivery of the well-established spatial strategy of distributing growth to support the existing settlement hierarchy. That strategy remains the most appropriate. The new settlement option appears to be being justified on the grounds that it would accommodate a substantial proportion of the housing need of neighbouring authorities (albeit within the same broadly defined Housing Market Area). In our view such an approach is contrary to the draft NPPF which makes it clear that cross border strategic matters should deal with housing requirements and distribution that cannot be met in neighbouring areas. There is no evidence that the scale of development be contemplated south of Junction 11 cannot be accommodated elsewhere within West Berkshire and the neighbouring local authority areas.</p> <p>Plan period. The Plan is not programmed to be adopted before the end of 2020. It is, based on past performance, very likely to be later. 15 years is the minimum period a LPA should plan for. Therefore, consideration should be given to adopting a plan end date of 2041.</p>
Pro Vision for Greenham Trust	<p>These representations are made by Pro Vision on behalf of the Greenham Trust Ltd (the Trust). The Trust owns Greenham Business Park as well as other property within West Berkshire and the neighbouring districts. It is a charitable organisation, with profits being used to support good causes throughout the region. It is, therefore, a key local stakeholder and will be keen to engage with further stages of the review process.</p> <p>The Trust generally supports the scope of the Local Plan Review and makes more specific comments in response to the proceeding consultation questions.</p>
Provision for Cala Group and Wates Developments	<p>The Scope and Content of the Local Plan Review will need to be comprehensively reviewed (and therefore subjected to further consultation) in the light of the revisions to the NPPF and PPG. In particular, consideration will need to be given to matters such as:</p> <ul style="list-style-type: none"> <li>• The determination of housing need. This will need to be based on the Standardised Methodology. The Plan should however recognise that this establishes the minimum number of houses needed. In circumstances where the standardised methodology produces an annualised need which is lower than past levels of housing provision (as may be the case), and mindful of the Government's objective of significantly boosting the supply of housing, consideration should be given to adopting a higher figure, having regard to, inter alia, market signals.</li> <li>• Viability Assessment. The Plan will need to be informed by an assessment of viability to ensure that the burden of developer contributions and affordable housing is not of a scale that will make development unviable.</li> <li>• There will need to be a clear distinction between Strategic and Local Policies. To achieve this, consideration should be given to preparing two separate Plans, albeit in parallel and co-terminus.</li> <li>• Small Sites. The draft NPPF requires that at least 20% of sites identified for housing in the Plan should be small sites of less than O.Sha, to assist with early delivery, achieving a good mix of sites and supporting small and medium developers.</li> <li>• Rural housing. The Plan will need to identify opportunities for villages to grow and thrive.</li> </ul>

Respondent	Response
	<p>CALA Homes and Wates Developments are concerned that a new settlement south of Junction 11 of the M4 would undermine the delivery of the well-established spatial strategy of distributing growth to support the existing settlement hierarchy. That strategy remains the most appropriate. The new settlement option appears to be being justified on the grounds that it would accommodate a substantial proportion of the housing need of neighbouring authorities (albeit within the same broadly defined Housing Market Area). In our view such an approach is contrary to the draft NPPF which makes it clear that cross border strategic matters should deal with housing requirements and distribution that cannot be met in neighbouring areas. There is no evidence that the scale of development be contemplated south of Junction 11 cannot be accommodated elsewhere within West Berkshire and the neighbouring local authority areas.</p> <p>Plan period. The Plan is not programmed to be adopted before the end of 2020. It is, based on past performance, very likely to be later. 15 years is the minimum period a LPA should plan for. Therefore, consideration should be given to adopting a plan end date of 2041.</p>
Tetlow King Planning for Rentplus UK	<p>We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model. The Rentplus model addresses the primary barrier to home ownership – the lack of a mortgage deposit – through a combination of a secure rented period at an affordable rent (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. In this way it extends the opportunity of home ownership to families who are otherwise unable to afford it and to do so within a timeframe to suit their circumstances.</p> <p>We agree with the proposed scope of the Review.</p>
Thakeham Homes	<p>Thakeham are a housebuilder based in Sussex, with a proven track record of delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire.</p> <p>We wish to make representations based on the duty of West Berkshire to cooperate with neighbouring authorities to meet the housing need within the HMA. The draft plan fails to demonstrate how it will meet the Objectively Assessed Need (OAN) within the HMA and the Government standardised methodology figure and we consider that the plan cannot be considered sound until such times as this duty has been satisfactorily discharged.</p> <p>Duty to Cooperate</p> <p>The National Planning Policy Framework (NPPF) duty to cooperate requires that Local Planning Authorities (LPAs) demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full OAN for the area:</p> <p>“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.” NPPF 2012, Paragraph 181</p>

Respondent	Response
	<p>The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development” NPPF 2012, Paragraph 182</p> <p>We support the Council in its efforts to collaborate with other authorities in the Western Berkshire Housing Market Area (Bracknell Forest Borough Council, Reading Borough Council and Wokingham Borough Council).</p> <p>We note that the Council in conjunction with the authorities mentioned above have produced the West of Berkshire Spatial Planning Framework (December, 2016). The report notes that Berkshire Strategic Housing Market Assessment identifies that between 2013 and 2016 the area needs to deliver in the region of 65,665 new dwellings to deal with population growth, affordability, market factors, sustaining and improving economic growth and the impact of the continued growth of London. This means finding land for just under 3,000 homes per year’.</p> <p>Although the Spatial Planning Framework has acknowledged there are cross border issues there is no clear strategy on how to overcome the issues. Therefore, as the Local Plan progresses we would expect to see further cooperation and positive engagement between the Council and neighbouring authorities to ensure that a clear and transparent housing strategy, supported by a robust evidence base has been agreed between parties, detailing how the identified OAN for the HMA will be met and how any unmet need across the HMA will be addressed in full. This is encouraged further by the proposed introduction of the requirement in the NPPF for local planning authorities within a housing market area to produce a Statement of Common Ground as set out in the Government’s recent consultation document.</p> <p>The current Spatial Strategy outlined in Policy CS1 in the Core Strategy provides a housing figure of at least 10,500 net additional dwellings and associated infrastructure over the period 2006 – 2026 (525 dpa). However, the Berkshire SHMA (2016) provides an OAN figure of 665 dpa between 2013 and 2036 which is in line with the Government’s Standardised methodology figure. Although this figure cannot be applied retrospectively, it does mean that the Local Plan Review will need to be based on the standardised methodology, which has been brought into the draft revised NPPF (March 2018) as a statement of intent for its introduction in Spring 2018. Therefore, as the plan progresses we would expect to see a higher OAN for the District which would be in line with the Government’s objective.</p> <p>It is essential that the emerging Local Plan acknowledges the Government’s ambitions to significantly boost the supply of housing and seek to deliver the full housing requirement of the district to comply with national policy, particularly paragraph 47 of the NPPF.</p> <p>We fully support the steps that the Council has already taken to engage in initial discussions with neighbouring authorities. As the plan progresses we would expect to see further co-operation between the authorities in relation to housing on an on-going basis in order to ensure that the duty to cooperate has been sufficiently discharged.</p>
Turley for Commercial Estates Group	It is considered that this high-level scope is broadly appropriate and we would stress the necessity for the Local Plan Review to be comprehensive and supported by extensive new evidence.
Turley for Berfeld	We do not agree with paragraph 3.3. The scope of the Local Plan Review is broad and wide-ranging. The Council’s current Development Plan is based on the Core Strategy that was prepared prior to the introduction of the National Planning Policy Framework in March 2012. It is therefore appropriate to give this Local Plan review the broadest possible

Respondent	Response
	<p>basis for reviewing existing policies to ensure that they are in accordance with current and emerging national policy and guidance, and other evidence based documents that should rightfully inform the Local Plan.</p> <p>With this in mind, it may well be necessary to change or remove policies however they currently accord with national policy as national policy is currently undergoing significant change. The Council should not restrict itself unnecessarily at this stage of their Local Plan review.</p>
Turley for A2dominion Housing Group	<p>We are writing on behalf of A2 Dominion, who has land interests within Streatley in West Berkshire. These representations seek to respond to the Local Plan Review Scoping Report and Sustainability Appraisal Scoping Report consultation to assist in the evolution of the new Local Plan. In particular these representations address the role of Streatley in the settlement hierarchy.</p> <p>Streatley is not specifically identified within the settlement hierarchy for the District (albeit benefits from a settlement boundary) as defined by Policy ADPP1 of the Core Strategy despite the evident opportunities for the delivery of sustainable development discussed below. We consider that the role of Streatley should be explored further in order to understand the opportunities that it provides to contribute towards meeting the projected housing needs to 2036.</p> <p>The adopted Development Plan was based upon the adopted/ emerging planning context at the time of its preparation and the associated evidence base to support the spatial strategy. As the emerging Local Plan progresses, some of the evidence base which underpinned the Core Strategy and Housing Site Allocations DPD will be at least 10 years old and cannot be considered transferable to considering the spatial strategy to 2036. The evidence base needs to be re-visited to ensure that the new Local Plan is positively prepared and based on the most appropriate strategy (paragraph 182 of the Framework). This is particularly relevant given the Inspector's Report to the Core Strategy acknowledges that at the time of adoption the Plan was not meeting the full OAN for the District and that an early review would be required. This reinforces the need for WBC to update the evidence base to inform the spatial objectives between 2026 -2036 and consider both its own housing needs and those of the wider Housing Market Area to which the District has strong functional relationships through the Duty-to-Cooperate.</p> <p>It is considered necessary to review all policies contained within the adopted Development Plan to ensure both consistency with national policy and that they will remain applicable to shaping and guiding development to 2036 in accordance with paragraph 154 of the Framework.</p> <ul style="list-style-type: none"> <li>• The introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Core Strategy or the Housing Site Allocations DPD</li> </ul> <p>Given a number of the Local Plan policies (2001-2006) have been saved since 2006 and form part of the adopted Development Plan, these policies need to be reviewed as part of the new Local Plan given they were only originally intended for the period to 2006. All these saved policies should be replaced as part of the new Local Plan.</p> <ul style="list-style-type: none"> <li>• The introduction of new policies in response to recent changes in national planning policy and guidance</li> </ul> <p>WBC need to ensure that any implications on the plan making process and the preparation of associated policies arising from the changes to national planning policy and guidance are fully considered at the appropriate time.</p>

Respondent	Response
Turley for North East Thatcham Consortium	<p>The North East Thatcham Consortium comprises A2Dominion; Donnington New Homes, Ptarmigan and Gully Farm and these representations are made jointly and severally on behalf of the Consortium members.</p> <p>The Consortium generally agrees with the Council’s proposed scope of the Local Plan Review for the following reasons and subject to the following comments.</p> <ul style="list-style-type: none"> <li>• <i>A review of the existing Core Strategy strategic objectives</i></li> </ul> <p>The Core Strategy was adopted in 2012 based upon the existing and emerging planning policy context at the time. Furthermore, in a number of cases, the evidence upon which Core Strategy was based was prepared some time before its adoption. By the time the Local Plan Review progresses, parts of the evidence base which underpinned the Core Strategy will be at least 10 years old. Furthermore, by the time the Local Plan Review progresses, the national planning policy context will have shifted. The Core Strategy was adopted shortly after the publication of the National Planning Policy Framework in 2012, whereas the revised National Planning Policy Framework (currently published for consultation in draft) is expected to be in place later in 2018.</p> <p>With regards to the planned provision for housing it is evident from the Core Strategy Inspector’s Report that the Core Strategy did not meet the full objectively assessed need in West Berkshire (para 41. The Inspector also anticipated the need for an early review of housing provision on the basis of updated evidence of housing need which accounted for needs in full across the Housing Market Area (HMA) within which West Berkshire is located.</p> <p>It is therefore fundamental that the strategic objectives contained in the Core Strategy (paragraph 3.8) are reviewed in order to ensure that the objectives of the Local Plan Review are able to respond to updated evidence and shifts in national planning policy.</p> <p>It is also essential that the Core Strategy strategic objectives are reviewed as they relate to the Core Strategy plan period (2006 – 2026). In contrast the Local Plan Review will need to plan for at least 15 years from its adoption and at present is proposed to cover the period to 2036. On that basis, the strategic objectives set out in the Local Plan Review will need to be capable of responding to updated evidence regarding the period to 2026 as well as the period between 2026 and 2036. This will be particularly relevant to the Core Strategy objective on Housing Growth (strategic objective 2) which relates to the delivery of “at least 10,500 homes across West Berkshire between 2006 – 2026.” It is of note that the latest published Strategic Housing Market Assessment (SHMA) for West Berkshire identifies a need for 665 new dwellings a year on average for the period 2013 to 2036. This equates to a total need for in excess of 15,000 dwellings and represents a level of need which notably exceeds that currently provided for within the Core Strategy. The SHMA identifies a considerably greater need across the Western Berkshire HMA (the administrative areas of West Berkshire, Reading, Wokingham and Bracknell Forest), with some 2,855 homes per annum identified as being needed over the same period (over 65,000 homes in total).</p> <p>The Local Plan Review must take full account of the significant scale of identified housing need in the authority and across the area with which it shares strong housing market relationships.</p> <ul style="list-style-type: none"> <li>• <i>A review of the existing spatial strategy for the District</i></li> </ul>

Respondent	Response
	<p>The Consortium considers that it is reasonable for the preparation of the Local Plan Review to include a review of the existing spatial strategy for the District (section 4 of the Core Strategy) to ensure that this reflects the most recent evidence and national planning policy.</p> <ul style="list-style-type: none"> <li><i>A review of all the existing Core Strategy and Housing Site Allocations DPD policies to ensure their continued consistency with national policy</i></li> </ul> <p>The Consortium considers that it is reasonable to review of all the existing Core Strategy and Housing Site Allocations DPD policies to ensure their continued consistency with national policy as part of the Local Plan Review. The Consortium considers that it is essential that this review is undertaken in relation to the policies and appendices of the Local Plan 1991 – 2006 (adopted 2004) which the Council continues to apply for the reasons explained below.</p> <ul style="list-style-type: none"> <li><i>The introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Core Strategy or the Housing Site Allocations DPD</i></li> </ul> <p>The Council's website (<a href="http://info.westberks.gov.uk/article/28783">http://info.westberks.gov.uk/article/28783</a>) suggests that 23 policies and 5 appendices of the Local Plan 1991 – 2006 continue to be applied. Those policies were only intended to be used in relation to the period to 2006 and the Consortium considers that much will have changed (both in circumstance and evidence) since those policies were prepared.</p> <p>The Consortium therefore considers that it is essential that the preparation of the Local Plan Review includes an assessment of all of the parts of the Local Plan 1991 – 2006 which the Council continues to apply. This assessment should consider the extent to which the policies or appendices are necessary, justified by evidence and fit for purpose in a plan period which extends to 2036.</p> <p>Furthermore, the Consortium considers that the Local Plan Review should be used as an opportunity to replace any remaining parts of the Local Plan 1991 – 2006 which the Council continues to apply. Should that not occur then this could lead to a situation where development being determined in 2036 is to have regard to policies adopted more than 30 years ago in 2004. This is not considered to represent an effective strategy.</p> <p>The Local Plan Review should replace all of the retained policies of the Local Plan 1991 – 2006 in order to provide an up to date, transparent, effective and easily accessible planning policy context in West Berkshire.</p> <ul style="list-style-type: none"> <li><i>The introduction of new policies in response to recent changes in national planning policy and guidance</i></li> </ul> <p>The Consortium considers that it is reasonable for the Local Plan Review to be prepared on the basis that new policies may be included in response to changes in national planning policy and guidance.</p>
Joy Schlaudraff	<p>Yes, definitely.</p> <p>The planning system, though there for control, which is good, is too bureaucratic and needs to be simpler, for simple applications, to make them as easy as possible for both council and applicant.</p> <p>There should be some system, which identifies ANY and ALL land which can, or could, be built on, at some time, so that there is less uncertainty and money-making in the whole thing.</p>

Respondent	Response
	<p>The system needs to be enabled, so that people wanting to develop their land can be given simple free information, as to where on their land the council would be happy to consider housing or other development. The information should be volunteered from the council, not the other way about.</p> <p>This would end all the unnecessary waiting and expense, and enable development in general, albeit under the control of the council. Which is right.</p>
West Waddy for Gerald Palmer Eling Trust	<p>Yes. Paragraph 3.1 states that <i>'the review will be wide ranging.'</i> This is supported. In particular, it is important that the review includes the settlement boundaries which have not been reviewed since they were defined on the West Berkshire Local Plan 1991- 2006 Proposals Map. These boundaries are therefore seriously out of date and need reviewing to enable sufficient development to take place in rural areas to satisfy local housing need. The settlement boundary review is also required to make the new Local Plan consistent with the National Planning Policy Framework (NPPF) which emphasises the importance of maintaining the vitality of rural communities, (NPPF para 17 &amp; 55). Indeed, this is further emphasised in the proposed revisions to the NPPF, issued for consultation in March 2018, which state that <i>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services,'</i> (NPPF Proposed revisions para 80). To enable this to happen it is essential that the settlement boundaries of rural communities are reviewed.</p> <p>There is also a long standing Council commitment to review settlement boundaries. Paragraph 2.42 of the Core Strategy adopted in July 2012, stated that: <i>'The Core Strategy will be followed by a Site Allocations Development Plan Document. This will include details of any additional housing allocations, reviews of settlement and town centre boundaries, plus policies for development management.'</i> The subsequent Site Allocations DPD also contained a commitment that: <i>'all settlement boundaries, including those below the settlement hierarchy, will be reviewed through the new Local Plan,'</i> (para 1.35).</p> <p>There is, therefore, now a pressing need for settlement boundaries to be reviewed in order to bring them up to date; to enable sufficient housing to be provided in rural areas; to accord with Government policy and to comply with the Council's previous commitments.</p>
Woolf Bond Planning for Donnington New Homes	<p>National Planning Policy Framework (NPPF) and the Tests of Soundness</p> <p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a Development Plan Document ('DPD') should be <u>positively prepared</u>, <u>justified</u>, <u>effective</u> and <u>consistent with national policy</u>.</p> <p>In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>For the reasons set out in this paper there are a number of potential matters that we recommend are addressed in future iterations of the emerging Plan.</p>



Respondent	Response
	<p>We agree with the proposed scope of the Local Plan review. It acknowledges the need to review the Council's housing requirement and spatial strategy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.</p>
<p>Woolf Bond Planning for Donnington New Homes</p>	<p>Our client's interests relate to land located at Copyhold Farm, Kiln Drive, Curridge. The site extends to a total 4.16ha and is suitable for housing development comprising up to approximately 125 no. dwellings in a location adjoining the settlement of Curridge. The site is of a size such that it could also be supported by community uses such as public open space, a children's play area or allotments. The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period. A Site Location Plan is submitted in support of these representations, alongside the requisite form.</p> <p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a Development Plan Document ('DPD') should be <u>positively prepared, justified, effective and consistent with national policy</u>.</p> <p>In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>For the reasons set out in this paper there are a number of potential matters that we recommend are addressed in future iterations of the emerging Plan.</p> <p>We agree with the proposed scope of the Local Plan review. It acknowledges the need to review the Council's housing requirement and spatial strategy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.</p>
<p>Woolf Bond Planning for JJP Land</p>	<p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>For the reasons set out in this paper there are a number of potential matters that need to be addressed in future iterations of the emerging Plan.</p>

## Summary of responses

The majority of respondents agreed with the proposed scope of the Review and were clear in the need for it to be comprehensive and based on an up to date evidence base. They were also in agreement of the need to review the Council's housing requirement and spatial strategy, settlement hierarchy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.

There was a concern from a few respondents that the Scoping Report lacked sufficient evidence and context and that a further body of work should therefore be produced to enable more meaningful and constructive responses from stakeholders. The need for the Council to re-examine its approach once the revised NPPF and NPG were published was also stressed.

A number of respondents raised issues regarding the overall housing requirement for the Local Plan Review. Some planning agents noted that the current plan was not reflective of the most up to date evidence on housing need and felt a national policy compliant housing requirement is long overdue. The requirement to engage with other authorities both within and beyond the HMA was considered to have implications on future housing need. The need for a clear strategy to meet this need, with sufficient buffer to boost housing supply and ensure that there is a robust strategy to deal with any potential delays to the plan being adopted was expressed.

With regard to the standard methodology the comment was made that consideration should be given to adopting a higher figure, mindful of the government's objective of significantly boosting the supply of housing.

One respondent from the development industry requested the Council provide greater clarity as to the extent of the Review in dealing with a strategy for housing delivery in the short to medium term. They were not clear whether the scope of the Review was to identify non-strategic sites as well as strategic sites. Another respondent also emphasised the need for there to be a clear distinction between strategic and local policies and that in order to achieve this, consideration should be given to preparing two separate plans, albeit in parallel and co-terminus.

The issue of rural housing was raised, with respondents emphasising the need to identify opportunities for villages to grow and thrive.

One planning agent was making the case that a new settlement option would be contrary to the draft NPPF as cross border strategic matters should deal with the requirements and distribution that cannot be met in neighbouring areas, and there was no evidence that the scale of development contemplated south of Junction 11 could not be accommodated elsewhere within West Berkshire and the neighbouring local authority areas. The concern was that such an approach would undermine the delivery of the established spatial strategy of distributing growth to support the existing settlement hierarchy.

Support for a mix of sites to assist delivery in the short, medium and long term was expressed with smaller sites supported to offer product diversity and to involve smaller builders and developers.

The requirement for a minimum 15 year period from adoption was raised as an issue with regard to the end date of the Local Plan Review. As the Review is not anticipated to be adopted before the end of 2020 it was felt that consideration should be should be given to adopting a plan with an end date of 2041 rather than 2036.

Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies such as the needs of the racehorse and equestrian industry. Some statutory consultees also drew attention to various

requirements and other guidance that will need to be considered as the Review progresses. One parish council expressed its disappointment that there was no real emphasis on likely changes to the way that people live their lives and their changing aspirations such as the impact that electric and possibly autonomous vehicles may have.

## **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). Detailed comments made will be taken forward in the development of the spatial strategy and both strategic and local policies as appropriate.

It is encouraging to see that there is general agreement with the proposed scope of the Review. The importance of an adequate, up to date and relevant evidence base is acknowledged as is the need to undertake the LPR in close cooperation with our neighbouring authorities.

The Council will need to prepare the Review to conform to the revised national policy in the NPPF published on 24th July 2018.

The draft Strategic Objectives included in the Scoping Report have been reviewed in light of the responses received and changes will be made where appropriate. It is agreed that the inclusion of an overall Vision would help set the context for the Review.

The objective on housing is to ensure that the assessed need for market and affordable housing up to 2036 will be met. Housing need will be assessed using the government's standard method contained in the revised NPPF and PPG. This assessment will use the most up to date household projections as a starting point and the resultant need figure is considered to represent the minimum requirement to be included within the Local Plan Review to 2036. This figure will supersede the OAN in the 2016 Berkshire SHMA. The LPR will set out the strategy to meet this revised requirement. It will consider both strategic and non-strategic growth opportunities to meet the need over the plan period, including housing in rural areas of the District. The HELAA will provide evidence of growth opportunities in the area and will identify sites that have potential for development to inform the spatial strategy. Most of the sites that will be included were submitted through the Call for Sites (December 2016 to March 2017), through which agents and the public were invited to submit sites that they considered developable.

The LPR will contain a housing trajectory as required by national policy, although a trajectory can only represent a point in time and will be subject to review through the Annual Monitoring Report.

The Housing Site Allocations DPD reviewed the settlement boundaries of settlements within the settlement hierarchy. It is intended that all settlement boundaries are reviewed as part of the Local Plan Review. This will also include a review of the settlement boundary criteria.

## Responses received to the Local Plan Review Scoping Report (February 2018)

**Q2: Do you agree with the draft strategic objectives we have identified in Appendix 1? If not please tell us why and give reasons for your answer.**

Number of responses received: 56

Respondent	Response
Internal	
Archaeology Team West Berkshire Council	<p>We feel that Objective 6 Culture and 7 Heritage lack clarity – they seem to overlap but it’s not clear what Culture is or what heritage is. Suggested wording as regards the archaeology service’s mission statement - <i>Protecting, preserving and promoting West Berkshire’s historic environment resource for the benefit of those who live, work and visit here.</i></p> <p>Culture Manager ... suggests these draft objectives:</p> <p><b>6. Culture</b>            To promote culture (the arts in all forms and including library services) as fundamental to improved well-being and a thriving and sustainable local economy (including the visitor economy).</p> <p><b>7. Heritage</b>            To promote the understanding, preservation and presentation of West Berkshire’s historic landscape and archaeological resource for people who live in, work in and visit West Berkshire.</p>
Public Transport Team West Berkshire Council	<p>I broadly agree with the Draft Strategic Objectives identified in Appendix 1, although in respect of:</p> <p>Objective 4 Economy, I would request this be amended to read:</p> <p>“To facilitate and support a strong, diverse and sustainable economic base across the District, including through the designation of land in accessible locations for employment purposes to allow provision of suitable workplaces and in turn fostering a range of local job opportunities.”</p> <p>Objective 5, I would request this be amended to read:</p>

Respondent	Response
	<p>“To enhance the accessibility, vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities, coupled with employment commensurate with the size and nature of the established settlement.”</p>
Minerals and Waste Team West Berkshire Council	<p>1. <i>Climate Change</i> Climate change appears to have been narrowly interpreted to include only policy relating to flooding. However, it may be more appropriate to consider a wider interpretation of climate change in policy, including such as in policy CS15 (i.e. greenhouse gas emissions), and as has been done in the Minerals and Waste Local Plan (Policy 25 – Climate Change).</p> <p>3. <i>Sustainable and Quality Development</i> The minerals and waste team supports the intent to clarify linkages with these policies and the Minerals and Waste Local Plan going forward (it is suggested the most applicable policy in the Minerals and Waste Local Plan with which to make linkages is Policy 26 – Public Health, Environment and Amenity). It is important that both plans are consistent in their approach to policy issues for the application of policy in decision making.</p> <p>4. <i>Environment</i> Draft policy 8 in the Minerals and Waste Local Plan Preferred Options would, in part, seek to safeguard potential, planned and existing minerals associated infrastructure, including rail sites from non-mineral development. Other types of development which require a rail to road link would not be safeguarded under this draft policy. Therefore, as is indicated in the Scoping Report, further consideration would be required as to whether safeguarding of the non-minerals infrastructure is required and how this would be achieved in policy terms.</p> <p>7. <i>Heritage</i> and 9. <i>Transport</i> It is suggested that the Local Plan should also consider clarifying linkages with these policies and the corresponding policies in the Minerals and Waste Local Plan (Biodiversity and Geodiversity, Landscape, Protected Landscapes, Historic Environment and Transport and Flooding) going forward. It is important that both plans are consistent in their approach to policy issues for the application of policy in decision making.</p>
<b>Statutory consultees</b>	
Hampshire County Council	We agree with the draft strategic objectives.
Bracknell Forest Borough Council	We welcome Objective 2 Housing ‘ <i>Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District.</i>

Respondent	Response
Wiltshire Council	<p>Thank you for consulting Wiltshire Council on your Local Plan Review Scoping Report and SA Scoping Report.</p> <p>We welcome the objective included in your Local Plan Review Scoping Report to meet your objectively assessed need over the Western Berkshire Housing Market Area.</p> <p>As we have a cross boundary relationship it is encouraging to see that the Wiltshire Core Strategy and Minerals and Waste Core Strategies are included in the PPP section of your SA Scoping Report.</p> <p>As you are aware, we are also reviewing our Local Plan. We agree that the preparation of our Local Plans will require close liaison and continued consultation as details emerge, especially as we share cross boundary features such as the North Wessex Downs AONB, the Kennet &amp; Avon Canal and the A4.</p> <p>At this stage we have no further comments to make. Please continue to keep us informed of your plans progress.</p>
Newbury Town Council	<p>Our principal comments relate to the Strategic Objectives in the Scoping Report. The numbering is ours, and does not indicate priority.</p> <ol style="list-style-type: none"> <li>1. We appreciate the need to meet so far as possible the housing development targets set by the Strategic Housing Market Assessment. We fully support the objectives for affordable and social housing. However, the latter objectives will require firm action by the Planning Authority, for which the support of the Inspectorate will be necessary and should be sought.</li> <li>2. Particular attention is needed to the housing requirements of key workers, for whom suitable housing types and tenures should be devised and constructed.</li> <li>3. West Berkshire Council has standards for parking and amenity space for houses, but not living space. In consequence, some spatially very limited accommodation is being put forward by developers. Is this desirable? The only relevant Strategic Objective refers vaguely to “Sustainable and Quality Development”. The Local Plan should have some perspective on the matter, perhaps with reference to the rules for public accommodation drawn up some years ago in London, or some other criteria. See <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf</a>.</li> <li>4. We welcome the objective to provide additional employment land. However, further measures will be needed to encourage new businesses, enable existing businesses to grow, and attract new businesses from outside. A list of steps to this effect is described in the Town Plan, but in summary, they include additional employment land, flexible rental and</li> </ol>

Respondent	Response
	<p>planning terms (for example by a Local Development Order), provision of Incubation Hubs and Accelerator Hubs, and integration with the higher education institutions in West Berkshire. Given such measures, West Berkshire can benefit from the substantial opportunities represented by the Oxford-Cambridge Corridor and the Smart City Cluster.</p> <p>5. Addressing these opportunities will require greater focus on business development than West Berkshire Council appears to deploy at present. Business development actions previously identified in the Newbury Vision have not been implemented. We suggest that the Strategic Objective “Economy” should be rephrased “Business Development”. We recommend that WBC employs more resources to deliver these opportunities, and that the activities of the Executive in this regard are more widely communicated than at present.</p> <p>6. Whatever Local Plan is approved, it can at present be overridden by Permitted Development Rights on commercial property. Unremitting pressure should be exercised through political channels to secure the reversal of this disruptive Government policy. The Government has advised that the remedy of an Article 4 Direction is available and not burdensome; we recommend that whether this is in fact the case is tested by the Planning Authority.</p> <p>7. At present, the policy and planning effort of West Berkshire Council is focussed overwhelmingly on housing development, and in responding to proposals from developers for housing. The infrastructure implications are relegated to a separate plan. We do not agree. Spatial planning for infrastructure should occur at the same priority as for housing and business, and should therefore be part of the Local Plan itself, as otherwise the housing allocation will crowd out other requirements. These include extension of:</p> <ul style="list-style-type: none"> <li>• primary, secondary and higher education;</li> <li>• public open space;</li> <li>• medical services;</li> <li>• age support, in particular day care centres and care homes;</li> <li>• road and rail transport links;</li> <li>• cultural, leisure and sporting facilities.</li> </ul> <p>8. Given the population growth from new housing and the expected strong proportionate increase in the older population, the Local Plan should include an assessment of changes in population size and profile during the Plan period. Social infrastructure planning across the District should be based on those assessments.</p> <p>9. West Berkshire Council’s present support for leisure and culture is mainly limited to the assets which it owns directly. We recommend that an audit is carried out of the cultural, leisure, and sporting assets of the District, and a view on how they is developed, in order to prepare a policy for tourism. The absence of such a policy for West Berkshire has resulted in (for instance) lack of a policy for visitor information or for the tourist coach trade. Leisure, culture, and tourism are the</p>

Respondent	Response
	<p>second business interest of West Berkshire after commerce and industry. Officer support and Executive attention should in our submission be directed to developing them, in partnership with Town and Parish Councils.</p> <p>10. In the longer term, consideration should be given as whether West Berkshire should provide a hub or hubs for major cultural, leisure, and sporting events, by the provision of a major concert hall, conference venue, and/or sporting arena, together with the appropriate visitor accommodation. If so, space should be reserved accordingly.</p> <p>11. West Berkshire has a good record in providing and supporting public open spaces, in collaboration with Parish Councils, and in conditioning such space with major developments. However, it seems to us that the policy framework for this is unclear. How is such space, scattered across the District, to be protected? What steps are needed to ensure that they are all maintained to a common standard in the public interest?</p> <p>12. The Town Plan contains detailed proposals for development of road and rail transport, prepared after consultation with the portfolio holder for transport. In particular, we draw attention to the lack of a junction connecting the two north-south trunk roads through Newbury. We support West Berkshire Council's plans for pedestrian and cycle links and are prepared to provide funding and other resources to achieve them.</p> <p>13. The Town Plan's section on education was drawn up after consultation with the portfolio holder for education. We recommend involvement of business in a possible business-sponsored Free School and/or University Technical College. Vocational education should be developed according to the needs of local business. In addition, West Berkshire does not contain any institutions of University standard. To retain more young people for higher education in West Berkshire, we suggest that Universities in nearby cities be approached with the aim of locating one or more campuses or business schools in the District. Space should be reserved for these purposes.</p> <p>14. No Strategic Objectives are stated for the Environment, other than the mitigation of climate change. It is suggested that the Local Plan should include specific objectives for air and water quality and biodiversity, in which Parish Councils could have a principal role. Strategic Objectives should also be given for recycling, which is a West Berkshire Council function.</p> <p>15. We are largely content with West Berkshire Council's policies and actions on heritage. We would point out, however, that local listing is currently entirely dependent on volunteers, and contingency plans should be made in case the present arrangements should fail at some point.</p> <p>16. The Strategic Objectives make no reference to health and well-being, other than under the heading of Housing. As pointed out above, health and well-being have a consequence for spatial planning which should be considered. Health</p>



Respondent	Response
	<p>disparities and variations between areas and communities should be studied, and may well be found to have planning implications.</p> <p>17.The Strategic Objectives make no specific reference to the North Wessex Downs Area of Outstanding National Beauty. In the light of recent planning cases, we suggest that applications should be permitted on the AONB which support development of the rural economy and the personal amenity of current residents, as these pay for maintenance of the AONB in its present state. The present policy is too based on the premise that there should be no change.</p>
Streatley Parish Council	<p>Regarding the Strategic Objectives as outlined in Appendix 1, Streatley Parish Council agrees with them as being most appropriate. The only one we would recommend strengthening would be number 8: Green Infrastructure and Healthy Living. We believe it is increasingly important that our green environment receives even more protection than at present. The AONB is a very precious asset for the district and for future generations and should be enhanced rather than simply maintained as the NPPF requires.</p>
Thatcham Town Council	Yes
Holybrook Parish Council	<p>The draft strategic objectives, as identified in your appendix 1, are a good starting point and the Parish Council support, in particular sustainable development and green infrastructure. However, the draft objectives fail to adequately address some of the main issues faced by many of urban communities within the district. It is disappointing that general infrastructure has not been included as the existing structures are already at saturation point and this needs to be urgently addressed.</p>
Pangbourne Parish Council	<p>Suggest re-title of Climate Change and Sustainability:</p> <p>If these objectives are in order of importance, I would suggest that “Combating Climate Change” needs more context. As a small district authority seeking to combat a complex global problem, whatever WBC does in, for example, “minimising demand for energy”, (especially given its ambitious housing targets and residents’ heavy reliance on private transport) can never be more than the slightest pinprick in the hide of an elephant. It’s potentially more productive to focus on those issues where you can have an effect on the ground – which is why I would team this objective up with sustainability. The Sustainability Appraisal Scoping Report (pp17-22) succinctly summarises the key issues for WBC and the three other Councils in the West of Berkshire and offers a broad indication of how they should be approached, demonstrating how WBC and the other authorities can make a long-term contribution to combating climate change.</p> <p>Economy:</p> <p>This one should be next in priority order. A “strong, diverse and sustainable economic base” within easy reach of London is arguably the biggest single factor which has made the Thames Valley the prosperous and expanding area it is today.</p>

Respondent	Response
	<p>Sustaining this economic strength over the next twenty years, however, will not be easy. The bulk of new investment will remain in the service sector where some big structural and technological changes are currently in train. New retail investment is not an unmixed blessing in so far as it creates winners and losers – for example, the on-going decline of the Kennet Centre area in Newbury as the big brands have moved their focus to the other end of the town centre. Multiple retailing has now largely gone ex-growth in terms of job creation and the future will be dominated by the big on-line operators, albeit with opportunities for small specialists in suitable locations. Over the past decade economic insecurity has become a fact of life for many households – even in the Thames Valley – whether in the form of zero-hours contracts, premature retirement or below-inflation pay increases – all of which are affecting their spending decisions. The short term outlook for business and consumer spending is uncertain, which may well make it harder to attract the new investment we need to sustain our growth.</p> <p>Housing:</p> <p>A strong local economy tends to attract inward migration which affects the location, price and quality of the new homes and the infrastructure required to support development. According to the joint West of Berkshire Spatial Planning Framework, achieving the development targets for the four authorities in the Berkshire Strategic Housing Market Assessment over the period 2013 to 2036 means an additional 65,600 houses to be built, or nearly 3,000 a year, roughly one third of which will be built on land not yet allocated for development. The spin-off in new jobs and investment will obviously be very significant, but the underlying economy still needs to be strong. As a recent study by the IFS has concluded, “Areas seeing lots of new developments aren’t guaranteed strong economic growth. And growth doesn’t necessarily rely on large-scale property development.” The economy ultimately drives the property market, not vice versa.</p> <p>Town, district and local centres:</p> <p>While the exodus of banks and building societies has left a few gaps in these centres, a relatively high level of local business optimism has ensured that many are now occupied by small, specialist retailers whose main complaint is the burden of business rates. Contrary to popular belief, however, the IFS study quoted above concluded that there is no relationship between changes in local authorities’ business rates tax bases and local economic growth. The strength of the local economy is the main influence on the success of high street businesses.</p> <p>No comment on the remaining objectives.</p>
Stratfield Mortimer Parish Council	<p>It is understood that the draft strategic objectives are derived from many sources, some of which are effectively mandatory. As such they cannot be argued with. However, the wording of the draft objectives is not always very clear. For instance, what does ‘a strong network of multi-functional green infrastructure which provides benefits for health, the environment and enhances the overall quality of life of sustainable communities.’ actually mean? Rewording the objectives in plain English would make them more accessible.</p>

Respondent	Response
	<p>Additionally, but far more importantly, there seems to be no objective(s) which reach the heart of the matter as to what individuals are hoping the resulting policies and hence developments will deliver. What seems to be lacking is a sense of what West Berks will look like/feel like in 2036-50. If you do not have a dream how can you have a dream come true? If there was a vision element then the how and why of many of the more detailed elements becomes more obvious.</p> <p>As an example central government commissions a happiness survey each year and is committed to trying to increase the nation's happiness. Does not planning policy have a part to play in that? Perhaps more pertinently there is no mention of community in any of the objectives. Surely a spirit or sense of community underpins what makes a successful town, village or District. We suggest there should be one or more objectives focussing on that aspect of planning.</p> <p>There also seems to be no real recognition of health and wellbeing in the objectives. There is passing reference to healthy living in the context of green infrastructure but nothing more substantial than that. Surely the health of the residents of West Berks must be a major objective. This is especially so when there has been a marked change in policy in the recent past to now emphasise the 'joined up provision' of health and social care.</p> <p>As far as the individual draft objectives are concerned our comments are, (in addition to the request for more plain English):-</p> <p><b>1. Climate Change</b></p> <p>To mitigate and adapt to the effects of climate change and minimise demand for energy and other resources. This objective is very far reaching and could raise expectations beyond what is possible. For instance, taking this at face value, the blanket minimisation of energy demand could lead to the banning of all cars. As such we believe that a 'reasonableness' clause needs inserting.</p> <p><b>2. Housing</b></p> <p>Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District.</p> <p>This is an example of where future change is being considered but in rather a passive way. In reality what does responding to the changing demographic and health profile of the District really mean? If it means to provide more dwellings suitable for an ageing population, why not say so. Equally why not consider other coming changes as well as the ageing population?</p> <p><b>3. Sustainable and Quality Development</b></p> <p>To ensure provision of sustainable developments of high quality design, construction and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all.</p>

Respondent	Response
	<p>We would very much support the general thrust of this objective and feel that its successful implementation could go a long way toward reconciling the need for more houses and the natural reluctance of existing residents to see their local environment altered for the worse.</p> <p>The phrase “ while using land efficiently with higher density housing” would be a lot clearer than ‘and efficiency (including land use)’.</p> <p>Many people will consider that there is an inherent contradiction in this objective. Could they not consider that developments of higher densities do not necessarily and contribute to an attractive, safe and accessible environment?</p> <p><b>4. Economy</b></p> <p>To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.</p> <p>Again this is a very worthwhile objective which perhaps should be tempered with words such as ‘while respecting the local environment’</p> <p><b>5. Town Centres</b></p> <p>To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities.</p> <p>Once again while supporting the objective we feel there ought to be some caveat(s) attached or would this objective allow some very unfriendly neighbour development?</p> <p><b>6. Culture</b></p> <p>Together with other partners, to develop and promote the cultural distinctiveness and heritage of the area to ensure it makes a positive contribution to the future wellbeing and sustainability of West Berkshire’s economy and communities. This is a laudable new objective but it is not clear what culture actually means in this context, and, as it is new, some examples of what it would mean in planning terms would be useful.</p> <p>It also seems that heritage is brought into this objective and not into other objectives but heritage also has its own objective. This does seem a trifle odd.</p> <p><b>7. Heritage</b></p> <p>To conserve and enhance the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside.</p> <p>Further to the previous comment should Heritage now include non-physical elements as it is mentioned in the cultural objective?</p> <p><b>8. Green Infrastructure and Healthy Living</b></p>

Respondent	Response
	<p>To ensure that West Berkshire contains a strong network of multi-functional green infrastructure which provides benefits for health, the environment and enhances the overall quality of life of sustainable communities.</p> <p>This is a very laudable objective. However, none of the objectives cover the wider issues of biodiversity. There is mention of multi-functional green infrastructure giving benefits to the environment, but there are many other elements which go towards a much more complete package of biodiversity improvements. Indeed it might be that there should be a separate objective for improving biodiversity.</p> <p><b>9. Transport</b></p> <p>To make provision for transport networks that support sustainable growth in West Berkshire and to promote low emission transport choices.</p> <p>While supporting this objective should it not also be linked to other non-transport issues that reduce the need to make journeys? For instance the provision of high speed broadband and the provision of local employment and facilities that reduce the frequency and length of trips?</p> <p><b>10. Infrastructure</b></p> <p>To ensure that infrastructure needs (physical and social) arising from the growth in West Berkshire are provided to support and keep pace with development in accordance with the detail set out in the Infrastructure Delivery Plan. This objective is welcomed but, unfortunately, the existing Infrastructure Delivery Plan does not seem to have been delivered. If this is likely to be the case in the future, (for reasons outside WBC's control?), should other objectives or policies not be introduced which recognise this ever widening gap and approach the problem from a different angle?</p>
Burghfield Parish Council	Yes. You could emphasise an important point by inserting the words “energy efficiency and” after “including” at the beginning of line 2 under “3. Sustainability and Quality Development”.
Burghfield NDP Group	Yes. You could emphasise an important point by inserting the words “energy efficiency and” after “including” at the beginning of line 2 under “3. Sustainability and Quality Development”.
Historic England	Turning now to the Scoping Report, we welcome and support, in principle, Strategic Objective 7 for Heritage. However, we would prefer it to refer to the significance and special interest of heritage assets (what it is that makes them important).
Sport England	Yes
Savills (UK) Ltd for Thames Water	No objection
Environment Agency	We are pleased to see objectives for climate change, Green Infrastructure and Infrastructure in general.

Respondent	Response
	<p>As part of the 'Green Infrastructure and Healthy Living' objective the conservation and enhancement of watercourses and their riverbank habitats need to be included here as 'blue infrastructure.'</p> <p>As part of the 'Infrastructure' objective we would expect to see sewage treatment infrastructure covered with any impact on receiving watercourses from discharge from these sewage treatment works taken into consideration. We do not want to see any deterioration of the water quality in watercourses as a result of the proposed growth and the increase in flows to sewage treatment works.</p> <p>An additional objective should be about fluvial flood risk management. Another objective should be about pollution prevention and water quality including surface water and ground water quality protection.</p>
<b>General consultation bodies</b>	
Theatres Trust	<p>Yes - In particular we welcome the identification of 'Culture' as a strategic priority in line with both the current and draft revised versions of the NPPF. It must be ensured that the objective covers culture in a broad sense, relating not just to West Berkshire's cultural heritage which makes it distinct but also to the area's facilities which contribute to the cultural well-being of local people and attract people to the area such as theatres, cinemas and pubs.</p> <p>We also recommend that the scope of 'Town Centres' is amended to refer to cultural uses alongside "shopping, leisure and community activities" to better accord with definitions provided by the NPPF.</p>
Mid & West Berks Local Access Forum	Yes. We particularly endorse inclusion of objective 8 'Green Infrastructure & Healthy Living' as an objective but emphasize that the provision of off-road paths and public open space for informal air & exercise of the human population should be an important component.
British Horse Society	Yes but Objective 8 'Green Infrastructure and Healthy Living' must recognize the needs of equestrian activities and needs if the equestrian economy is to thrive in West Berks.
Reading Gospel Hall Trust	Yes
<b>Other stakeholders</b>	
Robert Wallace	<ol style="list-style-type: none"> <li>1. - NO - I doubt W Berks CC can do anything to affect Climate change</li> <li>2. Yes THE BIGGEST CHALLENGE we face</li> <li>3. Yes</li> <li>4. Not much you can do about it directly</li> </ol>

Respondent	Response
	5. Yes - a major challenge 6. Tough to do in a time of cuts 7. OK 8. OK 9. Another major problem 10 OK
Christopher Gent	We agree with the draft objectives
Neil Richardson	Housing – Assessed Need. The requirements of particular groups such as FTBs, older people and self – builders need to be taken into account.
David Lister	Yes
William Graham	Yes
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Sulham Estate	<p>On behalf of our client, we consider that draft strategic objectives seem to form an appropriate basis for the foundation of the review to the Local Plan. In particular we consider that the following draft strategic objective is of great significance:</p> <p><i>“Together with other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographics and health profile of the District.”</i></p> <p>We support the delivery of housing to meet the housing needs across the District and consider that this should be achieved through the allocation of a range of sites with a preference for those in sustainable locations and well related to existing settlements. In addition to meeting the housing needs across the plan period, we also note the importance of the council maintaining an up to date Five Year Housing Land Supply. We suggest that the allocation of smaller to medium sites which are able to deliver in the short to medium term is instrumental in complimenting the larger allocations which will deliver later in the plan period and ensuring that there is a consistent delivery of needed homes. Our client’s site at Hall Place Farm is very well placed to serve this role and, on this basis should be considered for allocation.</p>
Barton Willmore for Graham Child	On behalf of our client, we consider that the draft strategic objectives appear to cover the most pertinent points that require consideration. In particular, we support the objective in relation to housing which states the following:

Respondent	Response
	<p><i>“Together with other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographics and health profile of the District.”</i></p> <p>We support the delivery of housing to meet the housing needs across the District and consider that this can be achieved through the allocation of a range of sites. With regard to meeting the assessed need to 2036, our client would highlight the need to also achieve the required 5 year housing land supply. In this regard our client would draw the Council’s attention to small/medium sized sites which have the ability to deliver housing in the short term and benefit the Council’s 5 year housing land supply. Our client would again highlight that their site at Pangbourne Hill is fits into this category and should be considered for allocation.</p>
Bewley Homes	<p>Engagement should not be limited to those authorities within the West Berkshire Housing Market Areas. Effective and on going joint working between strategic plan making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.</p>
Boyer Planning for Spitfire Bespoke Homes	<p>Spitfire generally support strategic objective 2 (Housing) of the West Berkshire Local Plan Review to 2036 where it states that the Council will work with the other Berkshire authorities within the Western Berkshire Housing Market Area to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. Spitfire also support the objective to provide a mix of house sizes, types and tenures, through a variety of delivery methods.</p> <p>However, in relation to strategic objective 2, Spitfire make the following key points:</p> <p><b>i) The Local Plan Review has been substantially delayed &amp; the associated consequences for the Council’s housing land supply position</b></p> <p>The Council’s existing spatial strategy is set out in the 2012 Core Strategy. Policy CS 1 (Delivering New Homes and Retaining the Housing Stock) of this document states:</p> <p>‘An update of the Strategic Housing Market Assessment (SHMA) (so that it accords with the requirements of National Planning Policy Framework, paragraph 159) will be undertaken within <u>3 years of the adoption of the Core Strategy</u>. This will be carried out in co-operation with neighbouring authorities within the Housing Market Area. If the updated SHMA indicates that housing provision within the District needs to be greater than currently planned, a review of the scale of housing provision in the Core Strategy will be undertaken’ (<u>Our emphasis</u>).</p> <p>Despite the clear requirement for the Core Strategy housing requirement to be reviewed within 3 years of the plan’s adoption in 2012 and the publication of the Berkshire SHMA over two years ago, it is only now that the Council has</p>



Respondent	Response
	<p>progressed to the earliest possible consultation stage relating to a new Local Plan. This has resulted in underlying under-delivery against the defined subsequent objectively assessed housing need (OAHN). In addition, it has resulted in the Council becoming subject to a housing land supply shortfall, contrary to the requirements of NPPF paragraph 47. This housing land supply deficit was confirmed at the 2017 public inquiry relating to a proposal for up to 401 dwellings at Land adjacent to Hilltop, Oxford Road, Donnington, Newbury (PINS Ref. APP/W0340/W/16/3143214), where the Inspector stated:</p> <p><u>'On that basis, the main parties agree that a five-year supply of deliverable housing sites cannot be demonstrated.</u> The relevant policies for the supply of housing therefore attract less weight and the National Planning Policy Framework (the Framework) paragraphs 49 and 14 are engaged<sup>18</sup>. The presumption in favour of sustainable development in paragraph 14 of the Framework is agreed to apply' (<u>Our emphasis</u>) (paragraph 19).</p> <p>It follows that the Council's continued delay in producing a new Local Plan has resulted in a 'planning by appeal' approach whereby sites not identified in a plan-led manner have come forward to fill unmet housing need shortfalls. Given the continued delay in reviewing the Local Plan and the associated consequences of this delay (i.e. a housing land supply deficit), it follows that this Local Plan Review must proceed at the earliest opportunity and allocate sites of varying scales and in a mix of geographic locations to ensure that necessary future needs are met and appropriate flexibility is built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p><b>ii) A minimum housing requirement</b></p> <p>In March 2018, the Government published a draft NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft NPPF, the Prime Minister referred to the decades of housing under-delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p> <p>...</p> <p>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places.</p> <p>So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their</p>

Respondent	Response
	<p>potential. It creates and exacerbates divisions between generations and between those who own property and those who do not’.</p> <p>In a supporting Ministerial Statement, the Secretary of State (‘SoS’) for Housing, Communities and Local Government (Sajid Javid) stated:</p> <p>‘The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans’.</p> <p>Paragraph 36 of the draft NPPF goes onto state:</p> <p>‘Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</p> <p>a) Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area’s objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that <u>unmet need from neighbouring areas is accommodated where it is practical to do so</u> and is consistent with achieving sustainable development;’ (<u>Our emphasis</u>)</p> <p>The housing requirement to be met across the District is to be clearly expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement must be expressed as an absolute minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet such challenging housing targets. Any failure to not allocate a level of growth substantially above this minimum figure would fail the positively prepared, effective and justified tests of soundness.</p> <p><b>iii) Meeting Unmet Needs from Adjoining Local Planning Authorities</b></p> <p>Alongside meeting its own OAHN, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Policy H1 of the Pre-Submission Draft Reading Borough Local Plan issued for consultation in November 2017 stated:</p> <p>‘Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036.</p>

Respondent	Response
	<p>The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.'</p> <p>It follows that the West Berkshire Local Plan should make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that it's OAHN cannot be met inside its tight administrative boundary (paragraphs 4.4.3 and 4.4.4). This places a requirement upon the District to plan for a yet higher level of housing growth.</p>
Mark Carter for Mr R.L.A. Jones	<p>The Respondent welcomes the Strategic Objectives and particularly Objective 2 "Housing" to ensure that the need for housing is met up to 2036 and also that a mix of housing will be provided. However it should be explicitly stated that the need for new housing will be met through the identification and allocation of new housing sites (or sites to replace already allocated housing sites that have not come forward.</p>
Deloitte for Green Park Business Park	<p>The National Planning Policy Framework (2012) sets out a presumption in favour of sustainable development. It encourages the use of previously developed land promoting mixed use development in locations that are, or can be made sustainable.</p> <p>Policy CS 9 of the West Berkshire Core Strategy 2006-2026 (Core Strategy) directs major office development to West Berkshire's town and district centres and then sequentially edge and out of town locations, including Protected Employment Areas.</p> <p>The Core Strategy highlights that 14% of West Berkshire's population works in Reading and identifies opportunities to invest in transport services at Green Park by "improving sustainable transport links to Reading through joint working, particularly bus, cycle and pedestrian routes along the A4 corridor and the proposed new station". West Berkshire work with Reading Borough Council on joint transport activities "particularly related to the need to deliver sustainable transport solutions to reduce and manage the growth of congestion around the A4 and the M4 and surrounding transport corridors".</p> <p>The Scoping Report seeks to identify future levels of housing and employment land need as well as other land uses and infrastructure provision for West Berkshire, up to 2036. GPR welcomes the Local Plan Review, and its efforts to identify such strategic issues that need to be addressed by the Local Plan over the period up to 2036. It is important to ensure that there is an up to date evidence base for employment land by ensuring the Economic Market Area and Economic Development Needs Assessment remain relevant. Part of this approach is ensuring that any future Local Plan strategy for housing and employment is reflective of the needs of the area.</p> <p>Green Park provides an important employment and residential location for West Berkshire and Reading.</p> <p>GPR, therefore, supports the Draft Strategic Objectives set out in Appendix 1 of the Report, in particular No.2 Housing to</p>

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	<p>ensure the assessed need for housing is met. It identifies a variety of delivery methods and there should be recognition in the drafting of the Plan and spatial strategy which underpins it, of the sustainable role of development of employment and residential uses at Green Park can provide. This is particularly in the context of the new railway station at Green Park and the choice of transport modes that will be available from 2019/2020.</p> <p>GPR is also supportive of Objective 4 'Economy', which seeks to facilitate and support a strong, diverse and sustainable economic base provision of employment land. The Objective looks to identify future employment land in order to provide for a range of local job opportunities. This will be integral to a thriving West Berkshire economy and the wider Thames Valley area, which is fast developing as a key business destination just outside of London.</p> <p>To assist West Berkshire with its review of future employment land, GPR request that the Council continues to recognise Green Park as a key employment area in the Local Plan Review. We ask for this to be done in tandem with the continued investment and enhancement of sustainable transport and highways infrastructure improvements. This is because the Park set to become an enhanced regional centre with the onset of the new railway station due to be delivered by March 2020, which will have an impact in strengthening its role as a key housing and employment hub. It is important that West Berkshire Council and Reading Borough Council aspirations are aligned to ensure that provision of infrastructure in the wider Reading area is considered as a whole.</p>
Fisher German for Mr Musgrave and Begley	<p>Largely agreed, but it is considered that the rural area should be supported further, by providing adequate housing which meets the needs of both the District's urban and rural communities over the lifetime of the plan.</p> <p>Suggested rewording:</p> <p><b>2. Housing</b></p> <p>Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District including urban and rural communities.</p>
Gladman Developments	<p>It is considered essential that the strategic objectives must represent an appropriate balance between the economic, social and environmental objectives of the planning system in order to shape a local plan that can promote a sustainable pattern of development. The objectives contained within Appendix 1 of the Scoping Report have the potential to achieve this goal and it will be important that any associated vision, strategy and policy wording fully supports the sustainable growth potential of the area over the plan period.</p>
Hallam Land Management	<p>We fully support the Strategic Objectives as set out in Appendix 1 and have no further comments</p>

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Nexus Planning for Pangbourne Beaver Properties	<p>The draft strategic objectives at Appendix 1 cover a range of issues, but we note that the second of those deals with Housing and states that:</p> <p>“Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District”.</p> <p>This objective is supported.</p>
Nexus Planning for Croudace	<p>The draft strategic objectives at Appendix 1 cover a range of issues, but we note that the second of those deals with Housing and outlines that:</p> <p>“Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District”.</p> <p>Croudace Homes has no objection to the Strategic Policies as set out.</p>
Pegasus Planning for Donnington New Homes	<p>Yes – these are all valuable objectives to work towards when reviewing the Plan. However, some of the Strategic Objectives are more valuable than others, and should be given greater weight. These are climate change (specifically flood mitigation in new development), housing, sustainable and quality development, and green infrastructure.</p>
Pegasus Planning Group for Donnington New Homes	<p>Yes – these are all valuable objectives to work towards when reviewing the Plan. However, some of the Strategic Objectives are more valuable than others, and should be given greater weight. These are housing, sustainable and quality development (specifically accessible homes for older people), culture (specifically tourism), green infrastructure and healthy living (specifically the provision of green infrastructure with new development), and infrastructure (specifically community uses).</p>
Pegasus Planning for Wasing Park Estate	<p>It would be useful for the strategic objectives to include reference to supporting economic growth in rural areas and encouraging diversification, where appropriate.</p> <p>It is considered that the strategic objectives should recognise the importance of sustainable economic development in the rural areas. The Draft Revised National Planning Policy Framework (NPPF) was published for consultation from 5th March until 10th May 2018. Paragraphs 84 and 85 of the Draft Revised NPPF make clear the importance of the rural economy. The West Berkshire Local Plan Review should therefore facilitate a prosperous rural economy, and particularly</p>

Respondent	Response
	<p>the aims and objectives of the Wasing Estate Plan, which is currently being produced by the Wasing Estate (see Question 8 below). Paragraph 84 requires planning policies and decisions to enable:</p> <p>“a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well designed new buildings;  b) the development and diversification of agricultural and other land-based rural businesses;  c) sustainable rural tourism and leisure developments which respect the character of the countryside; and  d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”</p> <p>Paragraph 85 continues that; “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.”</p> <p>Paragraph 85 suggests that local authorities should adopt an even more flexible approach when assessing the accessibility credentials of local commercial/business and community needs in rural areas. It accepts that sites for these uses may have to be found outside the existing settlements, in locations that are not well served by public transport.</p> <p>It is considered that the Local Plan Review Strategic Objectives includes specific reference to the rural economy, diversification and sustainability of the rural areas.</p>
Pro Vision for Rivar	<p>Generally, consideration should be given to restructuring the objectives to demonstrate that the three overarching objectives of the planning system (set out in the draft NPPF at Paragraphs 8 and 9) will be delivered, taking local circumstances into account. We would comment on each of the 10 draft objectives as follows:</p> <ul style="list-style-type: none"> <li>• Climate Change. The objective should not be to minimise the demand for energy (which implies restricting growth). It should be to move to a low carbon economy.</li> <li>• Housing. The objective should be to ensure that a sufficient number and range of homes is provided to meet the assessed local need. Unless a joint spatial strategy is prepared with the other LPA's within the broadly defined HMA (which we would not support), it is not appropriate to consider the housing needs of a wider area. Only if the assessed housing need of neighbouring authorities cannot be accommodated, should cross border strategic planning be considered.</li> <li>• Sustainable and Quality Development. Agreed.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Economy. The objective should be to foster sustainable economic growth, to include making provision of sufficient employment land to meet assessed needs.</li> <li>• Town Centres. The objective should recognise that Town Centres should be allowed to grow and change, and to include a diverse mix of uses (including housing, offices and live/work) that reinforces their individual sense of place.</li> <li>• Culture. Agreed.</li> <li>• Heritage. Agreed.</li> <li>• Green Infrastructure and Healthy Living. Agreed (although the definition of multi-functional greenspace needs to be reviewed - see below).</li> <li>• Transport. Agreed .</li> <li>• Infrastructure. Agreed.</li> </ul>
Pro Vision for Audley Group	<p>We observe that this objective should be more explicit about the various components of the objectively assessed housing need over the plan period, especially meeting the needs of a growing elderly population (and given that the council’s latest SHMA specifically distinguishes this type of housing need from conventional housing – see response to Q7 below). It should more closely reflect the National Planning Policy Framework (NPPF), for example:</p> <p>Paragraph 7: one of the three strands of ‘sustainable development’ is the “social role”, which includes “providing the supply of housing required to meet the needs of present and future generations”. Implicit within this national objective, is planning for the needs of the ageing population.</p> <p>Paragraph 17: The “Core planning principles” include “Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”.</p> <p>Paragraph 50: “Deliver a wide choice of high quality homes” including planning for “the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes”.</p> <p>Paragraph 159: “Local planning authorities should have a clear understanding of housing needs in their area” and should “address the need for all types of housing, including affordable housing and the needs for different groups in the community”, which includes “older people”.</p> <p>The importance of planning to meet the objectively assessed needs of specific groups is reflected in the proposed changes to the NPPF published earlier this month, for example, paragraph 62:</p> <p><i>“Within this context, policies should identify the size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers<sup>21</sup>, people who rent their homes and people wishing to commission or build their own homes)”.</i></p> <p>This National Policy reflects the urgent and growing need for more specialist accommodation for older people. National Planning Practice Guidance refers to:</p>

Respondent	Response
	<p><i>“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013)(NPPG Paragraph: 021 Reference ID: 2a-021-20160401). This ‘critical need’ is highlighted in the West Berkshire Sustainability Report, also published for consultation. This states that</i></p> <p><i>“Future demographics indicate that the population of the area as a whole is projected to rise to over 166,000 by 2036. Significantly, the population of over 65s is forecast to grow by over 59% in the period 2016-2036 and the over 85s by 148% over the same period. This is above the national average and will call for a much increased demand for suitable housing, health care services and facilities for the elderly. The increased prevalence of those with long term illnesses and disability (closely linked to an ageing population) living longer along with a desire for independence, will have the similar effect. Equally, the need to take more personal control of health and wellbeing, including obesity, should increase demand for green infrastructure and health facilities. A key challenge has been identified to explore any link between the District Health profiles and air quality” (SA Scoping Report Table 2; page 17).</i></p> <p>Paragraph 65 of the Draft Revised NPPF should also be noted. This addresses the relationship between the provision of affordable housing in major developments and the provision of “specialist accommodation” such as “purpose-built accommodation for the elderly”.</p> <p>In the above context it is proper that the revised Local Plan should make explicit provision for increasing the supply of specialist accommodation for older people. A recent Committee Report publication by HCLG – ‘Housing for Older people’ - makes some important recommendations in relation to the preparation of Local Plans (<i>Housing for Older People</i>, Second Report of Session 2017-19; Communities and Local Government Committee (5 Feb 2018)). Paragraph 122 states:</p> <p><i>“We believe that older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences. This will include, across the social and private sectors, smaller, or better designed, general needs housing, accessible housing, specialist housing, including retirement homes and extra care housing, and cohousing. To enable them to make this choice, and move to a home which better suits their needs, the guidance required under the Neighbourhood Planning Act 2017 should recommend that:</i></p> <p><i>Local authorities produce and publish a strategy explaining how they intend to meet the housing needs of older people in their area, including the scale and mix of housing and the tenures needed, and setting out the evidence relating to current housing need.</i></p> <p><i>Local Plans should, based on an assessment of local need, identify a target proportion of new housing to be developed for older people and identify suitable well-connected sites, close to local amenities. They should identify a range of different types of housing, including accessible homes, extra care housing and smaller mainstream homes to be built. The number of homes developed against this target should be published each year.</i></p>



Respondent	Response
	<p><i>There should be greater collaboration within local authorities between planning, social care, health and housing teams, particularly on the production of Local Plans. Local authority planning, health and social care teams should work together to assess the savings to health and social care budgets which may arise from additional specialist housing in their area and consider this in the context of negotiations over planning charges.</i></p> <p><i>Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need to health and social care services to be gained”.</i></p> <p>It is important that the revised Local Plan positively plans for delivering an appropriate range of specialist accommodation to offer genuine options for independent living, for example with specific site allocations for C2 use rather than housing sites which may be capable of accommodating C2 use (which could otherwise be priced out by conventional C3 market housing values) and does not burden schemes with obligations including affordable housing.</p> <p>It is now widely recognised that traditional nursing homes provide only a limited answer to the challenge of an ageing population and Local Plans need to be more positive in supporting the full range of modern specialist care options. (Please also note our comments under Question 7 regarding National Planning Policy Guidance and the definition of specialist elderly accommodation).</p> <p>Secondly, we observe that the draft objectives do not explicitly cover the rural areas of the district. It would be appropriate to include an objective to sustain rural communities i.e. support development that contributes to the social, economic, and environmental interests of the rural communities, recognising the positive and valuable contribution that can be made to that objective by the elderly population as part of socially cohesive and inclusive communities.</p> <p>Development needs and opportunities in the countryside are often very different to the urban areas, but the draft objectives do not make any such distinction. The appropriate spatial strategy is to continue to direct growth towards the existing hierarchy of settlements, but the plan should also explicitly support and manage sustainable development in the rural areas, recognising as in the case of Audley (and other providers) that older persons accommodation and care villages already exist in these locations. These institutions can and do make a significant contribution to the prosperity of the rural economy, both through the staff they employ from the local area and the local supply chain businesses, and the residents and their visitors who make use of local services and facilities. This economic and social activity should not be underestimated, and is in line with the requirements of national policy, which includes a need to:</p> <p><i>“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.”</i></p>

Respondent	Response
	<p>And</p> <p><i>“promote the retention and development of local services and community facilities in villages, such as shops, meeting places, sports venues, cultural buildings, public houses and places of worship”. NPPF para 28</i></p> <p>This theme is carried forward and expanded in the Revised Draft NPPF. Draft paragraph 85 states:</p> <p><i>“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.</i></p>
<p>Pro Vision for Greenham Trust</p>	<p>The Trust wishes to make the following observations about the draft objectives to ensure that the Revised Local Plan is based on a strong foundation for promoting sustainable development.</p> <p>Draft Objective 3 – Sustainable and Quality Development is currently drafted as</p> <p><i>“To ensure provision of sustainable developments of high quality design, construction, and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all”.</i></p> <p>To ensure that this is consistent with national policy, it would be appropriate for this definition to be expanded to clarify that good design is also about ensuring that developments function well (i.e. are fit for purpose), are affordable i.e. not overburdened with design requirements, and deliverable, and can be readily adapted to meet changing needs in the future (NPPF paragraph 58 and repeated at paragraph 126 of the Draft Revised NPPF published in March 2018).</p> <p>Objective 4 – Economy is drafted as</p> <p><i>“To facilitate and support a strong, diverse, and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities”.</i></p> <p>The Trust generally supports this objective. As well as supporting the provision of employment land, It would, however, be appropriate to expand this definition to include explicit support for making effective use of the District’s existing employment areas (of which Greenham Business Park is one of the most significant areas). This would be consistent with Objective 7 of the Sustainability Appraisal Scoping Report:</p> <p><i>“To promote and improve the efficient of land use” and national policy (NPPF 17 [eighth bullet] and paragraph 111, and Chapter 11 of the Draft Revised NPPF).</i></p>

Respondent	Response
Pro Vision for Rootes Trustees	<p>Generally, consideration should be given to restructuring the objectives to demonstrate that the three overarching objectives of the planning system (set out in the draft NPPF at Paragraphs 8 and 9) will be delivered, taking local circumstances into account. We would comment on each of the 10 draft objectives as follows:</p> <ul style="list-style-type: none"> <li>• Climate Change. The objective should not be to minimise the demand for energy (which implies restricting growth). It should be to move to a low carbon economy.</li> <li>• Housing. The objective should be to ensure that a sufficient number and range of homes is provided to meet the assessed local need. Unless a joint spatial strategy is prepared with the other LPA's within the broadly defined HMA (which we would not support), it is not appropriate to consider the housing needs of a wider area. Only if the assessed housing need of neighbouring authorities cannot be accommodated, should cross border strategic planning be considered.</li> <li>• Sustainable and Quality Development. Agreed.</li> <li>• Economy. The objective should be to foster sustainable economic growth, to include making provision of sufficient employment land to meet assessed needs.</li> <li>• Town Centres. The objective should recognise that Town Centres should be allowed to grow and change, and to include a diverse mix of uses (including housing, offices and live/work) that reinforces their individual sense of place.</li> <li>• Culture. Agreed.</li> <li>• Heritage. Agreed.</li> <li>• Green Infrastructure and Healthy Living. Agreed (although the definition of multi-functional greenspace needs to be reviewed - see below).</li> <li>• Transport. Agreed.</li> <li>• Infrastructure. Agreed.</li> </ul>
Pro Vision for Cala Group and Wates Developments	<p>Generally, consideration should be given to restructuring the objectives to demonstrate that the three overarching objectives of the planning system (set out in the draft NPPF at Paragraphs 8 and 9) will be delivered, taking local circumstances into account. We would comment on each of the 10 draft objectives as follows:</p> <ul style="list-style-type: none"> <li>• Climate Change. The objective should not be to minimise the demand for energy (which implies restricting growth). It should be to move to a low carbon economy.</li> <li>• Housing. The objective should be to ensure that a sufficient number and range of homes is provided to meet the assessed local need. Unless a joint spatial strategy is prepared with the other LPA's within the broadly defined HMA (which we would not support), it is not appropriate to consider the housing needs of a wider area. Only if the assessed housing need of neighbouring authorities cannot be accommodated, should cross border strategic planning be considered.</li> <li>• Sustainable and Quality Development. Agreed.</li> <li>• Economy. The objective should be to foster sustainable economic growth, to include making provision of sufficient employment land to meet assessed needs.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Town Centres. The objective should recognise that Town Centres should be allowed to grow and change, and to include a diverse mix of uses (including housing, offices and live/work) that reinforces their individual sense of place.</li> <li>• Culture. Agreed.</li> <li>• Heritage. Agreed.</li> <li>• Green Infrastructure and Healthy Living. Agreed (although the definition of multi-functional greenspace needs to be reviewed - see below).</li> <li>• Transport. Agreed.</li> <li>• Infrastructure. Agreed.</li> </ul>
Savills for Englefield Estate	<p>The draft strategic objectives need to recognise the rural nature of the majority of the District, and therefore the need to support an economically, socially and environmentally strong countryside. A strategic objective should be added thus:</p> <p>“Countryside. To promote and support the vitality of the countryside within the District as a place to live and work”</p>
Joy Schlaudraff	<p>Yes, but not all together. There should be more strategic objectives, to identify, and develop wherever possible, small sites up to 50 houses, which are falling through the gap in semi-rural sites, or rural sites, which have become semi-rural, but have not been officially identified as such. There are numerous opportunities to develop suitable sites, and this would help solve the housing crisis. The problem is there is no specific guidance on this in planning policy, only that which says why development can't be built, and not on why it can. This has a prejudicial effect.</p> <p>All land which can be developed, should be developed to its maximum potential and sensitively according to character and appearance. This is common sense</p>
Turleys for Commercial Estates Group	<p>We consider that the draft strategy objectives are broadly correct, with the exception of Objective 2 'Housing'. As we explain in detail in relation to the following question, we do not consider that it is appropriate for the Council to preclude the possibility of having to address unmet housing needs from outside of the identified West of Berkshire HMA.</p>
Turleys for Berfeld	<p>We comment as follows on the draft strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Climate change: the existing strategic objective 1 in the Core Strategy states: “To exceed national targets for carbon dioxide emissions reduction and deliver the District’s growth in a way that helps to adapt to and mitigate the impacts of climate change.” In our view, this strategic objective should be similarly focussed on growth, as that is where opportunities to address climate change effects will be available; and to remind the residents of West Berkshire that this Local Plan is principal document for managing and delivering growth up to 2036.</li> <li>2. Housing: the existing strategic objectives 2 and 3 of the Core Strategy deal with Housing Growth and Housing Needs respectively. Not only does this imply recognition of the need to achieve growth, but also uses more positive language to</li> </ol>

Respondent	Response
	<p>achieve this objective. The absence of growth is noted and regrettable and should be included. Similarly, the previous objective to promote sustainable communities is also absent and creates a less positive tone for this very important objective. We consider that the Council should revisit this objective to include growth and ensure that positive language is included that reflects the opportunity that growth can deliver. The first bullet point under paragraph 157 of the NPPF states that Local Plans should “plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework”.</p> <p>The language of the NPPF in relation to meeting housing need is also more wide-ranging and specific than that used by the Council. Paragraph 159 includes the requirement to “address the need for all types of housing”, which the Council should incorporate in its objective.</p> <p>8. Green Infrastructure and Healthy Living: We support this objective and the implicit recognition that green infrastructure can contribute to healthy lifestyles and a better quality of life. It should not, however, be limited to “sustainable communities”, but to all existing and future residents of West Berkshire, whether they are deemed to meet the current definition of sustainability or not.</p> <p>10. Infrastructure: infrastructure needs are not limited to physical and social categories, there is also a need for environmental infrastructure to enhance the environment. This could include flood relief works that provide environmental benefits. Infrastructure needs are also not exclusively linked to growth. We recognise that growth does mean additional infrastructure investment and provision, but there are also existing communities that would benefit from infrastructure delivery, possibly linked to growth.</p> <p>Paragraph 156 of the NPPF sets out the strategic priorities for plan making, and includes references to infrastructure at bullet point 3 and 4, as follows:</p> <ul style="list-style-type: none"> <li>• “the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</li> <li>• the provision of health, security, community and cultural infrastructure and other local facilities”</li> </ul>
Turleys for North East Thatcham Consortium	<p>The Consortium generally agrees with the Council’s proposed scope of the Local Plan Review for the following reasons and subject to the following comments.</p> <p>Draft strategic objective 2 relates to housing. The objective states <i>“Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing will be met across the District.”</i> Whilst the Consortium generally supports that approach, it should be amended in order to ensure that the “full” objectively assessed needs of the area are met. This ensures consistency with the wording in paragraph 47 of the Framework (2012).</p>

Respondent	Response
	<p>The objective also seeks: <i>“To provide a mix of house sizes, types and tenures”</i>. The Consortium agrees that along with the overall number of homes to be provided it is of equal importance that the range of homes to be provided recognises and responds to the needs of present and future generations. This must recognise the needs arising within West Berkshire but in addition to ensuring that effective cooperation results in the delivery of the <i>numerical</i> housing requirements of the Western Berkshire Housing Market Area, the Consortium is also mindful that the cooperation should extend to the type of housing.</p> <p>The Berkshire SHMA concludes that with regards to market housing across the West Berkshire HMA 62% of housing needed will require more than 3 bedrooms<sup>4</sup>. Across all housing tenures (including affordable) the SHMA suggests that in the order of 55% housing will need to be of this size in the HMA and that the mix identified should be used to inform strategic Local Authority District-wide policies and inform the ‘portfolio’ of sites which are considered through its local plan process.</p> <p>In preparing its new Local Plan, Reading Borough Council has already acknowledged (in the Pre- Submission Local Plan of November 2017) that housing delivery, particularly on sites in the centre of the Borough, will largely be made up of smaller dwellings. Reading Borough Council has identified that this will need to be considered in the wider housing market area and their Pre-Submission Local Plan (November 2017) states that:</p> <p><i>“Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation.”</i> (paragraph 4.4.12)</p> <p>The objective should recognise the important role that West Berkshire has in meeting the needs of households not accommodated in Reading, or other parts of the HMA in this regard. This should specifically acknowledge an objective to meet the needs of family households whose needs are not being met in other parts of the HMA.</p> <p>Strong support is provided to the facilitation and support of a strong, diverse and sustainable economic base in the District as prescribed through draft strategic objective 4. The Consortium considers that the Council should acknowledge the inherent link between the delivery of new housing and the maintenance of a <i>“strong, diverse and sustainable economic base across the District, including the provision of employment land which provides a range of local job opportunities.”</i> The provision of new housing provides the opportunity to retain and attract new residents of working age who are able to contribute towards supporting the maintenance and growth of the economy and it is therefore critical that policies on both key aspects in the draft Local Plan Review are fully integrated.</p>

Respondent	Response
	<p>This will also have an important spatial dimension. The Consortium comments that attempts to focus new housing development around significant employment generating locations, such as the Colthrop Industrial Estate, provide the opportunity to support sustainable transport patterns and allow increased opportunities for residents to live close to their place of work. In addition this will protect and enhance the attractiveness of the area to employers by ensuring that their workforce requirements can be met.</p> <p>The Consortium also strongly supports the need to enhance the vitality and viability of centres in West Berkshire under draft strategic objective 5. It is readily apparent that this remains an important consideration with the Consortium noting that the regeneration of Thatcham town centre was identified as an ‘opportunity’ in the Core Strategy 2012 with that aspiration embedded within Area Delivery Plan Policy 3. Whilst the need for regeneration was clearly established in the Core Strategy in 2012 there has not been any significant progress in achieving the aspiration and regeneration of Thatcham town centre. It should therefore remain a priority for investment and regeneration.</p> <p>The vitality and viability of individual centres is fundamentally linked to their changing population and the quality of their infrastructure. This in turn is influenced by the support given to a centre’s capacity to grow in terms of its housing stock as well as its employment base. The Core Strategy directed a low level of development to Thatcham, in both proportionate (8.6% of needs) and absolute terms (900 homes or 45 homes per annum). The Consortium considers that the Local Plan Review provides an opportunity to realise and support a number of long held aspirations through the adoption of a more pro-active approach to enabling Thatcham’s future growth and regeneration.</p> <p>Directing an increased level of new housing to Thatcham would increase the resident population of the town; support a more mixed and inclusive community and therefore create opportunities to increase and capture local expenditure. In turn this will provide increased impetus for investment in Thatcham and the realisation of the town centre’s regeneration.</p> <p>The Consortium notes that draft strategic objective 10 is framed in a way which requires infrastructure needs arising from growth in West Berkshire to support and keep pace with development. The Consortium agrees with the principle of this objective but strongly suggests that the Council establishes a positive and proactive means of ensuring that this infrastructure can be provided to ensure the effectiveness of the Local Plan Review. The Consortium considers that this approach is fundamental to the achievement of sustainable development. The Consortium considers that the matter of infrastructure delivery is particularly pertinent to Thatcham where housing requirements have been constrained in recent years due to the existing education capacity at the town.</p> <p>As part of the Examination in to the Housing Site Allocations DPD, the Council produced a note titled ‘Overview of Thatcham infrastructure constraints’ which stated:</p>

Respondent	Response
	<p><i>“Thatcham has accommodated high rates of growth in recent times which has led to a substantial increase in the dwelling stock of the town in a short space of time placing high demand on infrastructure, services and facilities. <u>To address this development pressure and to address concerns raised through the consultations on both the Core Strategy and the Thatcham Vision, the focus through the Core Strategy was on regeneration to ensure that the infrastructure, services and facilities of Thatcham improve and it becomes a more self-contained market town.</u> This need was expressed very strongly in all of the consultation exercises completed during the Thatcham Vision project. The Thatcham Vision formed part of the evidence base for the Core Strategy.”</i></p> <p><i>“The Core Strategy Inspector set out in para 64 of the Inspector’s Report (CD/01/16) that ....”Whilst Thatcham is an urban area closely related to Newbury, it is reasonable for the Council to consider that it is not part of the sub-regional hub. The Council also took into account the fact that Thatcham had seen considerable housing growth in recent years. It wants the focus to be on regeneration and renewal of facilities rather than further growth. These reasons resulted in the rejection of Thatcham as a location for a strategic site and provision for only a modest proportion of the growth apportioned to all urban areas.”</i></p> <p><i>“He then went on to say in paragraph 65 that “.....the approach in the Plan is a justified local choice made by the Council.”</i></p> <p><i>“In the context of paragraphs 64 and 65, the Inspector’s comments in paragraph 67 that “In any overall review to accommodate more housing, Thatcham would be a location to be considered again.....” The Council does not disagree with this comment but without a holistic approach to planning and delivering improvements to the infrastructure, further housing development would be premature and exacerbate pressure on services and facilities.”</i></p> <p>The Consortium notes that whilst the Core Strategy restricted housing delivery at Thatcham as this would <i>“be premature and exacerbate pressure on services and facilities”</i> and put the focus on <i>“regeneration to ensure that the infrastructure, services and facilities of Thatcham improve”</i>, the Core Strategy did not set out a clear mechanism as to how those improvements would be achieved. In short, the Council identified education capacity at Thatcham as a critical issue, but the level of development planned at the town through the Core Strategy would have been unable to significantly increase capacity.</p> <p>The Local Plan Review must take a sufficiently positive view as to how infrastructure provision and the accommodation of needs can be realised in parallel. In Thatcham for example where the provision of new housing will be a pre-requisite of supporting the regeneration of the town, a strategic view must be taken of the full infrastructure needs associated with growth to ensure that they can be addressed and delivered.</p>



Respondent	Response
	<p><i>The directing of additional development towards Thatcham would enable the provision of a range of infrastructure which would serving the needs of the development, also provide opportunities for the delivery of strategic new educational facilities to address current infrastructure deficiencies and serve the existing and future community.</i></p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>No. There is a significant omission in the strategic objectives in that the one relating to housing provision (Objective 2) makes no reference to rural communities. The adopted Core Strategy has a Strategic Objective relating to this matter which states that,</p> <p><i>'To secure provision of affordable and market housing to meet local needs in both urban <b>and rural areas</b> of the District. To provide homes in a way that <b>promotes sustainable communities</b>, providing a mix of house sizes, types and tenures to meet identified needs, and respond to the changing demographic profile of the District.'</i></p> <p>Some elements of this wording are included in draft strategic objective 2, but the reference to both 'urban and rural areas of the district' and promoting 'sustainable communities' are omitted. This needs to be added in as enabling rural communities to grow and thrive should be a key objective to reflect the policy advice contained in both the current NPPF and the proposed revisions to it as set out in the response to question 1.</p>
Woolf Bond Planning for Donnington New Homes	<p>We refer to draft strategic objective no. 2 (Housing) and make the following key points:</p> <p><u>Need for Housing in West Berkshire</u> The existing Core Strategy housing requirement provides for a lower housing requirement when compared to the objectively assessed housing need figure identified in the 2016 Berkshire SHMA. We therefore suggest that it is important that this <b>Local Plan Review allocates sites of varying scales and in a mix of geographic locations</b> to enable necessary future needs to be met and in turn secure appropriate flexibility to be built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p><u>A minimum housing requirement</u> In March 2018, the Government published a draft revised NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft revised NPPF on the 5th March 2018, the Prime Minister referred to the decades of housing under delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p> <p>...</p>

Respondent	Response
	<p><b>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places.</b></p> <p><b>So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their potential. It creates and exacerbates divisions between generations and between those who own property and those who do not’.</b></p> <p>In a supporting ministerial statement, the Secretary of State (‘SoS’) for Housing, Communities and Local Government (Sajid Javid) stated:</p> <p>‘The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans’.</p> <p>Paragraph 36 of the draft NPPF goes onto state:</p> <p>‘Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</p> <ol style="list-style-type: none"> <li><b>1. Positively prepared – provides a strategy which will, as a <u>minimum</u>, meet as much as possible of the area’s objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that <u>unmet need from neighbouring areas is accommodated where it is practical to do so</u> and is consistent with achieving sustainable development;’ (Our emphasis)</b></li> </ol> <p>We recommend that the housing requirement to be met across the District is to expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement should be expressed as a minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet challenging housing targets.</p> <p><u>Meeting Unmet Needs from Adjoining Local Planning Authorities</u></p> <p>Alongside meeting its own objectively assessed housing need, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Paragraph 4.45 of the draft Reading Borough Local Plan issued for consultation in May 2017 stated:</p> <p>‘Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 943 dwellings when considered against Reading’s need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market</p>

Respondent	Response
	<p>Area. The other three authorities within the HMA recognise that there will be issues with Reading's ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up<sup>62</sup>. There will be continuing dialogue on this matter between the affected authorities which will inform the Pre-Submission Draft of the Local Plan. Where agreement is reached, it will be for individual authorities' Local Plans to specify where development will be located' (paragraph 4.4.5).</p> <p>It follows that the West Berkshire Local Plan may need to make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that its objectively assessed housing need cannot be met inside its tight administrative boundary. We also note that due to Reading Borough's tightly constrained urban nature the majority of new residential stock being permitted is for apartment led schemes. This has resulted in an imbalance in dwelling mix terms, especially when one considers that 60% of Reading's need for market housing is for 3 and 4 bedroom properties in the market sector (see Table 107 of the 2016 Berkshire SHMA)</p> <p>The above considerations place a requirement upon the District to potentially plan for a level of housing growth above West Berkshire's own need and a greater proportion of family sized residential dwellings.</p>
Woolf Bond Planning for Donnington New Homes	<p>We refer to draft strategic objective no. 2 (Housing) and make the following key points: Need for Housing in West Berkshire</p> <p>The existing Core Strategy housing requirement provides for a lower housing requirement when compared to the objectively assessed housing need figure identified in the 2016 Berkshire SHMA. We therefore suggest that it is important that this Local Plan Review allocates sites of varying scales and in a mix of geographic locations to enable necessary future needs to be met and in turn secure appropriate flexibility to be built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p>A minimum housing requirement</p> <p>In March 2018, the Government published a draft revised NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft revised NPPF on the 5th March 2018, the Prime Minister referred to the decades of housing under delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p>

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	<p>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places.</p> <p>So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their potential. It creates and exacerbates divisions between generations and between those who own property and those who do not’.</p> <p>In a supporting ministerial statement, the Secretary of State (‘SoS’) for Housing, Communities and Local Government (Sajid Javid) stated:</p> <p>‘The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans’.</p> <p>Paragraph 36 of the draft NPPF goes onto state:</p> <p>‘Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</p> <ol style="list-style-type: none"> <li>1. a) Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area’s objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;’ (Our emphasis)</li> </ol> <p>We recommend that the housing requirement to be met across the District is to expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement should be expressed as a minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet challenging housing targets.</p> <p>Meeting Unmet Needs from Adjoining Local Planning Authorities</p> <p>Alongside meeting its own objectively assessed housing need, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Paragraph 4.45 of the draft Reading Borough Local Plan issued for consultation in May 2017 stated:</p> <p>‘Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 943 dwellings when considered against Reading’s need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading’s ability to</p>

Respondent	Response
	<p>accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up. There will be continuing dialogue on this matter between the affected authorities which will inform the Pre-Submission Draft of the Local Plan. Where agreement is reached, it will be for individual authorities' Local Plans to specify where development will be located' (paragraph 4.4.5).</p> <p>It follows that the West Berkshire Local Plan may need to make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that its objectively assessed housing need cannot be met inside its tight administrative boundary. We also note that due to Reading Borough's tightly constrained urban nature the majority of new residential stock being permitted is for apartment led schemes. This has resulted in an imbalance in dwelling mix terms, especially when one considers that 60% of Reading's need for market housing is for 3 and 4 bedroom properties in the market sector (see Table 107 of the 2016 Berkshire SHMA)</p> <p>The above considerations place a requirement upon the District to potentially plan for a level of housing growth above West Berkshire's own need and a greater proportion of family sized residential dwellings.</p>
Woolf Bond Planning for JJP Land	<p>We refer to draft strategic objective no. 2 (Housing) and make the following key points:</p> <p>The Local Plan Review has been substantially delayed &amp; the associated consequences for the Council's housing land supply position</p> <p>The Council's existing spatial strategy is set out in the 2012 Core Strategy. Policy CS 1 (Delivering New Homes and Retaining the Housing Stock) of this document states:</p> <p>'An update of the Strategic Housing Market Assessment (SHMA) (so that it accords with the requirements of National Planning Policy Framework, paragraph 159) will be undertaken within 3 years of the adoption of the Core Strategy. This will be carried out in co-operation with neighbouring authorities within the Housing Market Area. If the updated SHMA indicates that housing provision within the District needs to be greater than currently planned, a review of the scale of housing provision in the Core Strategy will be undertaken' (Our emphasis).</p> <p>Despite the clear requirement for the Core Strategy housing requirement to be reviewed within 3 years of the plan's adoption in 2012 and the publication of the Berkshire Strategic Housing Market Assessment over two years ago, it is only now that the Council has progressed to the earliest possible consultation stage relating to a new Local Plan. These facts have resulted in underlying under delivery against defined subsequent objectively assessed needs for housing. In addition, it has resulted in the Council becoming subject to a housing land supply shortfall, contrary to the requirements of NPPF paragraph 47. This housing land supply deficit was confirmed at the 2017 public inquiry relating to a proposal for</p>

Respondent	Response
	<p>up to 401 no. dwellings at Land adjacent to Hilltop, Oxford Road, Donnington, Newbury (PINS Ref. APP/W0340/W/16/3143214), where the Inspector stated:</p> <p>‘On that basis, the main parties agree that a five-year supply of deliverable housing sites cannot be demonstrated. The relevant policies for the supply of housing therefore attract less weight and the National Planning Policy Framework (the Framework) paragraphs 49 and 14 are engaged<sup>18</sup>. The presumption in favour of sustainable development in paragraph 14 of the Framework is agreed to apply’ (Our emphasis) (paragraph 19).</p> <p>It follows that the Council’s continued delay in producing a new Local Plan has resulted in a ‘planning by appeal’ approach whereby sites not identified in a plan led manner have come forward to fill unmet housing need shortfalls. Given the continued delay in reviewing the Local Plan and the associated consequences of this delay (i.e. a housing land supply deficit), it follows that this Local Plan Review must proceed at the promptest possible rate and allocate sites of varying scales and in a mix of geographic locations to ensure that necessary future needs are met and appropriate flexibility is built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p>A minimum housing requirement</p> <p>In March 2018, the Government published a draft revised NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the ‘Planning for the right homes in the right places’ consultations.</p> <p>In launching the draft revised NPPF on the 5th March 2018, the Prime Minister referred to the decades of housing under delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>‘The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p> <p>...</p> <p>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places. So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their potential. It creates and exacerbates divisions between generations and between those who own property and those who do not’.</p> <p>In a supporting ministerial statement, the Secretary of State (‘SoS’) for Housing, Communities and Local Government (Sajid Javid) stated:</p>

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	<p>'The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans'. Paragraph 36 of the draft NPPF goes onto state:</p> <p>'Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p> <p>a) Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;' (Our emphasis)</p> <p>The housing requirement to be met across the District is to be clearly expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement must be expressed as an absolute minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet such challenging housing targets. Any failure to not allocate a level of growth substantially above this minimum figure would fail the positively prepared, effective and justified tests of soundness.</p> <p>Meeting Unmet Needs from Adjoining Local Planning Authorities Alongside meeting its own objectively assessed housing need, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Policy H1 of the Pre-Submission Draft Reading Borough Local Plan issued for consultation in November 2017 stated:</p> <p>'Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.'</p> <p>It follows that the West Berkshire Local Plan should make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that its objectively assessed housing need cannot be met inside its tight administrative boundary (paragraphs 4.4.3 and 4.4.4). This places a requirement upon the District to plan for a yet higher level of housing growth.</p>
WYG for Donnington New Homes	Donnington New Homes support the proposed Draft Strategic Objectives as set out at Appendix 1. We particularly welcome objective 2, which seeks to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. Objectives 8 (GI and Healthy Living), 9 (Transport) and 10 (Infrastructure) are also welcome. The

Respondent	Response
	proposals for Sandleford Park South, as described in greater detail at Appendix A and below, will help deliver these objectives through the delivery of up to 500 homes, associated infrastructure and open space.

## Summary of responses

Overall there was general agreement with the revised strategic objectives. As part of that support though there were a number of requests for the clarification of certain definitions and also suggestions for revised wording and the inclusion of specific issues. The importance of ensuring the objectives are consistent with those contained in other Council plans and strategies was stressed.

The inclusion of a vision for the Review was thought to be a useful as it would help set the objectives in context.

Several responses expressed concern that the objectives did not distinguish between urban and rural areas. It was felt that specific mention of rural communities would be helpful and would encourage the provision of housing and support economic growth in rural areas.

The need for the objectives to be written in order to deliver and manage growth over the plan period was highlighted, whether that be moving towards a low carbon economy, fostering economic growth, or the encouragement of leisure activities.

There was some discussion, particularly from the development industry about ranking of the objectives. Two developers felt that there should be a ranking of what they felt were the most valuable objectives (ie. housing, climate change and sustainable and quality development), whilst a third felt there should be ranking that is reflective of the overarching objectives of the planning system.

Finally, there was also some overlap with issues considered in more detail under other questions such as:

- the need for an appropriate evidence base particularly for economy and green infrastructure;
- the need to meet the objectively assessed need over the Western Berkshire Housing Market Area;
- the need for the allocation of development sites of varying sizes;
- the need to meet the housing needs of key workers and other particular groups;
- to consider development needs and the provision of infrastructure in parallel. There was a feeling that the pressure on existing infrastructure was being overlooked and that infrastructure identified in the Infrastructure Delivery Plan has not delivered.

The key points raised on the individual objectives can be summarised as follows:

### *Objective 1: Climate Change (7 responses)*

- The Council cannot influence climate change.



- Concerns about the deliverability of the Objective – suggested ways of overcoming this include providing more context to demonstrate how combatting climate change can be achieved (eg. combine with Objective 3).
- The Objective should seek to move to a low carbon economy rather than minimise the demand for energy which implies restricting growth.
- The Objective should be focused on growth as this is where opportunities to address climate change will be available. Reference should be made to the Local Plan being the principle document for managing and delivering growth up to 2036.
- Narrow interpretation of climate change in Appendix 2 – policies listed under Objective 3 such as CS15 will also help to mitigate against the effects of climate change.

*Objective 2: Housing* (21 responses)

- Support for the allocation of various site promoted in the call for sites held last year.
- Sites of varying scales should be allocated. Larger allocations likely to deliver towards the end of the plan period.
- Recognition required of particular groups and the different types of accommodation needed, eg. self-builders, older persons.
- Council cannot demonstrate a five year supply of housing due to delays in the review of the Local Plan.
- The housing requirement should be expressed as a minimum.
- Unmet needs of neighbouring authorities should be accommodated.
- Cross border strategic planning should only be considered if the assessed needs of neighbouring authorities cannot be met.
- Objective makes no reference to rural communities or promoting sustainable communities
- Explicitly state that that the need for new housing will be met through the allocation of new housing sites.
- The economy drives the property market.
- Clarification required on the meaning of ‘responding to the changing demographic and health profile of the district’.
- Objective should include recognition of need to achieve growth and to promote sustainable communities
- Council should acknowledge link between the delivery of new housing and the maintenance of a strong, diverse and sustainable economic base.

*Objective 3: Sustainable and Quality Development* (8 responses)

- For reasons of clarity the objective should be re-phrased to refer to ‘...while using land efficiently with higher density housing’.
- Inclusion of reference to energy efficiency.
- High density developments do not contribute to attractive, safe and accessible environments.
- Expand objective to clarify that good design is also about developments functioning well, are affordable (not overburdened by design constraints), deliverable, and can be readily be adapted to meet changing needs.

*Objective 4: Economy* (4 responses)

- The Council cannot influence this objective.
- Include references to the designation of land in accessible locations, the need to respect the local environment, and the diversification and sustainability of the rural economy.

- The reference to the provision of employment land should be expanded to include support for the effective use of the District's existing employment areas.
- The Objective should seek to foster economic growth and ensure that there is the provision of sufficient employment land to meet assessed needs.
- Greater focus required on business development so to enable the growth of existing business, new business. The Objective should therefore be re-named 'Business Development'.
- The Local Plan strategy for employment must reflect the needs of the area.
- Green Park should be recognised as a key employment area.
- Consider the use of Article 4 Directions to restrict the loss of offices to residential under permitted development.
- Consider draft policy 8 of the Minerals and Waste Preferred Options which seeks to safeguard potential, planned, and existing minerals associated infrastructure.

#### Objective 5: Town Centres (4 responses)

- The strength of the local economy is the main influence on the success of high street businesses.
- Include references to accessibility and cultural uses.
- Re-word the objective to ensure that unfriendly neighbouring development does not take place.
- The Objective should recognise that town centres should be allowed to grow, change, and include a diverse mix of uses (that include housing, offices, live/work units) that reinforces their individual sense of place.

#### Objective 6: Culture (4 responses)

- Objective difficult to achieve in a time of cuts.
- Objective should also cover facilities that contribute to cultural well-being, eg. theatres, cinemas, and pubs.
- Definition of culture required.
- Questioned why heritage referenced when it has its own Objective (7).
- Consideration of the provision of hubs for major cultural, leisure and sporting events.

#### Objective 7: Heritage (4 responses)

- Definition of heritage required.
- Questioned whether non-physical elements should also be included.
- Inclusion of reference to the significance and special interest of heritage assets.
- Consider clarifying linkages with those in the Minerals and Waste Local Plan. Both plans should be consistent in their approach to policy issues for the application of policy in decision making.

#### Objective 8: Green Infrastructure and Healthy Living (10 responses)

- Objective needs strengthening by ensuring the environment is protected and the AONB enhanced.
- Biodiversity not covered.

- Inclusion of reference to blue infrastructure.
- Recognise the needs of the equestrian industry in order to enable the equestrian economy to thrive.
- The objective should not be limited to 'sustainable communities', and should instead cover all existing and future residents regardless of whether they meet the definition of sustainability or not.
- The definition of multi-functional green space needs reviewing.
- Policy framework for supporting open spaces unclear.

#### Objective 9: Transport (4 responses)

- The Objective should be linked to other non-transport journeys that reduce the need to travel, high speed broadband and provision of local employment.
- Consider clarifying linkages with those in the Minerals and Waste Local Plan. Both plans should be consistent in their approach to policy issues for the application of policy in decision making.

#### Objective 10: Infrastructure (4 responses)

- Existing infrastructure overlooked – capacity concerns, some communities would benefit from infrastructure linked to growth, infrastructure identified in the Infrastructure Delivery Plan has not delivered.
- The Local Plan Review must consider accommodation needs and the provision of infrastructure in parallel.
- Current policy is too focused on housing and not infrastructure.

### **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The Council agrees that the inclusion of an overarching Vision would be particularly helpful and assist in setting the Strategic Objectives in context.

The general agreement amongst respondents with the draft Strategic Objectives is welcomed. It is acknowledged that they are broad and wide ranging and that is some overlap between them. In this context some definitions, such as culture and heritage, are also used in their broadest sense. The Objectives apply across the whole of the District, in both urban and rural areas. Although some respondents proposed a ranking of the Objectives the Council does not consider, in the interests of sustainable development, that would be appropriate.

Minor clarifications will be made to individual Objectives in response to some of the detailed comments made.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q3: Do you think our existing spatial strategy (as set out in the Core Strategy) is the most appropriate for development to 2036? If not please tell us why and give reasons for your answer.**

Number of responses received: 47

Respondent	Response
<b>Internal</b>	
Public Transport Team, West Berkshire Council	<p>The existing Spatial Strategy represents a good basis for development. It is important that the opportunity of reducing out-commuting and the need to travel - through the provision, development and retention of local employment opportunities in sites that are accessible by public transport, cycling and walking, and through enabling and encouraging home-working – remains at the forefront in determining proposals for development.</p> <p>It is equally important that any extensions to or infill development within, established urban areas, rural service centres and service villages (as identified in the District Settlement Hierarchy and reflected in Area Delivery Plan Policy 1) are appropriately and sensitively integrated into those established settlements, and specifically including the construction, extension or adaptation as appropriate of sustainable transport links so as to provide logical through routes connecting the development areas without requiring substantial deviation.</p>
<b>Statutory consultees</b>	
Stratfield Mortimer Parish Council	<p>The spatial strategy seems to be just a roll forward of the existing strategy. It seems apparent, from the volume of objections to the current manifestation of the strategy, that it does not accord with the wishes of the public even if it does provide the requisite amount of development. We suggest that a different approach should at least be given serious consideration. In particular a lot of the opposition to new development seems to arise from the lack of infrastructure, of many types, that is provided. Could this not be overcome, at least in part, by the greater promotion of Garden Villages? It is our understanding that such developments are only allowed where infrastructure is part of the package.</p> <p>This also picks up on the aspects of our serious concern for the lack of an objective related to communities. There is a danger that, by simply adding development to existing communities, you alter the very nature of that community. Clearly this is most obvious when development is added to small communities. But at what stage does a rural service centre morph into a small town because of more and more development and what effect does that have on its sense of</p>

Respondent	Response
	<p>community? A well-designed Garden Village, on the other hand, could be encouraged to develop its own community ethos as it is developed.</p> <p>In essence we are suggesting a strategy which does not just take what exists at present and adds bits and pieces. Rather it takes a more holistic approach to the whole District and examines the best way forward that will meet the aspiration of current residents, while at the same time meeting the legitimate demand for new development.</p>
Aldermaston Parish Council	<p>Aldermaston Parish Council asks that you review the status of Aldermaston Village as we believe recent changes may make it unable to meet the criteria of a service village.</p> <p>These changes include reduction of the bus service and closure of the post office.</p>
Thatcham Town Council	Yes
Streatley Parish Council	<p>Streatley Parish Council believes that the existing spatial strategy set out in the current Core Strategy is still the most appropriate. It was completed after extensive research and consultations, plus inspector hearings in 2008-2012 and nothing much has changed to warrant any further extensive (and expensive) review.</p> <p>The current settlement hierarchy in particular is still very appropriate. The distinction between urban, rural service centres, service villages and other villages is clear, well understood and accepted. The Parish Council strongly believes that the current status of Streatley as a village should be maintained. Nothing has changed since the previous evaluation and consultation except perhaps that its status has further worsened by the elimination of the Thames Travel public bus service. Streatley still has no shops, no Post Office, no bank, no medical surgery and no public transport (other than volunteer transport). Most residents are obliged to travel by car for these services to neighbouring larger settlements such as Goring, Woodcote, Pangbourne or Wallingford.</p> <p>Although Goring is relatively close, it is still not possible for many residents (particularly the old and young) to walk there, and it is in a different County and Local District with different priorities and policies, and a very different historical and development background.</p> <p>Furthermore, Streatley remains a very environmentally sensitive small village within the beautiful Goring Gap area. It is within the North Downs AONB and borders another AONB. It has extensive National Trust lands which overlook the village as well as an area of Special Scientific Interest, again overlooking the village. It also has an historic and now rare village layout with green animal grazing fields bordering the High Street in the middle of the village.</p>
Holybrook Parish Council	<p>Holybrook agree that the existing spatial strategy and dividing the District into different geographical areas are the most appropriate ways to deliver the spatial strategy. However, Holybrook, alongside Tilehurst and Purley, is considered to be urban. Therefore, much of the proposed development will be concentrated in these areas.</p>
Pangbourne Parish Council	<p>The spatial strategy is sound and fit for purpose. The relatively recent development of a collaborative approach by the four West of Berkshire authorities – WBC, Reading, Wokingham and Bracknell Forest – should result in an agreed optimum locational plan for future housing and infrastructure (Spatial Planning Framework). I particularly support the following vision statement (p.2):</p>

Respondent	Response
	<p>“It is intended to develop a collaborative model for the successful delivery of high quality new and expanded communities with appropriate infrastructure rich provision that is of benefit to the existing and new residents of the area. New and expanded communities will be in locations which are less disruptive to the amenities and interests of our existing residents. They will provide a high standard of amenity and development which will give high priority to the natural environment. New transport infrastructure will be integrated and involve high levels of investment in modern public transport systems. The collaborative approach will also seek to attract ongoing funding from developers and match funding and investment from government agencies to enable the timely delivery of both development and the associated infrastructure.”</p>
Burghfield Parish Council	Yes. It worked well in relation to the current Local Plan and I see no reason to change it.
Burghfield NDP Steering Group	Yes. It worked well in relation to the current Local Plan and we see no reason to change it.
Environment Agency	<p>We are pleased to see that the existing spatial strategy in the Core Strategy document covers Green Infrastructure, biodiversity and wildlife corridors. However you will need to consider the avoidance of fluvial flood risk when considering the location of development and settlements in your spatial strategy in order to be compliant with national planning policy. Paragraph 101 of the National Planning Policy Framework (NPPF) says:</p> <p>“The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding.”</p> <p>This needs to be applied to your spatial strategy when considering the location of all new development. This includes housing, transport links, retail, hospitals, schools, offices and land safeguarded for future development.</p>
Savills for Thames Water	We have no objection to the existing special strategy.
<b>General consultation bodies</b>	
British Horse Society	It seems appropriate from an equestrian point of view.
Theatres Trust	Yes
<b>Other stakeholders</b>	
Robert Wallace	No - it's out of date - people live and travel widely across and beyond the County boundaries - the division into "Urban" and "rural" communities has all but disappeared and will be long gone by 2026
David Lister	The Spatial Strategy makes no reference to extra land for education needs. The Kennet secondary school in Thatcham is already over-subscribed and unable to serve West Thatcham. The spatial strategy must at least address the capacity needs on schools and determine whether further land is required for their extension or replacement.

Respondent	Response
William Graham	Yes
Christopher Gent	We believe that the spatial strategy is appropriate
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Graham Child	<p>Our client considers that the Core Strategy Policy ADPP1 was prepared at a time when the spatial portrait of the District may have looked different, prior to subsequent development that has taken place. Whilst the spatial strategy is therefore not disagreed with in principle, our client would highlight the need to identify the role and function of each settlement, to ensure the appropriateness of the spatial strategy. We note that the need for this information is discussed at paragraph 5.4 of the scoping report. We do not consider that sufficient evidence has been gathered to assess the baseline situation, in accordance with the Sustainability Appraisal, in order to answer this question comprehensively at the current time. In addition, we consider that the spatial strategy should also be informed by a review of the boundaries of each settlement, in order to facilitate sustainable development and ensure that the growth of Urban Areas, Rural Service Centres and Service Village is not unduly restricted during the plan period. Imperatively, as the adopted West Berkshire Core Strategy (2006-2026) notes at paragraph 4.38 <i>“The North Wessex Downs AONB covers 74% of West Berkshire...”</i>. Moreover in relation to Pangbourne the Core Strategy notes at paragraph 4.41 that:</p> <p><i>“Small scale extensions in keeping with the existing character and pattern of the development and in line with Pangbourne’s role as a rural service centre will help address issues of local housing need and provide opportunities for local people to buy a home in the village.”</i></p> <p>It is therefore clear that given the area it occupies, the AONB should be appropriately reviewed, particularly at settlement edges, to ensure that sustainable sites that do not have a detrimental impact on the wider setting of the AONB can come forward. It is further clear that the strategy has previously considered small scale extensions at Pangbourne a suitable strategy in this regard. The Council should note that this strategy was employed to deliver the Core Strategy housing requirement only, and it should therefore now be re-visited again in light of the new and increased housing need within West Berkshire. In this regard our client would highlight that their land at Pangbourne Hill straddles the development boundary of Pangbourne (Rural Service Centre) and should be considered as a suitable allocation, to contribute to the District’s housing need.</p> <p>We note that the North Wessex Downs AONB washes over Pangbourne. Consequently, we have had due regard to the test associated with paragraph 116 of the NPPF 2012. Referring to designated areas, which include Areas of Outstanding Natural Beauty, paragraph 116 states:</p> <p><b><i>“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</i></b></p> <ul style="list-style-type: none"> <li data-bbox="667 1284 1973 1342">• <b><i>The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</i></b></li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• <b><i>The cost of, and scope for developing elsewhere outside the designated area, or meeting the need for it in some other way; and</i></b></li> <li>• <b><i>Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be ”</i></b></li> </ul> <p>The definition of ‘major’ developments, for the purpose of paragraph 116, is not clearly defined, however in any event we submit that our client’s site would not be considered ‘major’ development for this test. Notwithstanding this, we have considered the associated bullet points and consider that:</p> <ol style="list-style-type: none"> <li>1. there is/will be a need for development within the District and more specifically a need for housing within Pangbourne as one of the areas for development focus;</li> <li>2. as Pangbourne is washed over by the AONB, there is no opportunity to develop in this location without developing within the designated area; and as we have demonstrated via the submitted Landscape Appraisal and associated Opportunities and Constraints Plan the development of the site will not result in any detrimental effect on the environment or landscape.</li> </ol> <p>In addition, and for clarity, we note the draft NPPF (March 2018) replicates the above wording at paragraph 170.</p>
Barton Willmore for Sulham Estate	<p>Whilst we do not disagree with the spatial strategy in principle, this should be viewed in the context of when the strategy was originally prepared and the subsequent development which has taken place that may have changed the spatial context of the District. It should also be viewed in the context of National Policy which has changed since the spatial strategy was adopted and includes the need to boost significantly the supply of housing (NPPF, Paragraph 47). The spatial strategy identifies Newbury, Thatcham and the Eastern Urban Area which includes Tilehurst, Calcot &amp; Purley on Thames as ‘Urban Areas’ which offer a wide range of services. On behalf of our client, we consider that given the sustainable nature of the existing Urban Areas, opportunities should be explored for development on sites which adjoin settlement boundaries. This should include sites which are currently within the AONB.</p> <p>With this in mind, our client’s site, Land at Hall Place Farm Tilehurst, provides the opportunity to accommodate in the region of 80 new homes within a sustainable location adjoining the Eastern Urban Area. The site has low landscape sensitivity as its landscape character is heavily influenced by its urban fringe location and the surrounding ancient woodland to the north and west which shields views of the site from the wider AONB. As such, subject to a sensitive and high-quality design and an appropriate landscaping strategy, the site presents an important opportunity to deliver sustainable development.</p> <p>We note that paragraph 115 of the NPPF attaches great weight to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty and our client is fully supportive of this position. Nevertheless, due to the overall low character sensitivity of the site, we do not consider that the delivery of this development would compromise the conservation of the landscape and scenic beauty of the wider AONB. As such, we do not consider that the allocation of this site for residential development would conflict with national policy.</p> <p>Further to Paragraph 115 of the NPPF, in relation to development within Areas of Outstanding Natural Beauty, paragraph 116 of the NPPF states the following:</p>



Respondent	Response
	<p><b>“Planning permission should be refused for major developments in designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</b></p> <ul style="list-style-type: none"> <li>• <b>The need for the development, including in terms of any national considerations, and the impact of permitting it or refusing it, upon the local economy</b></li> <li>• <b>The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way</b></li> <li>• <b>Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be ”</b></li> </ul> <p>It is important to note that we do not consider the proposed delivery of up to 80 dwellings in this location to constitute major development in the context paragraph 116 of the NPPF. This is due to the site adjoining the Reading Urban Area conurbation.</p> <p>Nevertheless, should the view be taken that the proposal would constitute a major application in the context of paragraph 116 of the NPPF, we consider that the site can meet the assessment set out in the bullet points above. Firstly, in relation to need, there is a recognition at National Policy level of the need to deliver more housing, particularly in the south east and particularly in sustainable locations. As such, there is a clear need for this development to come forward.</p> <p>Secondly, in relation to delivering elsewhere outside of the designated area, we note that the Council’s existing spatial strategy directs development towards the Eastern Urban Area. It is noted that there are increasingly limited opportunities to deliver within the Eastern Urban Area due to previous development and existing allocations. It is also noted that 74% of the borough is covered by the AONB. As such, in informing their emerging spatial strategy, the Council need to look at the opportunity to deliver housing development in sustainable locations which directly adjoin the settlement and are well related to existing infrastructure and services.</p> <p>Thirdly, in relation to a detrimental effect on the landscape, as set out within the Landscape Capacity Assessment which accompanies these representations, overall the site has low landscape sensitivity and the potential to accommodate residential development due to urbanising features including the settlement edge and existing built form within the site.</p>
Bewley Homes	<p>We do not agree that the Spatial Strategy should be based on the four spatial areas. It applies generalisations to areas without considering the role and function of individual settlements and their ability to accommodate growth.</p> <p>In the current Local Plan the East Kennet Valley area was allocated relatively low growth to reflect the more limited services and poorer transport links. In the example of Woolhampton which falls within this area, it is considered that an assessment of its characteristics and services would demonstrate that it is a location that could accommodate growth.</p> <p>Further consideration should be given to the individual character, facilities and transport connectivity of settlements and their ability to deliver more growth. This is explained in more detail in Question 4.</p>
Boyer Planning for Spitfire Bespoke Homes	<p>The Council’s current spatial strategy (to 2026) as set out in the Core Strategy Policy ADPP1 provides a settlement hierarchy for West Berkshire, having regard to the role and function of the settlement. As a small village, Beenham is not included in the current settlement hierarchy.</p>

Respondent	Response
	<p>Spitfire are concerned that it is the Council's intention to continue to adopt this approach to 2036 by building on the existing settlement pattern and use of a hierarchy of settlements as the focus for development.</p> <p>Spitfire support the Council's intention to re-examine the current role and function of each of the individual settlements, although a review of Beenham, which offers limited services, is unlikely to be ranked in the revised settlement hierarchy. Spitfire consider that it is essential that the future sustainability of each settlement is considered as part of the settlement hierarchy review. For smaller settlements, like Beenham, which have limited facilities, without some housing growth to support improved and new social and community infrastructure, the smaller villages will continue to suffer and any remaining community infrastructure (like Beenham Primary School) will be at risk of closure.</p> <p>As such, it is essential that West Berkshire plan for housing growth in smaller villages like Beenham to improve the sustainability of the village for the future.</p> <p>Allowing further growth in smaller villages like Beenham is consistent with paragraph 80 of the draft NPPF which highlights the importance of plans needing to identify opportunities for villages to grow:</p> <p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p> <p>For the above reasons, Spitfire suggest that a sustainable residential extension of Beenham, including 3.19ha of land to the south of Back Lane should be identified in the emerging Local Plan. The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan.</p>
Mark Carter for Mr R.L.A. Jones	<p>The Respondent considers that the existing spatial strategy is the most appropriate for the District.</p> <p>In particular re affirmation that Lambourn is a "rural service centre" that can accommodate further (housing) development including the Respondent's site previously identified as LAM007 "land between Folly Road, Rockfel Road and Stork House Drive, Lambourn".</p> <p>Lambourn still has a range of services and reasonable public transport provision which also serve the requirements of surrounding communities and these should be reinforced.</p> <p>Although there is much discussion about the role of surrounding Districts in meeting housing need these Districts are already heavily constrained and are unlikely to contribute. West Berkshire should be looking to meet its own (housing) needs within its boundaries.</p>
Carter Jonas for Hermitage Farms	<p>The NPPF sets out a presumption in favour of sustainable development. Whilst it is accepted that the larger settlements and growth areas such as Newbury will receive the majority of the forecasted growth, the Local Plan Review should seek to allow more housing and employment opportunities on the edge of smaller settlements in West Berkshire, on a proportionate basis, to promote the rural economy and to ensure the local services and facilities are maintained and to improve levels of affordability in rural areas.</p> <p>There are sustainable settlements located in West Berkshire which are not constrained by planning restrictions such as Green Belt and environmental constraints such as areas prone to flooding. Furthermore, smaller sustainable settlements</p>

Respondent	Response
	<p>such as Hermitage contain local facilities. To support these existing services and facilities and to improve the availability of affordable housing provision of new homes is needed in smaller settlements.</p> <p>Hermitage is considered to be a highly sustainable location for new residential and employment development. It would be able to connect into existing infrastructure and would make a significant contribution to the viability and vitality of Hermitage.</p> <p>The sites are either immediately adjacent to or in close proximity to Hermitage. Hermitage benefits from a range of services including a primary school, two public houses, general store and post office, garden centre and a number of light industrial units. The village has a good vehicle access to the M4 motorway and the A34 and there is a regular bus services into Newbury. Appropriate design and landscaping would ensure that development is physically and visually well contained and does not adversely affect the character and appearance of the AONB. There are no known constraints which would impact on the availability, suitability or achievability of development of the sites.</p> <p>Hermitage Farms would encourage amendments to the current spatial strategy to allow for more flexibility in delivering new homes and employment sites in some of the more sustainable villages which have a wide range of local shops, services and community facilities, which are not constrained by environmental or landscape designations and where deliverable sites exist adjacent to the village, such as at Hermitage.</p> <p>This strategy would make a significant contribution to housing and employment needs within West Berkshire. New housing development would ensure that sites are allocated which can contribute to the five year housing land supply. Hermitage Farms note that a significant proportion of the planned housing will be delivered on strategic sites. Large strategic sites and new settlements (such as the one being promoted at Grazeley) will require significant infrastructure provision before any homes can be built. This strategy should be balanced with a strategy which allocates smaller sites adjacent to villages. Sites such as those identified within Appendix 1 &amp; 2 require much less investment in infrastructure and can be bought forward quickly and easily, contributing to and sustaining the Councils five year housing land supply.</p>
The Chilton Estate	<p><u>Rural Service Centres and Villages</u></p> <p>The policies of the Plan should reflect the need to keep these settlements alive and thriving by encouraging small scale development in villages and larger ones of up to 100 dwellings in Rural Service Centres where people wish to live and where young people are being priced out of the market.</p>
Fisher German LLP for Mr Musgrave and Begley	<p>The existing spatial strategy is not considered to be the most appropriate strategy.</p> <p>Agree to a certain extent, that most development will be within or adjacent to the settlements included in the settlement hierarchy, and related to the transport accessibility of the settlements, their level of services and the availability of suitable sites for development.</p> <p>However, whilst it is laudable to aim for the majority of development to take place on previously developed land it is inevitable that green field land will be required to meet the increasing housing needs. As such it is considered that the statement should be omitted given it is unlikely to be met.</p>

Respondent	Response
	<p>The Strategy focusses most development to the urban areas. Clearly some of the most suitable locations for development will be in accessible locations in and around the urban area, however development, particularly affordable housing, the provision of jobs, social and community facilities is required to help sustain, enhance and make both the area's towns and villages more self-supporting places to live and work.</p> <p>The Council should recognise that some villages have experienced the loss of vital services such as shops and pubs in recent years and that changing the current strategy of relative restraint in the rural area could increase the population and change the age profile of rural villages.</p> <p>It should also be acknowledged that an increase in activity and spending power would support existing vulnerable village services and facilities, possibly leading to new provision. In addition, a range of development sizes in the rural villages would be likely to bring with them a range of types and sizes of housing, which would provide more choice for existing residents wanting to stay within a village but down-size.</p> <p>As such rural service centres and service villages have a role to play in accommodating growth which can play a role in enhancing or maintaining the vitality of villages.</p> <p>The above is even more important to consider when the OAN for West Berkshire has been increased from 525 dpa to 665 dpa, an increase of 140dpa. The rural areas have capacity in a number of the settlements to accommodate these increases.</p> <p>In addition, it is clear that the neighbouring authority of Reading Borough Council is unable to meet its own housing need. The West of Berkshire Spatial Planning Framework, states that: <b><i>“This will help meet needs across the Western Berkshire HMA, helping to deliver housing for areas which can't meet all of their needs within their own boundaries. In particular it is already clear that Reading with its tight urban boundaries will find it difficult to accommodate its Objectively Assessed Need (OAN) for housing identified in the SHMAA.”</i></b></p> <p>At this stage it is understood that West Berkshire, Wokingham and Bracknell Forest Council's will need to accommodate approximately 1,000 homes of Reading's unmet needs. The initial response from West Berkshire however has been dismissive of this stating it is too early in the Plan making process itself to understand if it can accommodate this unmet need, however a Memorandum of Understanding signed by the four Western Berkshire HMA authorities that Reading's unmet need will be accommodated in the HMA. The breakdown of where this should be met within the HMA is not identified, but it is anticipated that West Berkshire, as the much larger of the authorities, will need to accommodate much of this.</p> <p>It is therefore even more imperative that the new spatial strategy considers the suitability of each of the settlements in the District for growth, including the rural areas, as these are areas that are able to proportionately grow and enhance their services and facilities without adversely impacting on them.</p>
Gladman Developments	<p>A range of spatial strategy options will need to be tested as part of the preparation of the new Local Plan for West Berkshire. The existing Core Strategy advocates an approach that seeks to direct development based on the existing settlement pattern, focussing growth in areas depending on their role and function within the settlement hierarchy. Gladman are of the view that development should continue to be directed in accordance with a settlement hierarchy,</p>

Respondent	Response
	<p>ensuring that meaningful levels of growth are planned to enable and support the sustainability of a wide range of communities and settlements. The Council's evidence base will need to carefully consider the needs of settlements and communities across the District in setting a strategy that supports the current and future needs of communities whilst fully realising the areas sustainable economic growth potential. Gladman therefore welcome the Council's intention to reexamine the current role and function of all individual settlements across the District as part of the process of reviewing the Local Plan.</p>
Hallam Land Management	<p>Whilst the current settlement hierarchy continues to be relevant, there is no flexibility in the current strategy for development opportunities beyond urban extensions and infill. The inflexibility of this approach is neither justified or practical if the Council is genuinely committed to delivering the most sustainable pattern of growth within the District and it is imperative therefore that the strategy also accommodates the opportunity to consider the potential for a new settlement proposal and specifically the new community proposals south of Reading.</p>
Nexus Planning for Pangbourne Beaver Properties Ltd	<p>The Scoping Report notes that Core Strategy Policy ADPP1 sets out the current spatial strategy for delivery of growth within West Berkshire, seeking to strike a balance between:  “protection of the District’s environmental assets and improving the quality of life for all, ensuring that necessary change and development is sustainable in the interests of future generations”.</p> <p>That strategy adopts a hierarchy of settlements that states:  “Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below, and related to the transport accessibility of the settlements (especially by public transport, cycling and walking) their level of services and the availability of suitable sites for development. The majority of development will take place on previously developed land.”</p> <p>The Council suggests in the Scoping Report that the emerging Local Plan would continue to build on the existing settlement pattern, using the hierarchy of settlements as the focus for development. PBP Ltd broadly support this approach.</p> <p>It goes on to suggest that the current role and function of all individual settlements would be re- examined to ensure the settlements identified in each category remain the most appropriate.</p> <p>The policy designates Pangbourne as a Rural Service Centre, along with Burghfield Common, Hungerford, Lambourn, Mortimer, and Theale. Of these six villages only four (Hungerford, Pangbourne, Mortimer and Theale) benefit from a railway station. Given the increasing importance of the railway system and proximity to railway stations for future sustainable transport it is considered that the status of these four settlements that have a railway station should be elevated by designating them as <u>Principle Rural Service Centres</u>. This designation should then facilitate policies that would allow for appropriate amounts of housing to be directed to these villages.</p>
Nexus Planning for Croudace Homes	<p>The Scoping Report notes that Core Strategy Policy ADPP1 sets out the current spatial strategy for delivery of growth within West Berkshire, seeking to strike a balance between:  “protection of the District’s environmental assets and improving the quality of life for all, ensuring that necessary change</p>

Respondent	Response
	<p>and development is sustainable in the interests of future generations”.</p> <p>As part of that strategy a hierarchy of settlements has been outlined which includes Thattham as one of three ‘Urban Areas’ in the top tier of the hierarchy, along with Newbury, and the Eastern Urban Area (Tilehurst, Calcot &amp; Purley on Thames). This, the Council suggests, allows urban development to be maximised and a combination of strategic urban extensions and smaller sites for housing to be identified.</p> <p>It is the opinion of Croudace Homes that ADDP1, in so far as it relates to the broad distribution and location of new housing, shows a high degree of consistency with the relevant policies of the Framework. In particular, Croudace Homes fully supports the identification of Thattham as an ‘Urban Area’ in the top tier of the settlement hierarchy reflecting its status as one of the most sustainable settlements in the District to accommodate strategic levels of housing growth.</p> <p>The Council suggests in the Scoping Report that the emerging Local Plan would continue to build on the existing settlement pattern, using the hierarchy of settlements as the focus for development. Croudace Homes therefore supports this approach. It goes on to suggest that the current role and function of all individual settlements would be re-examined to ensure the settlements identified in each category remain the most appropriate.</p> <p>In that context, the Council will be aware that Thattham is allocated for growth of around 900 dwellings under Policy ADPP3 of the Core Strategy, compared to approximately 1,400 dwellings in the Eastern Urban Area (ADPP4) and 5,400 dwellings at Newbury (ADPP2). The Core Strategy Inspector provides useful guidance in terms of the growth potential at Thattham when he states that:</p> <p>“65. The Council’s focus on Newbury and the modest level of provision made at Thattham is not the only approach that could have been pursued. Additional development at Thattham might be able to contribute to some of the infrastructure improvements and other changes the Council seeks. In the light of the planned review of housing provision, the approach to Thattham may need to be reviewed if additional housing has to be accommodated in the District”.</p> <p>66. The Council accepts that the policy for Thattham should acknowledge that the delivery of planned provision will include greenfield sites adjoining the settlement. This is necessary for effectiveness in subsequent delivery. The Council also accepted that one consequence of the policy for Thattham is that, compared with Newbury, local needs will be addressed far less effectively...”</p> <p>4.6 In formulating the Core Strategy spatial policies, the level of growth at Thattham was debated. The Council’s policy for relatively modest growth, despite its Main Urban Area status, was influenced by the fact that Thattham had seen considerable growth in recent years, with the focus being on regeneration and renewal. The Core Strategy Inspector concluded that:</p> <p>“65.... For the present, the approach in the Plan is a justified local choice made by the Council.</p> <p>67. In any overall review to accommodate more housing, Thattham would be a location to be considered again for additional housing, consistent with its position at the top tier of the settlement hierarchy”.</p> <p>The policy position at Thattham at that time was not based upon a definitive infrastructure constraint; it was based upon a ‘local choice’ with the Inspector acknowledging that another strategy for higher growth at Thattham would have, and indeed may be equally appropriate.</p>

Respondent	Response
	<p>It should also be noted that this policy position was established when preparing the Core Strategy in 2009/2010. Nearly a decade has elapsed since the decision was made to give Thatcham a period of consolidation. In that time, Thatcham has seen very modest levels of housing growth, indeed the HSA DPD includes only a single allocation at Thatcham - land at Lower Way, allocated for approximately 85 dwellings.</p> <p>The level of growth at Thatcham is in stark contrast to the other settlements within the top tier of the settlement hierarchy where growth has been substantial. A contrast which is even more stark when the approved development for up to 400 dwellings on Land adjacent to Hilltop, Oxford Road, Donnington, Newbury (APP/W0340/W/16/3143214) is taken into account.</p> <p>Given its position in the settlement hierarchy, its high level of sustainability, the lack of growth over the life of the Core Strategy and comments made by the Appeal Inspector, it is clear that that Thatcham should be expected to accommodate a substantial level of growth within the emerging local Plan. With limited capacity with settlement boundaries (as evidenced through the HSA DPD), this must include sustainable greenfield sites on the edge of the settlement. In that regard, it should be noted that there are no technical issues that would preclude growth at Henwick Park and Croudace Homes consider that it should be allocated for development comprising at least 225 dwellings in the emerging Plan to help meet development needs.</p>
Origin3 Ltd for Sandtrend Ltd	<p>We support the Council's strategy to deliver housing through a combination of strategic urban extensions and smaller sites, which should be identified within a housing trajectory through this LPR process.</p> <p>The adopted Core Strategy spatial strategy applies a three tier settlement hierarchy prioritising and directing growth to Urban Areas (Newbury, Thatcham and the Eastern Urban Area). Rural Service Centres and Service Villages are identified as the next two tiers to accommodate a lesser level of growth commensurate to the scale of the towns and villages.</p> <p>We support the principle of the existing spatial strategy in directing growth to key Urban Areas as they are generally the most sustainable locations to locate new housing, close to existing services, facilities and transport hubs.</p> <p>Newbury is the largest town in West Berkshire with a wide range of employment opportunities, services and facilities. The recent electrification of the rail line between Newbury and Reading will further facilitate faster, direct connectivity to Reading. Newbury therefore remains the most suitable location to direct new growth in West Berkshire.</p> <p>Shaw-cum-Donnington is located immediately north of Newbury and the built environment and road connections are contiguous with Newbury. It therefore forms part of the wider urban area. This should be clarified within the settlement hierarchy, particularly so in light of the recent grant of planning permission at appeal for 401 dwellings at Hilltop in March 2017, directing growth to the north of the town towards Donnington (Application Ref. 14/02480/OUTMAJ).</p> <p>We support the Council's objective to deliver new housing through a combination of urban development, strategic urban extensions and smaller sites to ensure a balanced delivery across the plan period.</p> <p>The existing spatial strategy puts a lot of reliance on delivery at two key strategic sites in Newbury at Sandleford Park (2,000 dwellings) and Newbury Racecourse (1,500 dwellings). Sandleford Park in particular has not delivered at</p>

Respondent	Response
	<p>anticipated rates to date which was a contributing factor to West Berkshire recently being unable to demonstrate a five year supply of deliverable housing sites.</p> <p>Strategic sites can deliver significant benefits in terms of mixed-use development land and infrastructure however they inevitably take significantly longer to come forward. It is understood that the existing Core Strategy housing allocation at Sandleford Park will realistically be developed towards the latter part of the plan period. Opportunities for a new strategic development at Grazely would be of a similar timeframe, if not longer.</p> <p>It is therefore key that the LPR identifies a balanced mix of housing sites to meet OAHN across the plan period particular for years 0-5 and years 6-10, as required by the NPPF.</p> <p>We support the Council's objective to maximise urban development where possible however point out that many of these opportunities have been explored at length through the Core Strategy and Site Allocations Development Plan Documents (DPDs) meaning development at Greenfield sites on the edge of settlements will inevitably be required in the right locations to balance supply.</p> <p>Urban extensions provide one of the most sustainable and appropriate ways of delivering housing, being able to provide a range of housing and crucially, being able to meet local affordable housing need. They allow new homes to be provided in the most appropriate locations taking into account housing need and connectivity (in locations that do not exacerbate existing congested routes), as well as being able to provide significant contributions towards local infrastructure.</p>
Pegasus Planning Group Ltd for Donnington New Homes (re. Long Lane, Newbury)	<p>Yes – the gradual expansion of existing towns and villages through the allocation of appropriately sized sites adjacent to the settlement boundaries is the most appropriate strategy for development to 2036. This strategy is the most appropriate for a number of reasons. Developing new homes on the edges of existing settlements means that existing infrastructure can be utilised and improved. Roads, schools, hospitals/surgery's, shops and other infrastructure already exist, and new development can contribute towards this infrastructure through developer contributions, providing benefits for existing and new residents alike.</p> <p>The prior existence of infrastructure, means that such developments can be built out much more quickly than larger, strategic sites. These strategic sites will require infrastructure to be built from the ground up, which takes time and may delay housing delivery. This means that they contribute towards increasing housing land supply in the short term, alleviating immediate pent-up housing need.</p>
Pegasus Planning Group Ltd for Donnington New Homes (re. Smitham Bridge, Hungerford)	<p>Yes – the gradual expansion of existing towns and villages through the allocation of appropriately sized sites adjacent to the settlement boundaries is the most appropriate strategy for development to 2036. This strategy is the most appropriate for a number of reasons. Developing new homes on the edges of existing settlements means that existing infrastructure can be utilised and improved. Roads, schools, hospitals/surgery's, shops and other infrastructure already exist, and new development can contribute towards this infrastructure through developer contributions, providing benefits for existing and new residents alike.</p> <p>The prior existence of infrastructure, means that such developments can be built out much more quickly than larger, strategic sites. These strategic sites will require infrastructure to be built from the ground up, which takes time and may</p>



Respondent	Response
	delay housing delivery. This means that they contribute towards increasing housing land supply in the short term, alleviating immediate pent-up housing need.
Pro Vision for Rootes Trustees	<p>Generally, yes. A spatial strategy based on supporting the existing settlement hierarchy will continue to promote a sustainable pattern of growth. In the context of West Berkshire, it is demonstrably the best way to meet the three overarching planning objectives - the economic objective, the social objective and the environmental objective. The existing hierarchy does however need to be reviewed. We would, for example question the capacity of the Eastern Urban Area to continue to be a focus for further growth.</p> <p>The existing spatial strategy provides an appropriate framework for identifying opportunities for villages to grow to help support local services and facilities (in accordance with Paragraph 80 of the draft NPPF) and to identify an appropriate supply of small sites.</p> <p>It follows that we can see no justification for considering an alternative spatial strategy that concentrates a substantial proportion of the District's housing growth in a new settlement.</p>
Pro Vision for Cala Group Ltd and Wates Developments Ltd	<p>Generally, yes. A spatial strategy based on supporting the existing settlement hierarchy will continue to promote a sustainable pattern of growth. In the context of West Berkshire, it is demonstrably the best way to meet the three overarching planning objectives - the economic objective, the social objective and the environmental objective. The existing hierarchy does however need to be reviewed. We would, for example question the capacity of the Eastern Urban Area to continue to be a focus for further growth.</p> <p>Hungerford has a range of facilities and services, meeting the requirements of both the rural hinterland and the wider area. It has one of only two town centres identified in West Berkshire's adopted Core Strategy, reflecting the range of facilities and services it provides for the surrounding area. Therefore, the settlement should be elevated in the hierarchy and categorised as an Urban Area where development will be focussed, rather than as a Rural Service Centre.</p> <p>The existing spatial strategy provides an appropriate framework for identifying opportunities for villages to grow to help support local services and facilities (in accordance with Paragraph 80 of the draft NPPF) and to identify an appropriate supply of small sites.</p> <p>It follows that we can see no justification for considering an alternative spatial strategy that concentrates a substantial proportion of the District's housing growth in a new settlement.</p>
Pro Vision for Rivar	<p>Generally, yes. A spatial strategy based on supporting the existing settlement hierarchy will continue to promote a sustainable pattern of growth. In the context of West Berkshire, it is demonstrably the best way to meet the three overarching planning objectives - the economic objective, the social objective and the environmental objective. The existing hierarchy does however need to be reviewed. We would, for example question the capacity of the Eastern Urban Area to continue to be a focus for further growth.</p> <p>The existing spatial strategy provides an appropriate framework for identifying opportunities for villages to grow to help support local services and facilities (in accordance with Paragraph 80 of the draft NPPF) and to identify an appropriate supply of small sites.</p>

Respondent	Response
	It follows, that we can see no justification for considering an alternative spatial strategy that concentrates a substantial proportion of the District's housing growth in a new settlement.
Savills for Englefield Estate	<p>We have no specific comment on the current spatial strategy and the settlement hierarchy upon which this is based. However, we note that there is an opportunity to consider strategic growth, in the form of a new settlement, which would not conform to the current spatial strategy. This spatial strategy therefore needs to be amended to allow for this (see response to Question 5). However, even if the new Local Plan were to support the development of a new settlement, this would not negate the need for appropriate and sustainable new development at the existing settlements in the District, in accordance with the existing spatial strategy. As such a continuation of the existing spatial strategy, based upon the settlement hierarchy set out in Core Strategy policy ADPP1, is supported. Notwithstanding this, the spatial strategy should include provision for a sustainable level of development in rural areas where this would support an economically, social and environmentally strong countryside in line with our response to Q2.</p> <p>It should also be noted that the Local Plan Review will need to take account of emerging national guidance (the Revised NPPF) and that this may have implications for the spatial strategy – e.g. 'entry level exception sites' in rural areas.</p>
Joy Schlaudraff	<p>In the main, yes. Nothing else would work, in general. But for smaller sites, NO. These should be allowed wherever they fit – because they are small!</p>
Turley for A2dominion Housing Group	<p>We agree that the Local Plan Review should direct the majority of development to settlements at the higher end of the settlement hierarchy. However, given the scale of need to 2036, we consider that opportunities should be explored at other settlements, commensurate with their scale. Such a solution may provide opportunities to meet a specific need in an area, address local affordability issues or help to maintain the vitality of the settlement.</p> <p>Furthermore, in relation to Streatley, A2Dominion consider that the Local Plan Review should be prepared on an understanding of the true sustainability of the existing settlement. In this regard, we note that the proximity of some settlements in West Berkshire to settlements within neighbouring authorities, such as Streatley (West Berkshire Council) has implications for the accessibility of those settlements to local facilities. For example, we note that Streatley shares facilities with Goring (in South Oxfordshire District) and that the two are functionally and operationally related. Goring and Streatley are positioned on the Oxfordshire - Berkshire border albeit in the main (apart from in planning terms) they are considered as a single identity. This is most apparent through the Goring and Streatley railway station providing train services between Reading and Oxford and we understand that Streatley provides allotment provision for residents of Goring as the need arises. Facilities in Goring are easily accessible from Streatley.</p> <p>Goring is located 300m to the east of Streatley and easily accessible on foot where a significant number of local facilities are provided and which benefit the existing residents of Streatley, with the two settlements operating interdependently. For context within the South Oxfordshire Core Strategy (2012), Goring is identified as a larger village (Policy CSS1) - a second tier settlement within the hierarchy and therefore acknowledged to be a sustainable location for development. The Settlement Assessment Background Paper (March 2011) identifies the following facilities within Goring: primary school,</p>

Respondent	Response
	<p>doctors, dentist, public park, village hall, 5 + retail shops, pub, bar, pharmacy, Post Office, frequent bus services, railway station providing services between Oxford and Reading.</p> <p>The emerging SODC Local Plan continues to maintain that Goring is a larger village.</p> <p>Core Strategy policy ADDP1</p> <p>With regard to WBC, the settlement hierarchy for the adopted Development Plan is set out at ADDP1. Streatley is not identified as an Urban Area, Rural Service Centre or Service Village. Instead, Streatley is a smaller village with a settlement boundary and defined by Policy ADPP1 as a location where only infill development is considered appropriate. We do not support this position given the proximity of Streatley to a range of local facilities.</p> <p>The Settlement Hierarchy (2012) sets out that Streatley was considered as part of the initial settlement hierarchy study from 2008 and was assessed as a rural settlement given it was assessed as having '7 or more local facilities/ services'. As part of the 2012 assessment, a re-assessment of the settlements within the District was undertaken to reflect comments on the methodology. One such comment raised by the West Berkshire LDF Working Group considered the proximity to settlements such as Tadley and Goring (page 11), which is relevant to our comments relating to the settlement of Streatley. The assessment concluded the following:</p> <p>"Consideration of proximity to Goring and Tadley:</p> <p>There were comments received that there should be more consideration of cross border interaction, particularly the effects that Reading, Goring and Tadley have on settlements in West Berkshire. Previously in this report account has been taken of proximity by road to Newbury and Reading. The result being that some settlements received minor scores while most did not receive any additional points. Close proximity to the towns of Goring and Tadley, located outside the District boundaries, would be beneficial to those settlements located in the north east and south east of the District and in very close proximity to Goring or Tadley, yet it is considered that these towns are not significant enough to have any major impacts on the majority of settlements in the District."</p> <p>Given the continued identification of Goring with the SODC adopted and emerging Local Plans as a larger village where new development is considered appropriate given the sustainability of the settlement, and the relationship that this has with Streatley, we consider that it is essential for the West Berkshire settlement hierarchy to have regard to the presence of these nearby services. The 2012 Assessment did not consider the interrelationship between Goring and Streatley and in our view that would have resulted in Streatley being given a significantly higher settlement score than was recorded within the Assessment.</p> <p>By way of an example, Streatley scored O against distance with only Reading or Newbury (major urban areas) being considered as providing higher order goods. Whilst this is not directly comparable to Goring, Goring itself does provide a range of facilities within a short distance of Streatley that improve its sustainability with the facilities benefitting residents of Streatley (i.e. the supermarket and station) resulting in a lower requirement to travel further afield by car than other identified service villages or rural service centre identified within ADDP1. This is equally applicable to cycling opportunities where the assessment considered cycle routes and proximity to facilities. Streatley itself is on a cycle route with facilities within Goring accessible on foot or via cycle within 300m. Significant weight should also be attached to the proximity of Streatley to Goring station. This should be considered as part of any updated spatial strategy.</p>

Respondent	Response
	<p>Streatley delivers a number of local facilities which when considered in combination with Goring, the settlement benefits from a range of local facilities which are within walking distance of the settlement (albeit within two different local authority areas). On this basis, we consider that Streatley should be considered at least a service village when assessed against the Core Strategy settlement hierarchy, but with characteristics of a Rural Service Centre. This is reflective of the positioning of Goring with the SODC settlement hierarchy as a larger village.</p> <p>Given the opportunities are being considered elsewhere (as cited at paragraph 5.8 of the Scoping Report) on account of the requirements by the Framework for 'potential cross boundary joint working opportunities' (paragraph 157 of the Framework), this is equally applicable Streatley which should be more robustly considered through the emerging evidence base to the Local Plan Review.</p>
Turley for North East Thatcham Consortium	<p>The existing spatial strategy set out in section 4 of the Core Strategy acknowledges that <b>“Not all development can be accommodated within the District’s urban areas”</b>. The Consortium considers that will remain the case and as such it is essential that the spatial strategy for the Local Plan Review acknowledges this and provides the ability for development to be delivered outside of existing urban areas.</p> <p>The Consortium agrees that the spatial strategy should be underpinned by a settlement hierarchy based upon the existing and future role and function of settlements within West Berkshire. The Consortium considers that the majority of growth should take place at (within and adjacent to) the urban areas at the higher end of the hierarchy.</p> <p>On that basis, the Consortium agrees that most development will take place in Newbury, Thatcham and in the settlements in the east of the District close to Reading.</p> <p>The Consortium considers that the access to services and facilities of these areas and the opportunities they provide to reduce out-commuting and the need to travel is an appropriate basis to support the spatial strategy. It is equally apparent that the support for higher levels of provision within these larger settlements will be critical in supporting the delivery of infrastructure needs (physical and social) which are of significant importance in ensuring that these urban areas remain vital and viable.</p> <p>It is apparent that over the Core Strategy period the urban areas have been contributing a proportionately significant level of housing provision, in accordance with the existing spatial strategy. Thatcham, for example, has broadly delivered against the requirement set through the Core Strategy with provision only 20 dwellings lower than the requirement over the last nine years for which monitoring data is available (2008/09 – 2016/17). As referenced in the preceding question, however, the level of housing provision directed at Thatcham when compared to Newbury for example, was notably and deliberately modest.</p> <p>Whilst this was at least in part justified on the basis of the level of development previously seen in Thatcham it is evident that over the Core Strategy period the policies restricting development at the town means that it is no longer the context against which the Local Plan Review is based.</p> <p>The Council’s latest evidence of housing need (SHMA 2016) confirms that there will need to be a boosting of supply from the levels which have been provided over the Core Strategy plan period to date (500 homes per annum; 2006 – 2017). Following the existing spatial strategy the urban areas at the top of the hierarchy will need to individually and collectively</p>

Respondent	Response
	<p>elevate the levels of homes being delivered to ensure housing needs are met sustainably. It is noted that the in the Inspector's Report on the Core Strategy, the Inspector specifically referenced that: <b><i>“Additional development at Thatcham might be able to contribute to some of the infrastructure improvements and other changes the Council seeks. In the light of the planned review of housing provision, the approach to Thatcham may need to be reviewed if additional housing has to be accommodated in the District.”</i></b></p> <p>The Core Strategy spatial strategy included a specific section on Thatcham. This recognised its identification as one of the four urban areas and the specific issues facing the town. The Consortium agrees that support should continue to be given to the aspiration of regenerating Thatcham town centre. This continues to be important both in terms of its role in serving its local population but also the surrounding rural areas and in recognition of the fact that there has been limited progress in this regard over the Core Strategy period to date.</p> <p>In addition, the Consortium also supports the continuation of a strategy which seeks to see Thatcham becoming a more self-contained settlement which provides a more range of job opportunities and encouraging residents to shop and socialise locally. The Consortium considers that the delivery of new infrastructure at Thatcham will be fundamental to the achievement of this objective to ensure that the needs of current and future generations of residents are met. This is particularly the case given the Council's acknowledgement of the education capacity issues at Thatcham.</p> <p>Whilst this vision for Thatcham is supported, it is apparent that the approach taken in the Core Strategy to essentially restrain growth through the limited provision of housing has inhibited its realisation. The Consortium considers that the Core Strategy spatial strategy and approach to Thatcham was one of restraint, reflecting the Council's concerns regarding infrastructure capacity at the town and a perception that it had seen considerable housing growth in recent years. In accordance with the Core Strategy the scale of development in the town has been modest. The Council has, however, acknowledged the sustained need to address infrastructure shortcomings, particularly in relation to education. In establishing a new spatial strategy for the District, the Consortium therefore considers that this should be underpinned by the aspiration of addressing the infrastructure issues at Thatcham and providing a situation whereby the opportunities to regenerate the town centre are maximised. The town is also well-placed to build upon its existing role as a key commercial centre, both as a localised office market and a more prominent strategic industrial location. The latter has been supported by the more recent development of modern, better quality industrial space, as acknowledged within the Council's economic evidence.</p> <p>The Core Strategy spatial strategy also acknowledged the high quality environment. The Consortium considers that this should also inform the spatial strategy for the Local Plan Review, particularly in relation to the large amount of the District which falls within the North Wessex Downs Area of Outstanding Natural Beauty.</p> <p>The Core Strategy spatial strategy set out in Area Delivery Policy 1 indicated that <b><i>“The majority of development will take place on previously developed land”</i></b>. The Council will need to consider whether such opportunities exist in order to inform the Local Plan Review and even if such sites are available, it will be necessary for the Council to consider in a holistic manner whether they would be the most appropriate solution to achieve sustainable development. Alternative solutions may provide the opportunities for large scale development whilst delivering significant levels of new infrastructure.</p>

Respondent	Response
	<p>The Core Strategy spatial strategy acknowledged the presence of the AWE facilities at Aldermaston and Burghfield. The Consortium considers that it is essential that this also informs the strategy for the Local Plan Review and the associated cooperation between West Berkshire Council and Wokingham Borough Council regarding development near the border of the two authorities.</p>
Turley for Berfeld Limited	<p>We consider that the spatial strategy should ensure that sufficient homes are provided in locations where people wish to live. There are some sustainability benefits from focusing new homes within or adjacent to existing settlements, but the concept of sustainability is complex and broad. It has many facets and restricting new development to locations that are within or adjacent to existing settlements does not allow for developments that are not in this situation to come forward, even if they are sustainable.</p> <p>There is also little recognition of the potential for technological change over the period of the Local Plan to 2036. Within that period, it is highly likely that sustainable electric vehicles will become prevalent, and improved technology will also mean people are less likely to need to access towns to access services. Technological change will challenge current interpretations of sustainable development and the Council should ensure there is sufficient flexibility in the wording of its policy to allow for this change.</p> <p>We therefore consider that it is appropriate to focus development on existing settlements, but to also ensure that there is flexibility built into the policy to allow for the consideration of development that is capable of achieving sustainability outside of a normative and narrow interpretation.</p>
Turley for Commercial Estates Group	<p>The existing spatial strategy has been surpassed by events, such as the publication of the Berkshire (including South Bucks) Strategic Housing Market Area Assessment (SHMA), as well as cross-boundary issues that have arisen. As such, it is considered that the emerging Spatial Strategy should be revised such that it accords with an up-to-date evidence base and responds effectively to prevailing planning issues. This may result in the existing strategy being carried forward but it would be premature to make that decision prior to the evidence being produced and thoroughly reviewed.</p> <p>Accordingly, we maintain that the Core Strategy Review should make provision for an evidence-based review of the existing settlement hierarchy established at Policy ADPP1. This will be necessary to establish a robust spatial strategy, particularly as the existing typology may no longer be entirely consistent within the context of a cross-boundary approach being pursued through the West of Berkshire Spatial Framework.</p> <p>However, it is nevertheless clear that the greater part of future development should be directed towards settlements at the higher-end of the hierarchy, with these being generally the more sustainable development locations such as Newbury, Thatcham and the Eastern Urban Area.</p> <p>It is also clear that effective forward planning in West Berkshire will require that a diversity of sites are allocated for development, so as to maximise opportunities for achieve sustainable development, whilst further planning for new infrastructure and additional services. This is of particular relevance adjacent to the existing or consented development, where that infrastructure is already in place / planned for and new development can be both supported by it and can help to enhance / grow that provision.</p> <p>With respect to the Duty to Cooperate, we agree that the preparation of a West of Berkshire Spatial Planning Framework</p>

Respondent	Response
	<p>provides a suitable mechanism for planning on a cross-boundary basis, within this respective part of the SHMA area. However, we caution that (in drawing from this non-statutory document) it will be important for the Local Plan process to provide robust evidence to justify the decisions that have been reached, including if these decisions have been reached collaboratively, as part of the SPF.</p> <p>The importance of a robust approach on this matter has been clearly demonstrated through the recent West Oxfordshire Local Plan Examination in Public (EiP), where key decisions were taken through non-statutory processes under the auspices of the 'Oxfordshire Growth Board'. The EiP served to highlight the importance of ensuring that non-statutory (and cross-boundary) decision making-processes are supported by an appropriate and robust evidence base. Likewise, non-statutory decisions (regarding, for example, the distribution of housing growth) to be reconciled with the findings of a (statutory) Local Plan's Sustainability Appraisal.</p> <p>It is positive that the West of Berkshire Spatial Framework and the Local Plan Review Scoping Report (at paragraph 5.7) recognises the continued importance of cooperation and cross-boundary issues between West Berkshire, Wokingham, Reading and Bracknell Forest. However, we express concern that Local Plan Review's focus on the West of Berkshire Spatial Framework, shall effectively serve to preclude or downgrade cooperation with authorities situated to the east. This is concerning in itself, but particularly so as cross-boundary housing and economic issues are not self-contained within the Western HMA.</p> <p>Accordingly, the West of Berkshire authorities (including West Berkshire) should not seek to preclude the potential requirement to accommodate at least part of the significant quantum of need, which may not be effectively met within the boundaries of the authorities to the east.</p> <p>Furthermore, we are also concerned that there is a risk that the Local Plan Review will reflect the limitations of the SHMA (and indeed the Western Berkshire Economic Development Needs Assessment, 2016), with respect to analysing the impacts of major planned investments in economic infrastructure. Indeed, the SHMA (at paragraph 5.50) explains that it does not account for;</p> <p>"competitive position of Berkshire and South Buckinghamshire in terms, for example of specific infrastructure investment, which might have both positive or negative impacts on inward investment and business growth; for example, the introduction of services on Crossrail, or the provision of a western rail access to Heathrow" (SHMA para 5.50).</p> <p>Such economic investments will invariably impact upon the dynamics of the regional economy and housing markets. We therefore consider that it is essential for the Local Plan Review to be based on robust evidence, which evaluates the implications of the infrastructure investments described. If the Plan is not informed by such an analysis, we would consider that there is a risk of it failing to properly address the housing pressures and affordability issues that may arise.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The current spatial strategy as set out in the Core Strategy builds on the existing settlement pattern, and this is generally supported. However, the settlement hierarchy set out in paragraph 5.2 of the Scoping Report (February 2018) only relates to the larger settlements of:</p> <ol style="list-style-type: none"> <li>1. Urban Areas;</li> <li>2. Rural Service Centres;</li> </ol>

Respondent	Response
	<p>3. Service Villages.</p> <p>No reference is made to the many villages below the settlement hierarchy which have got defined settlement boundaries, such as Hampstead Norreys.</p> <p>The generally urban focus is further emphasised by paragraph 5.3 which states: <b><i>'In this context, urban development is maximised and a combination of strategic urban extensions and smaller sites for housing have also been identified for development.'</i></b></p> <p>This urban focus needs to be counterbalanced by a similar emphasis on the need to also support vibrant rural communities. For example, Hampstead Norreys, is a vibrant village with a primary school; community shop; sports pitches; village hall; church; and public house. The future of these facilities depends on a mixed community in which all age groups are represented. There is therefore the need for some additional housing to satisfy local needs, including those who have a local connection or need to work in the village, and thereby ensure that young people and families will continue to have the opportunity to live there.</p>
Woolf Bond Planning for Donnington New Homes	<p>Area Delivery Plan Policy 1 (Spatial Strategy) of the current 2012 Core Strategy provides:  'Below the settlement hierarchy there are two additional types of area where there will be more limited development, including affordable housing for local needs:</p> <ul style="list-style-type: none"> <li>• <b>smaller villages with settlement boundaries - suitable only for limited infill development subject to the character and form of the settlement',</b></li> </ul> <p>It follows that under the existing spatial strategy, the Core Strategy does not provide for the ability to extend smaller villages with defined settlement boundaries. We consider there would be strong benefit in changing this approach and explicitly identifying sustainable and appropriate extensions to smaller villages in certain locations in the District. We refer to three parts of the emerging draft NPPF that support and advocate such an approach:  Paragraph 80 refers to the importance of plans needing to identify opportunities for villages to grow:  'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should <b>identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'</b>.</p> <p>The above statement is not specific to any given size of village, it simply requires that sustainable development should be promoted in rural areas and plans should identify opportunities for such settlements to grow. It follow that any <b><u>decision to continue to exclude the ability to extend smaller villages with boundaries (as per the existing spatial strategy) would fail the 'consistent with national policy' test of soundness.</u></b></p> <p>Paragraph 118 goes onto state:  'Planning policies and decisions should:  <b>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more</b></p>



Respondent	Response
	<p><b>effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)36;'</b></p> <p>The approach advocated at paragraph 80 of the draft NPPF is further supported by paragraph 118 that specifically acknowledges the benefits of promoting and supporting the development of under-utilised land. One such under utilised sustainable development opportunity exists at our client's site at Ashmore Green Farm (discussed in further detail below). Further, paragraph 69 refers to the need for 20% of housing in new local plans to be 'small sites':</p> <p>'Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <p><b>a) ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less';</b></p> <p>The above acknowledges the important role smaller sized sites can play in new Local Plans and their importance in adding to the diversity in the types of housing sites allocated to contribute towards challenging housing targets. Whilst not strictly a small site on the basis of its site area, our client's site by forming a capacity of up to 30 no. dwellings (net 29) can justifiably be described as a small site and would add to the overall diversity of housing sites if allocated in the future plan.</p> <p>Ashmore Green forms a settlement well related to two of the District's 'Urban Areas' (Newbury and Thatcham) that are home to a wide range of services and form the focus for the majority of development in the existing plan. The village is located under 1 mile from the edge of Thatcham and is home to a bus service (No. 41) that provides regular connections to the 'Urban Areas'. In addition, the settlement is located approximately half a mile away from the 'Service Village' of Cold Ash. In addition unlike much of the District, the settlement is located outside the nationally protected North Wessex Downs Area of Outstanding Natural Beauty.</p> <p>Our client's site adjoins the Ashmore Green settlement area and forms land already home to a series of large buildings that have not been in an active use for a long period of time, over 20 years. It follows that our client's site represents one of the most sustainable locations in helping to meet the District's housing requirements, through delivering smaller sites to aid in immediate housing delivery. It forms a natural extension to the settlement boundary and offers the potential to have positive impacts upon the character and appearance of the wider locality. In addition, by forming a potential smaller site from land that is redundant, it specifically complies with emerging NPPF policy referenced above.</p> <p>For the above reasons we are of the strong view that an <b><u>extension to Ashmore Green should occur and accordingly the subject 1.5ha site, forming land adjoining Ashmore Green should be identified in the emerging plan as a housing allocation.</u></b> The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan.</p>
Woolf Bond Planning for JJP Land	<p>Area Delivery Plan Policy 6 (The East Kennet Valley) of the current 2012 Core Strategy indicates:</p> <p>'The two identified rural service centres of Burghfield Common and Mortimer will be the focus of development in this area',</p> <p>The acceptable scale of development around Burghfield Common is confirmed through the allocation of sites within the Council's Housing Site Allocations Local Plan (2017). Policy HSA15 allocates land adjoining Pondhouse Farm, Burghfield</p>

Respondent	Response
	<p>Common for approximately 100 dwellings with policy HSA16 allocating land to the rear of The Hollies, Burghfield Common for approximately 60 dwellings.</p> <p>It follows that under the existing spatial strategy, the Core Strategy enables multiple sites of around 100 dwellings to be allocated on the edge of Burghfield Common. We consider the emerging plan needs to retain the ability of sustainable rural service centres like Burghfield Common to accommodate further growth.</p> <p>Allowing further growth at Burghfield Common is consistent with paragraph 80 of the emerging draft NPPF which highlights the importance of plans needing to identify opportunities for villages to grow:</p> <p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p> <p>Our client considers that there is currently an anomaly regarding the settlement boundary for Burghfield Common through its exclusion of the established residential developments off Rowan Way and Caxton Gate. These are the largest established residential schemes within West Berkshire which adjoin a settlement rather than are incorporated within. Given the number of dwellings on these developments and its clear linkage to the settlement boundary of Burghfield Common, these dwellings should be incorporated within it. The consistency of the character of these residential areas with Burghfield Common village reinforce our view that these dwellings must be included within the settlement boundary. Through including the established residential area off Rowan Way and Caxton Gate within Burghfield Common's settlement boundary results in our clients' land at Brook House Farm being a logical addition to the settlement. Our clients scheme for 40 dwellings is consistent with the scale of schemes which the Council has allocated to the village through their Housing Site Allocations Local Plan.</p> <p>For the above reasons we are of the strong view that an extension to Burghfield Common should occur and accordingly the subject 2.9ha site, forming land at Brook House Farm should be identified in the emerging plan as a housing allocation. The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan.</p>
Woolf Bond Planning for Donnington New Homes	<p>Area Delivery Plan Policy 1 (Spatial Strategy) of the current 2012 Core Strategy provides:</p> <p>'Below the settlement hierarchy there are two additional types of area where there will be more limited development, including affordable housing for local needs:</p> <ul style="list-style-type: none"> <li>• <b>smaller villages with settlement boundaries - suitable only for limited infill development subject to the character and form of the settlement'</b>,</li> </ul> <p>It follows that under the existing spatial strategy, the Core Strategy does not provide for the ability to extend smaller villages with defined settlement boundaries. We consider there would be strong benefit in changing this approach and explicitly identifying sustainable and appropriate extensions to smaller villages in certain locations in the District. We refer to two parts of the emerging draft NPPF that support and advocate such an approach:</p> <p>Paragraph 80 refers to the importance of plans needing to identify opportunities for villages to grow:</p>

Respondent	Response
	<p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p> <p>The above statement is not specific to any given size of village, it simply requires that sustainable development should be promoted in rural areas and plans should identify opportunities for such settlements to grow. It follows that any <b><u>decision to continue to exclude the ability to extend smaller villages with boundaries (as per the existing spatial strategy) would fail the 'consistent with national policy' test of soundness.</u></b></p> <p>Further, paragraph 69 refers to the need for 20% of housing in new local plans to be 'small sites':  'Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <ol style="list-style-type: none"> <li><b>a) ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less';</b></li> </ol> <p>The above acknowledges the important role smaller sized sites can play in new Local Plans and their importance in adding to the diversity in the types of housing sites allocated to contribute towards challenging housing targets. Whilst not strictly a small site on the basis of its site area, our client's site by forming a capacity could be described as a small site if allocated for a mix of residential and associated uses and would add to the overall diversity of housing sites if allocated in the future plan.</p> <p>Curridge forms a settlement located close to the District's largest 'Urban Area' (Newbury) that is home to a wide range of services and forms the focus for the majority of development in the existing plan. In addition, Curridge benefits from a primary school and the settlement is located in close proximity to the 'Service Village' of Hermitage and the Strategic Road Network in the form of the M4 motorway.</p> <p>Our client's site adjoins the Curridge settlement area on its southern and eastern boundaries and provides the opportunity to adjoin the two parts of the village in a holistic plan led manner. This could include associated community uses that could form a focal point and pedestrian access between the two presently detached parts of the settlement. It follows that our client's site represents one of the most sustainable locations in helping to meet the District's housing requirements. It forms a natural extension, to join the two separate settlement boundary areas of Curridge. In addition, it could be considered to form a potential smaller site and therefore complies with emerging NPPF policy referenced above.</p> <p>For the above reasons we are of the strong view that an <b><u>extension to Curridge should occur and accordingly the subject 4.16ha site, forming land adjoining Curridge should be identified in the emerging plan as a housing allocation.</u></b> The site could be delivered inside the 5 year period and therefore soon after the adoption of the plan.</p>
WYG for Donnington New Homes	<p>Donnington New Homes support West Berkshire's proposal to continue to build on the existing settlement pattern which will continue to use a hierarchy of settlements as the focus for development. Adopted Core Strategy Policy ADPP1 designates Newbury as an urban area with a wide range of services and the focus for the majority of development. A southern extension to Sandford Park would support this approach and also support the provisions of paragraph 5.3 and 5.7 of the consultation document.</p>

## Summary of responses

The majority of respondents stated that they thought the existing spatial strategy had worked well and that it would continue to be the most appropriate approach for development up to 2036 in West Berkshire. With one exception, this included all parish councils and neighbourhood planning groups. The parish council that disagreed argued for further consideration to be given to garden villages where it felt that infrastructure needs and a community sense of place could be considered more holistically. The development industry highlighted the fact that the spatial strategy would need to be altered in order to accommodate a new settlement and were divided as to whether this was a good idea.

The capacity of the Eastern Urban Area to accommodate more growth was questioned, particularly the tension that exists between the need for development in the area and its location on the edge of the AONB. The role of Thatcham was also raised, with the expectation that following a period of restraint in the current plan, there was now an opportunity to plan for a period of growth.

There were some respondents who felt that whilst the spatial approach itself was acceptable in principle, the Council will need to re-examine the settlement hierarchy which supports it, in more detail, in order to establish the role and function of each settlement in each area. Specific concerns were raised, from both the development industry and some local communities that certain settlements were not now in the right category. Another suggested that a new category of 'principal rural service centres' could be introduced whilst others thought that smaller villages and the rural areas themselves should also be included. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

It was generally considered that a review of settlement boundaries for all settlements will be an important part of the Review and that this process should then be used to inform the overall spatial strategy for the District. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions.

Overall, the development industry felt the Council needed to be more flexible in its approach to rural settlements, particularly to those which currently sit below the current hierarchy. There were also suggestions from a few site promoters that more development, particularly in smaller villages, would help prevent the further loss of rural services.

## Council response

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The support given to the continuation of the existing spatial strategy is welcomed but the capacity of the Eastern Urban Area to accommodate future growth is an issue which requires further consideration. The Council will therefore review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries. A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

#### Q4: Do you agree that dividing the District into different geographical areas is still the most appropriate way to deliver the spatial strategy?

Number of responses received: 41

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	Generally yes, but Character studies should also be factored in, especially if these do not align with the geographical areas – eg Historic Environment Character Zoning documents <a href="http://info.westberks.gov.uk/index.aspx?articleid=30418">http://info.westberks.gov.uk/index.aspx?articleid=30418</a>
Public Transport Team West Berkshire Council	I agree that dividing the District into the four main geographical areas as reflected in section 4.7 of the Spatial Strategy remains the most appropriate way to deliver the strategy, as this approach – coupled with the associated Area Delivery Plan Policies – takes into account the distinctive features of these distinguishable areas of the District
<b>Statutory consultees</b>	
Stratfield Mortimer Parish Council	Because of the arguments put forward in the previous answer a more District wide approach should be adopted. This becomes even more imperative when working with adjacent planning authorities on potential developments that cross district boundaries. That is not to say that recognition of the different characteristics of different part of the Districts should not be recognised, rather that should just be one consideration amongst many equally important factors.
Streatley Parish Council	Streatley Parish Council agrees that the 4 geographic areas for the district are still most appropriate, especially the AONB.
Hermitage Parish Council	Yes. This is the only question that Hermitage PC is confident to answer.
Pangbourne Parish Council	Yes because it continues to build on the existing settlement pattern.
Burghfield Parish Council	Yes. It worked well in relation to the current Local Plan and I see no reason to change it.
Burghfield NDP Steering Group	Yes. It worked well in relation to the current Local Plan and we see no reason to change it.
Environment Agency	This question is not within our remit. However our advice to you is to carry out the sequential test for fluvial flood risk when considering the location of development.

Respondent	Response
Sport England	Yes, it allows responses/actions to be focused and relevant to specific areas, rather than a broad brush policy approach which may not always be appropriate.
Savills for Thames Water	Yes
<b>General consultation bodies</b>	
British Horse Society	It seems appropriate from an equestrian point of view.
<b>Other stakeholders</b>	
Christopher Gent	The division of the District into different geographic areas is a good idea as it enables an assessment of whether an appropriate balance has been achieved between development and countryside and affords a focus on whether there is sufficient infrastructure in each area.
William Graham	Yes
Neil Richardson	These seem to be appropriate but likely to be affected by large scale development south of Reading?
Robert Wallace	No as above
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Graham Child	Our client notes at paragraph 5.6 that the Scoping Report suggests that the geographical areas “...reflect the distinct characteristics of the different parts of the District”. However as part of the Local Plan Review the Scoping Report explains that the Council “...propose to re-examine whether this continues to remain the most appropriate way to deliver the spatial strategy to 2036”. We would submit therefore that the baseline evidence is required before concluding that this is the most appropriate way to deliver the spatial strategy.
Barton Willmore for Sulham Estate	On behalf of our client, we support the Council’s intention within the Local Plan Review Scoping report to re-examine whether the geographical areas continue to remain the most appropriate way to deliver the spatial strategy. Without seeing the Council’s methodology, evidence base or eventual conclusions for this is it not possible to provide detailed comments. Nevertheless, we consider that this review is an important part of providing a holistic approach to meeting needs throughout the District.
Bewley Homes	We do not agree that dividing the Borough into geographical areas is an appropriate way to deliver the spatial strategy. A more sophisticated test should be applied assessing the sustainability of individual settlements.

Respondent	Response
	<p>The historic 'geographical area' approach is considered too blunt a tool, which can allow the overlooking of settlements which offer a range of local services, and regular public transport links to employment centres both within the Borough and further afield.</p> <p>Following a settlement hierarchy approach, setting out the most sustainable towns and villages, with individual settlements assessed would be a more appropriate and allow housing to be allocated flexibly across the Borough. Woolhampton, for example is an established built up area identified as a 'Service Village' that is within the East Kennet Area. The village is served by a range of day to day services and facilities and has good access to both passenger transport services and local road networks. Details of the level of services provided are set out under Question 7. The settlement also falls outside of the North Wessex Area of Outstanding Natural Beauty landscape designation which restricts development across much of the Borough.</p>
Boyer Planning for Spitfire Bespoke Homes	Spitfire do not object to this approach but note that any potential growth at Grazeley should not restrict growth of other sites, particularly where this supports early and sustainable residential growth in villages in line with the draft NPPF.
Mark Carter for Mr R.L.A. Jones	<p>As with Question 3 above the Respondent considers that the existing method of examining the four main geographical areas of the District is the most appropriate way to examine future policies (and also the settlement hierarchy within those areas) is the most appropriate for the District.</p> <p>Within the North Wessex Downs Area of Outstanding Natural Beauty Lambourn still has a range of services and reasonable public transport provision which also serve the requirements of surrounding communities and these should be reinforced.</p> <p>Although there is much discussion about the role of surrounding Districts in meeting housing need these Districts are already heavily constrained and are unlikely to contribute. West Berkshire should be looking to meet its own (housing) needs within its boundaries.</p>
Fisher German for Mr Musgrave and Begley	The division of the District into geographical areas is not considered to be the most appropriate strategy. It is considered that development should be directed to settlements within the settlement hierarchy. For example, 60% to the urban areas, 25% to the rural service centres, and 15% to the service villages.
Gladman Developments	Gladman support the Council's proposal to re-examine whether the approach of establishing four geographical areas (Newbury and Thatcham, The Eastern Area, North Wessex Downs and East Kennet Valley) continues to be the most appropriate way of delivering the spatial strategy.
Hallam Land Management	Planning development within the confines of District boundaries is not an effective way to plan sustainable growth and West Berks along with its partners in the Western Berkshire Housing Market Area should be applauded for the work they have completed to date in considering opportunities across the Housing Market Area. Dividing the District into different geographical areas, imposing arbitrary boundaries and distributing the housing requirement accordingly sits uncomfortably with the more strategic approach to planning which is emerging and has the potential to lead to parochial decisions and compromise opportunities for sustainable patterns of growth. It is our view, therefore, that as part of the

Respondent	Response
	Local Plan Review a very different approach should be adopted with the West Berkshire Local Plan forming an integral part of the Western Berkshire Strategic Plan as opposed to being wholly District focused and compartmentalised into smaller parcels.
Nexus Planning for Croudace	<p>The District is currently divided into four main geographical areas as follows:</p> <ul style="list-style-type: none"> <li>• Newbury and Thatcham;</li> <li>• The Eastern Area – including the Eastern Urban Area;</li> <li>• North Wessex Downs AONB;</li> <li>• The East Kennet Valley.</li> </ul> <p>Given their geographical proximity and functional relationship as the largest and most sustainable settlements within the District, Croudace Homes considers that combining Thatcham and Newbury into a single distinct area remains an appropriate strategy for delivering growth.</p> <p>There is a rationale for retaining the remaining areas in their current form as reflection of the different geographical areas of the District. Croudace Homes would therefore have no objection to retaining these areas as set out.</p>
Nexus Planning for Pangbourne Beaver Properties	<p>The District is currently divided into four main geographical areas as follows:</p> <ul style="list-style-type: none"> <li>• Newbury and Thatcham;</li> <li>• The Eastern Area – including the Eastern Urban Area;</li> <li>• North Wessex Downs AONB;</li> <li>• The East Kennet</li> </ul> <p>The North Wessex Downs AONB washes over the village of Pangbourne. The Core strategy states:</p> <p>“4.38 The North Wessex Downs AONB covers 74% of West Berkshire and makes a significant contribution to the uniqueness of the District. The settlement pattern will be maintained as both distinctive and ancient with a small and dispersed population within villages and small towns that have a strong sense of identity. The AONB will have appropriate sustainable growth throughout the plan period to support the local communities and rural economy.”</p> <p>It also states:</p> <p>“4.41 Pangbourne will remain an accessible thriving village community in an attractive and accessible setting within the AONB and will serve as a rural service centre for the surrounding villages. Small scale extensions in keeping with the existing character and pattern of development and in line with Pangbourne’s role as a rural service centre will help address issues of local housing need and provide opportunities for local people to buy a home in the village. The thriving district centre will continue to provide a good range of retail and leisure facilities, in the form of shops, pubs and restaurants. The diverse range of retail and leisure outlets will also help to form an important tourism base. <i>4.42 The service villages will continue to meet the needs of their residents and surrounding communities for facilities and services. Some small-scale development will have taken place to meet local needs, support the rural economy and sustain local facilities.</i>”</p>



Respondent	Response
	The four geographical areas are appropriate as a broad objective but this needs to be balanced against the amended settlement hierarchy that is proposed in para 4.4 above.
Pegasus Planning Group for Donnington New Homes	<p>Yes – this will ensure that homes are spread evenly across the District to most effectively meet housing need, and will ensure that the supply of housing land in the District is not over reliant on a small number of large-scale strategic sites which will concentrate development in certain areas of the District.</p> <p>Dividing the District into several geographical areas will allow the correct scale and style of development to be delivered in different areas across the District, given the distinct characteristics of each of the areas in question. Newbury and Thatcham are heavily developed, urban areas, and the focus of the highest density development in the district. The Eastern Area is a mix of more open, rural areas and urban, built-up areas such as Calcot, Purley on Thames and Tilehurst, whilst the North Wessex Downs Area of Natural Beauty is a predominantly open and rural area with very little development, aside from a few rural service centres and service villages. The East Kennet Valley is also predominantly rural, but includes some large employment sites such as AWE Aldermaston and Burghfield, which can restrict residential development given their associated risks. Given these differences, it is prescient to plan for each of them individually.</p>
Pegasus Planning Group for Donnington New Homes	<p>Yes – this will ensure that homes are spread evenly across the District to most effectively meet housing need, and will ensure that the supply of housing land in the District is not over reliant on a small number of large-scale strategic sites which will concentrate development in certain areas of the District.</p> <p>Dividing the District into several geographical areas will allow the correct scale and style of development to be delivered in different areas across the District, given the distinct characteristics of each of the areas in question. Newbury and Thatcham are heavily developed, urban areas, and the focus of the highest density development in the district. The Eastern Area is a mix of more open, rural areas and urban, built-up areas such as Calcot, Purley on Thames and Tilehurst, whilst the North Wessex Downs Area of Natural Beauty is a predominantly open and rural area with very little development, aside from a few rural service centres and service villages. The East Kennet Valley is also predominantly rural, but includes some large employment sites such as AWE Aldermaston and Burghfield, which can restrict residential development given their associated risks. Given these differences, it is prescient to plan for each of them individually.</p>
Pro Vision for Rootes Trustees	Yes
Pro Vision for Cala Group and Wates Developments	Yes
Pro Vision for Rivar	Yes
Savills for Englefield Estate	No specific comment is made at this stage, although the Council will need to consider how any new settlement might appropriately fit into this division by geographical area.
Joy Schlaudraff	YES, definitely. Exceptions, see above.

Respondent	Response
Turley for Commercial Estates Group	We do not consider that it is possible to provide an answer to this question until such time as the evidence-base has been updated, such that a properly justified and reasoned approach can be formed. Accordingly, we would simply suggest that the Local Plan Review considers the effectiveness of a sub-area approach against possible alternative options as well as its appropriateness in relation to the different characteristics across the District. We do, however, agree that a settlement hierarchy identifying the most sustainable settlements as the focus for the largest proportion of development is appropriate.
Turley for Berfeld Limited	We understand the rationale of dividing the District into four geographical areas, but we consider that the Council has a tendency to apply these artificial boundaries too rigidly in plan making and decision taking. For example, allocating housing delivery on fixed and inflexible figures to each spatial district based on assessed housing need across the whole Western Berkshire Strategic Housing Market Area, is inflexible and does not lead to the best plan making or decision taking. It may be appropriate to set out approximate targets for new homes across the spatial districts, but the policy wording should state that these are approximate and that there is scope to deviate from target figures. This would allow for more flexible decision taking to ensure that the overall presumption in favour of sustainable development is met.
Turley for A2dominion Housing Group	We consider that it is appropriate to establish policies for different parts of the District bearing in mind their different characteristics. Insofar as Streatley is concerned, we consider that this approach should have regard to the proximity of the settlement to Goring and the accessibility to local services and facilities and the interrelationship between the two locations.
Turley for North East Thatcham Consortium	<p>The Consortium considers that dividing the District into different geographical areas is an appropriate approach, provided that the strategy for each area is informed by an overarching strategy for the District as a whole.</p> <p>West Berkshire includes areas which are subject to different considerations. For example, the key urban areas of Newbury and Thatcham are geographically close and functionally related to one another. In contrast, the Eastern Urban Area shares a functional relationship with Reading. The North Wessex Downs Area of Outstanding Natural Beauty covers approximately 74% of West Berkshire and the restrictive approach to such areas in national planning policy requires a different strategy to that in other areas and moreover, this large part of the District does not include any of the most sustainable settlements (the most sustainable being Hungerford which is currently identified a Rural Service Centre). The East Kennet Valley lies outside of the AONB, and includes a number of settlements but none identified as being within the upper tiers of the settlement hierarchy.</p> <p>The highly contrasting characteristics of each part of West Berkshire suggest that a bespoke planning strategy be employed in each area.</p> <p>The Local Plan Review should ensure that policies for each geographic area are complementary and enable easy monitoring of delivery. Overlapping policies which ascribe or sub-divide requirements across areas should be avoided to ensure that there is a transparent rationale behind need and supply.</p>

Respondent	Response
West Waddy ADP for Gerald Palmer Eling Trust	As the different parts of West Berkshire have different characteristics it is agreed that dividing the District into different geographical areas is still the most appropriate way to deliver the spatial strategy.
Woolf Bond Planning for JJP Land	We do not object to this approach but note that any potential growth at Grazeley (paragraph 5.8 of Scoping Report) should not restrict growth of other sites within the Eastern Kennet Valley spatial area. If this occurred, it would undermine the approach of the draft NPPF to supporting growth in villages.
Woolf Bond Planning for Donnington New Homes	We do not object to this approach but do note the specific need to identify land in rural areas and on smaller sized sites, particularly where land is under-utilised in the revised NPPF.
Woolf Bond Planning for Donnington New Homes	We do not object to this approach but do note the specific need to identify land in rural areas and on smaller sized sites, particularly where land is under-utilised as stated in the revised NPPF.

## Summary of responses

The majority of respondents, including parish councils and statutory consultees, stated that they felt dividing the district into geographical areas is still an appropriate mechanism to deliver the spatial strategy. They outlined that this approach is an effective way to meet housing need and it also takes into account the distinctive features and characteristics of the district, which allows policies to be focused and relevant rather than taking a broad brush approach. One parish council disagreed with this approach however, and responded stating that a more district wide approach should be adopted, but that the different characteristics of the district should be recognised among other equally important factors. One statutory consultee highlighted the need to carry out the sequential test for fluvial flood risk when considering the location of development.

Some of the development industry considered the geographical areas were appropriate as a broad objective but that it would need to be balanced against an amended settlement hierarchy. Some respondents took this further and felt that a more sophisticated method of assessing sustainability should be applied, and highlighted the settlement hierarchy itself as a more appropriate way to deliver the spatial strategy. The relationship between the spatial areas and the settlement hierarchy was strongly emphasised, with many highlighting the important role the settlement hierarchy plays in identifying sustainable locations for development.

It was felt by some in the development industry that geographical areas would ensure that the supply of housing land in the district would not be over reliant on a small number of large scale strategic sites but allowed for an even spread of sites across the district. There was support from a landowner for retaining Newbury and Thatcham as a distinct area, and others stated that overlapping policies which sub-divide requirements across areas should be avoided to ensure transparency. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions.

One landowner stated that dividing the district into geographical areas imposed arbitrary boundaries and distributing the housing requirement accordingly sits uncomfortably with the more strategic approach to planning which is emerging. It was outlined that geographical areas has the potential to lead to parochial decisions and compromise opportunities for sustainable patterns of growth. One of the responses from the development industry felt the Council had a tendency to apply these

artificial boundaries too rigidly in plan making and decision-taking and that flexibility was required, especially with regard to allocating housing figures for each spatial area.

Potential growth at Grazeley raised concern among some respondents who felt that such growth should not restrict the growth of other sites within that spatial area. Specific concern was also raised by landowners as to how a new settlement would fit into the mechanism of dividing the district into geographical areas. The specific need to identify land in rural areas and on smaller sized sites, as set out within the draft NPPF was set out in the responses of some site promoters. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

### **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The overwhelming support given to the effectiveness of dividing the District into geographical areas is welcomed but, in this context, the capacity of the Eastern Urban Area to accommodate future growth is an issue which requires further consideration. The Council will therefore review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries.

A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q5: Do you think there is a realistic opportunity for a large scale development to the south of Reading which could have the potential to be incorporated into the overall spatial strategy for the District? Please give reasons for your answer.**

Number of responses received: 49

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	Yes assuming sustainable development is proposed in terms of the historic environment of the area – we have yet to see any assessments.
Minerals and Waste Team West Berkshire Council	<p>Although it is acknowledged that here are no detailed plans for proposed development in this location, there are a number of operational minerals and waste sites with permanent and temporary planning permissions that are likely to be in close proximity to any large scale development in this area. The effect of any new residential development on the operation of these sites, should be considered in any future proposals.</p> <p>In general terms where any part of a site is underlain by aggregate mineral deposits then consideration of policies 1 and 2 of the Replacement Minerals Local Plan for Berkshire (Saved Policies) would be required. There are also areas in the vicinity of Grazeley which have been proposed as a Mineral Safeguarding Area in the emerging Minerals and Waste Local Plan (Preferred Options). There should be consideration given to the potential for sterilisation of mineral resources as a result of relevant future proposals.</p>
Public Transport Team West Berkshire Council	<p>Providing that all necessary supporting infrastructure and services are provided or upgraded in advance and that suitable mitigation is implemented to address the identified constraints, then I consider that there is a realistic opportunity to deliver a large-scale development to the south of the M4, south of Reading. This could potentially be delivered in partnership with Wokingham Borough Council, building on the joint activity that culminated in the production of the Spatial Planning Framework. Notwithstanding the constraints in the area, such as the proximity of the AWE Burghfield site, topography and drainage issues, there is substantial land available and limited potential to utilise capacity currently available on nearby radial routes into Reading (A33 and MereOak Park &amp; Ride, and via the Reading-Basingstoke rail line).</p> <p>In terms of transport infrastructure and services, given the outlying location of this proposed development in the vicinity of Grazeley and the lack of direct rail or road links from there to Newbury, as West Berkshire's administrative centre, and Thatcham, consideration should be given to:</p>

Respondent	Response
	<p>1. Construction or upgrading of road/s from the development linking through to the A4;</p> <p>2. Establishing and sustaining of peak and off-peak, high-quality, high-frequency public transport routes linking the development directly with:</p> <ul style="list-style-type: none"> <li>• established employment sites in West Berkshire including Calleva Park, AWE Aldermaston and Easter Park, and allowing for onward rapid travel to Thatcham and Newbury;</li> <li>• schools and amenities in Mortimer (the nearest Rural Service Centre in the District);</li> <li>• employment opportunities and amenities in the Reading area, including Reading International Business Park.</li> </ul> <p>This could potentially be achieved by complementing the existing ‘greenwave’ and the commercially-operated ‘lime’ branded high-quality bus routes.</p> <p>3. Scope to construct a new rail station at Grazeley, having regard to train pathing constraints and other developments planned for the Reading-Basingstoke line, including the pending construction of Reading Green Park Station. If an additional Grazeley Station is not deemed feasible, then upgrading of the station at Mortimer, coupled with connecting bus services to Mortimer and/or Reading Green Park Stations may be warranted.</p>
<b>Statutory consultees</b>	
Reading Borough Council	<p>Yes. Although, consideration should be given to the deposits of sharp and gravel that lie south of Reading, also the mineral extraction and processing site Bridge Farm. Where the need for development outweighs the benefits of protecting the mineral resource, there may be opportunities to accommodate both through the use of prior extraction. Prior extraction refers to the removal of a mineral before any development takes place on a site in order to avoid the loss of valuable mineral deposits, which once built over would not be accessible. The opportunity for prior extraction of the full resource may not always be available because of various factors, including the delivery program of development or the availability of the resource. However, in order to assist with the national policies for ensuring a steady and adequate supply of, it is important to make every effort to minimise the sterilisation of mineral resources. Furthermore, if development were to be proposed in close proximity to Bridge Farm, then appropriate buffers and mitigation measures should be incorporated into design proposals in order to make any nearby development compatible so that the site could continue its intended use. Early consultation on non-minerals and waste development proposals will allow for consideration of safeguarding of mineral resources and infrastructure and how this can be built into the scheme and not necessarily considered a barrier.</p>
Stratfield Mortimer Parish Council	<p>There clearly is scope for such an opportunity. However, our concern is that such a development would not be a true Garden Village but a mere extension of Reading across the motorway. Because, in our view, most of the new residents would see the development in that light, and would have existing connections that demanded access back to Reading, it would not be self-sustaining but cause all sorts of issues outside the boundary of the settlement. A ready example is the congestion at junction 11 of the M4 and along the A33 into Reading at present. To add 15,000 people just on the other side of the M4 would, in our view, lead to very much increased congestion. Similarly while GP facilities might be provided within the development, what would be the impact of the additional population on services at Royal Berkshire Hospital? Is</p>

Respondent	Response
	<p>it not the case that the infrastructure package for the settlement would largely be spent within the development itself (or on the immediate periphery) rather than on the wider network?</p> <p>While giving examples of issues with access to Reading it is also clear that traffic will be increased on the other roads around the area, including those through Mortimer. Another aspect of any development, but one that is thrown into sharp relief by the size of the proposed development is the timing of any infrastructure provision. For instance the provision of extra GPs in the area must happen at the same time as the increase in population if existing facilities are not to be overwhelmed</p>
Thatcham Town Council	Yes- due to the national need for housing this has great potential and importance in the overall spatial strategy.
Streatley Parish Council	<p>Streatley Parish Council agrees that a large scale development south of Reading makes a lot of sense for a number of reasons, including:</p> <ul style="list-style-type: none"> <li>a. It is close to existing major urban settlements and existing infrastructure and employment areas.</li> <li>b. It is strategically placed to support housing needs of 3 neighbouring Districts (West Berks, Wokingham and Reading).</li> <li>c. It will reduce the need to accommodate and provide numerous other sites scattered across the rest of the District.</li> <li>d. It is not in a sensitive "Green Belt" or AONB.</li> </ul>
Pangbourne Parish Council	<p>Yes I do. This development could deliver 15,000 new homes with supporting infrastructure and services, most of which would fall within the boundaries of WBC and Wokingham. The benefit to WBC would be at least 5,000 new houses. There may also be some further potential for development around Burghfield. This is clearly a long term vision and will involve massive investment in transport infrastructure which will eventually revolutionise access from the south into Reading. To enhance economic expansion we are dependent on infrastructure development outside our control, specifically Crossrail and the new runway at Heathrow both of which are important to Pangbourne. I also think that the difficulties we (and others) have faced in finding sites for housing it makes far more sense to develop and new town south of Reading with all the necessary services and infrastructure rather than expanding current village envelopes into AONB.</p>
Greenham Parish Council	<p>There has been overwhelming emphasis on housing in the Newbury &amp; Thatcham urban area in the 2026 Local Plan. We believe much of this merely accommodates commuters into Reading and therefore a new large housing development nearer to Reading at Grazeley ought to be pursued if at all possible as being more sustainable.</p>
Holybrook Parish Council	<p>Due to the lack of infrastructure in the urban areas, to the south of Reading, Holybrook Parish Council do not agree that there is a realistic opportunity for a large scale development.</p>
Burghfield Parish Council	<p>No. It would not be possible to build 5,000 new homes in the eastern fringe of West Berkshire without sacrificing an extensive area of attractive countryside, some of it in close proximity to AWE Burghfield and to the Thames Basin Heaths SPA.</p>

Respondent	Response
Burghfield NDP Steering Group	No. It would not be possible to build 5,000 new homes in the eastern fringe of West Berkshire without sacrificing an extensive area of attractive countryside, some of it in close proximity to AWE Burghfield and to the Thames Basin Heaths SPA.
Sport England	Yes, because the infrastructure which already exists within Reading
Environment Agency	<p>We don't know the exact location of the proposed large scale development south of Reading. However we have the following advice.</p> <p>Firstly we advise you to apply the flood risk sequential test when considering the location of any development. You will need to apply the sequential test as part of your evidence base for your local plan. You will need to be able to justify your choices for the location of development.</p> <p>If this scheme passes the sequential test and is compatible with the flood zone it lies in accordance with the flood risk tables 1, 2 and 3 in the Planning Practice Guidance then you will need to come to us for advice on other issues within our remit. Depending on where the development is located this can include, biodiversity and watercourses, groundwater quality and contaminated land, surface water quality and pollution prevention and fluvial flood risk.</p>
Savills for Thames Water	We believe it is something that's been considered for quite a few years. Thames Water has no objections to the plans and would welcome the opportunity to work with the Local Authority and developers on scale and phasing to ensure that any necessary infrastructure is delivered ahead of occupation.
<b>General consultation bodies</b>	
Mid & West Berks Local Access Forum	<p>We do not feel that it is within our remit to comment on where development should take place but, if this land area is developed, we recommend that:</p> <ol style="list-style-type: none"> <li data-bbox="658 959 2051 1054">i. Greenways / off-road paths are designed into the plans at an early stage to encourage non-motorised travel within the development and to other destination points. The example currently being implemented in Wokingham Borough may be useful to follow &amp; develop further.</li> <li data-bbox="658 1066 2051 1161">ii. Public Open Space (protected in perpetuity) is incorporated within walking distance of housing developments and reached by attractive, safe &amp; convenient off-road paths to encourage non-motorised travel. Existing use of land for current recreational activities needs to be retained or replaced with equivalent.</li> <li data-bbox="658 1173 2051 1268">iii. Off-road connections to the existing <u>public rights of way network</u> are designed into developments for all user groups to encourage Active Travel for both utility &amp; recreational purposes. New paths should be added to the Definitive Map and Statement at the correct status to ensure security and aid communication to the public.</li> </ol>
British Horse Society	It is not the Society's remit to comment on where development might take place but regard should be had to the existing equestrian establishments in the area and provision made for their retention. It should be noted that many horse riders



Respondent	Response
	live in urban areas and travel to where there horse is kept / or where they ride. The network of bridleways (which cater for most user groups) built into Milton Keynes are an example of development incorporating off-road paths for all to encourage non-motorised travel.
Reading Gospel Hall Trust	Development would be better elsewhere because of AWE and pre-existing traffic congestion.
<b>Other stakeholders</b>	
Robert Wallace	Reading will continue to grow in all directions - the critical issue by 2040 will be keeping it from linking up with Newbury and Pangbourne in a semi-continuous sprawl.
William Graham	It depends on the size of development being considered. Apart from the M4 and the M3 there are no major roads serving this area going East-West. Therefore the M4 between Junctions 12 and 10 in particular would become even more congested with local commuter traffic at rush hours. It should be protected as the main National East-West route. The M4 forms a barrier to southwards expansion at present. This should be resisted by developing all possible land in the Reading area north of the M4. Any large scale development should be considered as a stand-alone new “town” separated from Reading with its own infrastructure.
Neil Richardson	Major area of uncertainty that needs resolving soonest.
Christopher Gent	The large scale development proposed south of Reading, commonly referred to as Grazeley is a very good way of meeting the housing requirements across West Berkshire, Reading and Wokingham as it enables a coherent development as a single community with appropriate infrastructure such as schools, doctors surgeries, retail and leisure amenities. Such an approach is preferable to piecemeal development which adds additional strain on existing facilities as smaller scale does not normally come with increased infrastructure capacity.
<b>Landowners, site promoters and developers</b>	
Bewley Homes	However, whilst we agree in principle with this approach, it would have to be ensured that it was brought forward in combination with smaller sites to ensure a robust 5 year housing land supply is maintained. The delivery of infrastructure in terms of transport improvements and facilities would be fundamental for the project to be successful. Environmental constraints as well as the impact of AWE Burghfield would also need to be overcome.
Barton Willmore for Graham Child	Our client does not consider the need to comment on the sustainability of large scale development to the south of Reading as it is not considered relevant to the purpose of their representations. Moreover our client has not been provided with sufficient evidence with which to justify a meaningful response.

Respondent	Response
	<p>Notwithstanding this our client would note the deliverability of large sites previously with West Berkshire, which have been in some instances significantly delayed. Our client considers that it highlights the issues that can arise with large strategic sites and a cautious approach should therefore be taken in relation to their forecasted timeframes for delivery. As a consequence the Council have had to rely previously on windfall sites to deliver their housing requirement and indeed their 5 year delivery figures have been affected as a result.</p> <p>Whilst our client does not suggest that this should indicate that all strategic sites will encounter such delays, a broad recognition that larger strategic sites will deliver housing later in the plan period should be balanced by the allocation of smaller scale sites which have the ability to deliver earlier in the plan period. This will ensure that housing needs are met effectively with a steady delivery of homes and will also ensure that the council maintain a 5 year housing supply. Solely relying on large strategic sites is not considered conducive to a stable supply of housing. In this regard our client would highlight their land at Pangbourne Hill, which is able to deliver housing in the short/medium term and should therefore be considered for allocation within the emerging Local Plan.</p>
Barton Willmore for Sulham Estate	<p>We do not wish to comment specifically on a large-scale development to the south of Reading as it is not directly relevant to our client's representations. In addition, this consultation lacks any detailed information in relation to this which could provide the basis for a response.</p> <p>Nevertheless, we would like to comment that, in order for the Council to meet housing needs, we would support the allocation of a range of different site sizes across the District which are sustainably located and well-related to the 'Urban Areas' as identified within the Spatial Strategy.</p> <p>We would also like to comment that if the Council chooses to pursue large scale or strategic allocations, a cautious approach should be taken in terms of the forecasted timeframe for the delivery of houses.</p> <p>The recognition that larger strategic sites will deliver housing later in the plan period should be balanced by the allocation of small to medium scale sites which have the ability to deliver earlier in the plan period. This will ensure that housing needs are met effectively with a steady delivery of homes and will also ensure that the council maintain a 5 year housing supply.</p> <p>Our client's site, Land at Hall Place Farm Tilehurst, offers the opportunity to allocate a non-strategic scale site with the ability to deliver up to 80 homes in the short to medium term. The site is deliverable with all land within the ownership of our client.</p>
Boyer Planning for Spitfire Bespoke Homes Ltd	<p>Spitfire do not object to the principle of a new settlement at Grazeley, although it is essential that this is not at the expense of allowing early sustainable residential growth in villages in line with the draft NPPF.</p> <p>In addition to the importance of rural housing as outlined in Paragraph 80 of the draft NPPF (see above), it is noted that the draft NPPF (paragraph 69) recognises that "small sites can make an important contribution to meeting the housing requirements of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p>

Respondent	Response
	<p>a) Ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less...” For this reason, it is essential that the Local Plan Review allocates smaller sites which are capable of meeting a local housing need early in the Plan period.</p>
Mark Carter for Mr R.L.A. Jones	<p>The respondent does not think there is a realistic opportunity for a large scale development to the south of Reading with the potential to be incorporated into the overall spatial strategy for the District. 15,00 dwellings of which 5,000 would be in West Berkshire would be too dependant on Wokingham District and too many for West Berkshire to absorb. This is an idea which has existed for thirty years and has never progressed on any scale. The site is the wrong side of the M4 which heavily constrains traffic and is socially divisive, it has a number of sensitive environmental factors and is too close to the Atomic Weapons Establishment at Burghfield. Lastly a concentration of future development at the eastern end of the District would not serve West Berkshire. It would take overspill from Reading and Wokingham. It would not enable the steady growth of communities in West Berkshire which has occurred to date and which help to preserve important local facilities and services in West Berkshire communities such as Lambourn.</p>
The Chilton Estate	<p>Large new settlements of this nature can present practical and timing problems. The allocation of Sandford Farm, Newbury, as a strategic allocation in the Core Strategy has not proved successful. It has so far not come forward for development after many years and if it does it's likely to be under the control of a few larger developers which could have a restrictive impact on pricing and design. Accordingly land allocation should be concentrated on relatively small sites in areas such as Hungerford and Thatcham plus controlled growth within villages.</p>
Fisher German LLP for Mr Musgrave and Begley	<p>The allocation of the Garden Village new settlement is opposed and is of significant concern, both in terms of its physical impact, and its impact of the soundness of the development strategy and supply of housing. The site is alleged to have the opportunity to provide employment land and approximately 15,000 new homes, with 5,000 delivered in West Berkshire. Such a development will require large scale environmental and economic infrastructure, including a rail station, new roads, schools, flood alleviation and strategic scale green infrastructure. The site is being considered without detailed evidence that the site can be delivered in terms of environmental constraints, highways and utilities infrastructure. Until this work is completed, the new settlement should form no part of the proposed development strategy. The Council are already aware that the site has a number of strategic constraints and issues, not least that the land is within multiple ownerships and therefore land assembly would be required in order to deliver a single coherent scheme. In addition, large areas of the site are prone to flooding and it is unknown if alleviation of this to the level required in order to deliver a new settlement would be possible, and the site is close to an Atomic Weapons Establishment (AWE) where areas are safeguarded from increases in population in close proximity to the establishment. Funding has been directly sought from the Government in an Expression of Interest (EoI) in order to deliver the project. This includes £5.38m of capacity funding to pay for technical studies and a team of specialist staff to deliver the project. In</p>

Respondent	Response
	<p>addition, the Western Berkshire Council's have also requested £250m of forward funding from the Government in order to deliver the infrastructure required for the new settlement.</p> <p>In terms of the capacity funding, the EoI sets out that in the year 2016/17 it would require £325,000, with £1.764m in 2017/18, and approximately £800,000 in each of the next four years.</p> <p>In terms of the forward funding, the EoI sets out that the £250m will be required between 2018/19 and 2026/27.</p> <p>No decision has been made on the application as yet and as such the Council is behind in its delivery of their strategy as set out in the EoI. This strategy includes a housing and infrastructure trajectory which anticipates delivery of dwellings by 2020/21, with 6,700 dwellings projected to be delivered by the end of the Plan period in 2035/36. There is no break down as to which LPA areas these would be delivered within, however it is clear that the 15,000 overall units would not be delivered within the Plan period. In addition, there is no reasonable prospect that any delivery of units would be delivered by 2020/21.</p> <p>Having regard to the previous experience in delivering new settlements, the necessary infrastructure required for the development, including a new railway station, new access roads and schools, it is considered that the lead-in time for any such development and delivery of units would go beyond the Plan period. To assume that a new settlement will deliver any units within the Plan period will result in a Plan which is unable to meet the District's housing needs. As such it is considered that whilst planning for the new settlement can continue, in order to ensure the Plan is sound and that the OAN will be met it is considered that the existing settlements should be apportioned sustainable levels of growth.</p>
Gladman Developments	<p>It is essential that West Berkshire Council works pro-actively alongside relevant local authorities nearby to establish an appropriate strategy for the growth of the wider area. In particular, the continued growth of Reading will be vitally important in this context. Reading is already at a point where it is unable to meet its development needs within its administrative boundaries and it has a social and economic that extends into neighbouring areas. It is therefore essential that options to support the continued sustainable growth of Reading are robustly considered through the local plans of all of its neighbouring authorities. Such an approach will require opportunities for Reading's needs to be met within adjoining areas (including those that have not been defined within the Western Berkshire HMA such as South Oxfordshire). Any such approach should not however detract from the need for the Local Plan to support the sustainable growth of the main urban and rural settlements of West Berkshire.</p>
Hallam Land Management	<p>Over the course of a number of years HLM and WEL have commissioned a comprehensive review across all disciplines, the results of which are available to West Berkshire, and demonstrate that both technically and in terms of sound, sustainable planning there is a genuine and realistic opportunity to deliver a new settlement south of Reading. These conclusions are supported by:</p> <ul style="list-style-type: none"> <li>• The West of Berkshire Spatial Planning Framework December 2016</li> <li>• The Grazeley Garden Settlement Joint Expression of Interest submitted to Government July 2016. The Wokingham/West Berks/Reading Joint Housing Infrastructure Fund expression of interest submitted to Government September 2017 – now shortlisted.</li> </ul>

Respondent	Response
Nexus Planning for Pangbourne Beaver Properties	<p>The Council suggests that land to the south of Grazeley, south of Reading is being considered as a potential housing and mixed use development comprising approximately 15,000 homes. This development would straddle the local authority boundary and would comprise approximately 10,000 homes in Wokingham and 5,000 in West Berkshire.</p> <p>PBP Ltd does not object, as a matter of principle, to the allocation of what amounts to a new settlement to the south of Reading as a way of helping to meet future development needs in West Berkshire. But this new settlement should not detract from housing provision that will help to sustain existing settlements. It is also noted that housing delivery rates for new developments of this scale tend to be low, particularly in the early years due to the infrastructure requirements associated with this form of development. Implementation will be further complicated for a settlement that lies within two local authority areas.</p>
Nexus Planning for Croudace	<p>The Council suggests that land to the south of Grazeley, south of Reading is being considered as a potential housing and mixed use development comprised of approximately 10,000 homes in Wokingham and 5,000 in West Berkshire.</p> <p>Croudace Homes does not object, as a matter of principle, to the allocation of what amounts to a new settlement to the south of Reading as a way of helping to meet development needs in the District. However, this stance is predicated upon the Council, prior to making such an allocation, and prior to determining the scale of any such new allocation, ensuring that it has first maximised all sustainable options to deliver housing at the existing three strategic settlements and particularly at Thatcham.</p> <p>Whilst new settlements can of course deliver a range of benefits, urban extensions to existing settlements are generally preferable as they have much greater potential to ensure that the benefits, in terms of new infrastructure provision, accrue to both existing residents as well as new residents. New settlements, by their very nature, are self-contained and, therefore, generally provide infrastructure benefits to new residents only.</p> <p>We would also raise concerns regarding the potential delivery rates from a development of this scale. The emerging Local Plan is due for adoption at the end of 2020 but the Grazeley site crosses local authority boundaries would therefore require extensive cross boundary joint working. It is also likely that an Area Action Plan would be needed for development of this scale. Assuming this site is allocated, it would likely be followed by several outline planning applications with appropriate legal agreements which would be significant and complex for a development of this scale and nature.</p> <p>Further to this, conditions would need to be discharged and reserved matters submissions produced, submitted and determined. All of this would be required before enabling works on site can commence, let alone the construction and completion of houses. Given this lengthy lead in time, it is reasonable to assume that there would be no material start on site until the back end of the current Plan period at best, and possibility into the next Plan. In any event, the scope for delays aside, it would be mistake to rely too heavily on delivery of housing from a single site because it is highly questionable whether the market would be sufficiently strong to support the purchase of this many homes per annum, over a lengthy period of time, in a single location.</p> <p>To ensure a mixed portfolio of sites which will ensure delivery at the front end of the Plan period and throughout, as well as minimising risk associated with a new settlement, it is essential that the Council first ensures that all development opportunities at the three existing strategic settlements are maximised before determining the need for, and scale of, any</p>

Respondent	Response
	<p>new settlement proposal.</p> <p>In that regard, it has been demonstrated that the land at Henwick Park, Thatcham is suitable for development comprising at least 225 dwellings. Development at this site would make a meaningful contribution during the first five years of the Plan period.</p>
Origin3 Ltd for Sandtrend Ltd	<p>The West Berkshire Spatial Framework Plan provides the most suitable starting point in identifying suitable directions for new growth.</p> <p>Through working with the adjoining authorities of Reading Borough, Wokingham and Bracknell Forest, West Berkshire have identified broad site opportunities which span administrative boundaries and offer appropriate locations to direct new development.</p> <p>These locations are identified as Areas of Search in the Spatial Framework Plan. We support the Council's intentions to further explore development opportunities within these Areas of Search through the LPR.</p> <p>We understand from the Spatial Framework Plan 1, see attached document at Appendix 2, that the key Areas of Search within West Berkshire are at:</p> <ul style="list-style-type: none"> <li>• Land north of Newbury within the 'M4 Corridor'; and</li> <li>• At Grazeley, to the south of Reading</li> </ul> <p>This LPR provides an excellent opportunity for the Council to further test and explore the development prospects identified by the West of Berkshire Spatial Framework Plan. These broad areas have been identified by West Berkshire and the adjoining authorities as suitable locations for future growth, subject to detailed environmental assessment.</p> <p>It appears that through the LPR Scoping Report opportunities for a new settlement at Grazeley are being explored at length which, in principle, is supported providing a mix of other sites are also brought forward through the LPR. In order to balance supply and ensure that all reasonable alternatives are assessed, the Council should also explore development opportunities north of Newbury.</p> <p>The NPPF paragraph 182 stipulates that in order to be justified in the context of soundness, the plan should set out the most appropriate strategy, when considered against all reasonable alternatives.</p> <p>Development pressure to the north of Newbury is high due to excellent employment opportunities, excellent access and high quality housing and education. Through directing development to the north of the town, within the 'M4 corridor' new homes would be very well connected to both the immediate town of Newbury but also to Reading and the wider southeast region.</p> <p>Good connectivity to Reading has much wider benefits as it has been accepted by Reading Borough Council that it will struggle to meet its OAHN within its own administrative boundary.</p>
Pegasus Planning Group for Donnington New Homes	<p>No – there is not a realistic opportunity for incorporating a large-scale development to the south of Reading into the overall spatial strategy for the district. Any major development which is not delivered on land adjacent to an existing settlement would be a complete departure from the overall spatial strategy. This is because the current spatial strategy builds on the existing settlement pattern and suggests that land should only be allocated for housing development when it is adjacent to an existing settlement, as defined in Core Strategy Policy ADPP1, which states that:</p>

Respondent	Response
	<p>“Development in West Berkshire will follow the existing settlement pattern and comply with the spatial strategy set out in the Area Delivery Plan policies of this document based on the four spatial areas.”</p> <p>“Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below”</p> <p>“West Berkshire’s main urban areas will be the focus for most development.”</p> <p>Policy ADPP1 also states that only appropriate, limited development, which focuses on addressing identified needs and maintaining a strong rural economy, will be allowed in the open countryside.</p> <p>If a large-scale development to the south of Reading is incorporated into the overall spatial strategy for the district, it should not be relied upon to contribute towards West Berkshire Council’s five-year housing land supply, as work on the strategic site is currently at very early stages, and will take decades to come forward given its complexities. These complexities include the site’s location within the boundaries of three Local Planning Authorities, its potential size of approximately 15,000 dwellings, and the complete lack of infrastructure at the site currently.</p>
Pegasus Planning Group for Donnington New Homes	<p>No – there is not a realistic opportunity for incorporating a large-scale development to the south of Reading into the overall spatial strategy for the district. Any major development which is not delivered on land adjacent to an existing settlement would be a complete departure from the overall spatial strategy. This is because the current spatial strategy builds on the existing settlement pattern and suggests that land should only be allocated for housing development when it is adjacent to an existing settlement, as defined in Core Strategy Policy ADPP1, which states that:</p> <p>“Development in West Berkshire will follow the existing settlement pattern and comply with the spatial strategy set out in the Area Delivery Plan policies of this document based on the four spatial areas.”</p> <p>“Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below”</p> <p>“West Berkshire’s main urban areas will be the focus for most development.”</p> <p>Policy ADPP1 also states that only appropriate, limited development, which focuses on addressing identified needs and maintaining a strong rural economy, will be allowed in the open countryside.</p> <p>If a large-scale development to the south of Reading is incorporated into the overall spatial strategy for the district, it should not be relied upon to contribute towards West Berkshire Council’s housing land supply over the period to 2036, as work on the strategic site is currently at very early stages, and will take decades to come forward given its complexities. These complexities include the site’s location within the boundaries of three Local Planning Authorities, its potential size of approximately 15,000 dwellings, and the complete lack of infrastructure at the site currently.</p> <p>It is reasonable to consider that a new settlement such as this could contribute to housing supply, post 2036.</p>
Pro Vision for Rootes Trustees	<p>Large scale development south of Junction 11 of the M4 would significantly distort the existing spatial strategy and undermine the sustainable development objectives of supporting and enhancing the viability and vitality of existing settlements and promoting sustainable economic growth. The main focus of growth should continue to be in the Urban Areas, with further growth directed to the existing Rural Service Centres, including Hungerford, and Service Villages. The SHLAA demonstrates that there is capacity to accommodate the likely level of need for additional housing and employment land within, or as extensions to, the existing settlements.</p>

Respondent	Response
	<p>Not only would a new settlement located at the eastern extremity of the District undermine the viability and vitality of the existing settlement hierarchy, but it is likely to increase travel demands and undermine the objective of making as much use as possible of previously developed land. It will also raise issues about housing delivery, particularly in the light of the emerging Housing Delivery Test that will quickly penalise LPA's that rely heavily on large strategic sites that by their very nature are slow in delivering housing and very susceptible to delay due to their significant infrastructure requirements.</p>
Pro Vision for Cala Group and Wates Developments	<p>Large scale development south of Junction 11 of the M4 would significantly distort the existing spatial strategy and undermine the sustainable development objectives of supporting and enhancing the viability and vitality of existing settlements and promoting sustainable economic growth. The main focus of growth should continue to be in the Urban Areas, with further growth directed to the existing Rural Service Centres, including Hungerford, and Service Villages. The SHLAA demonstrates that there is capacity to accommodate the likely level of need for additional housing and employment land within, or as extensions to, the existing settlements.</p> <p>Not only would a new settlement located at the eastern extremity of the District undermine the viability and vitality of the existing settlement hierarchy, but it is likely to increase travel demands and undermine the objective of making as much use as possible of previously developed land. It will also raise issues about housing delivery, particularly in the light of the emerging Housing Delivery Test that will quickly penalise LPA's that rely heavily on large strategic sites that by their very nature are slow in delivering housing and very susceptible to delay due to their significant infrastructure requirements.</p>
Pro Vision for Rivar	<p>Large scale development south of Junction 11 of the M4 would significantly distort the existing spatial strategy and undermine the sustainable development objectives of supporting and enhancing the viability and vitality of existing settlements and promoting sustainable economic growth. The main focus of growth should continue to be at Newbury and Thatcham, with more modest growth directed to the existing Rural Service Centres and Service Villages. The SHLAA demonstrates that there is capacity to accommodate the likely level of need for additional housing and employment land within, or as extensions to, the existing settlements.</p> <p>Not only would a new settlement located at the eastern extremity of the District undermine the viability and vitality of the existing settlement hierarchy, but it is likely to increase travel demands and undermine the objective of making as much use as possible of previously developed land. It will also raise issues about housing delivery.</p>
RPS for AWE	<p>AWE Burghfield currently provides capability for assembly and disassembly of warheads together with limited component manufacture and storage. It is the only site in the UK that provides this function. Future capabilities will continue to include assembly and disassembly of warheads for the foreseeable future but also a potential increase in the component manufacture. This is evidenced by the modernisation and redevelopment programme that has been pursued over the last 10 years. In addition, provision will need to be made for AWE B to provide capabilities, if required, for storage of materials.</p> <p>Any major housing development in the vicinity of AWE Burghfield will need to be compliant with the requirements of the emergency planning area (also known as the Detailed Emergency Planning Zone) which is currently under review,</p>



Respondent	Response
	<p>together with the associated Emergency Plan. Local planning polices are already in place which seek to prevent inappropriate development, such as housing, within the EPA on the grounds of public safety.</p> <p>Future capabilities may also require consideration of the application of the Control of Major Accident Hazards regulations which could be affected by the presence of major development close to AWE Burghfield.</p> <p>In summary careful consideration needs to be given to the location of any major development close to AWE Burghfield and in particular within the EPA to ensure that there is no potential impact upon current and / or future site operations.</p>
Savills for Englefield Estate	<p>The Englefield Estate are one of the key landowners affected by the potential new settlement at Grazeley. Should the relevant Councils (Wokingham Borough and West Berkshire) consider that this is the most appropriate location for new growth to meet the needs of the West Berkshire Housing Market Area, the land is available for development. The Estate considers the land to be suitable, being relatively unconstrained in planning policy terms and well located to existing or proposed infrastructure improvements.</p>
Joy Schlaudraff	<p>I think this is somewhat unrealistic. The development of that many houses has potential in the area, but needs to be dispersed throughout the south of Reading and in other areas, in small groups of around 25-50, through the exceptions policy spoken of in Question 3 and 4 above.</p> <p>More flexibility in identifying suitable land for housing is needed, and it needs to be easier for people to find out if their land has development potential or not, and where.</p>
Turley for Commercial Estates Group	<p>The Local Plan Review is right to consider the possibility of delivering a new settlement at Grazeley. However, the development of what amounts to a new settlement at this location cannot be guaranteed and will invariably take a very long time to deliver. We draw the Council's attention to the experience of Swindon Borough Council, which has attempted to deliver a comparable allocation 'New Eastern Villages' (comprising 8,000 dwellings), but which has been plagued by difficulties that have impeded development. Not coincidentally, the land supply position in Swindon is presently less than 3 years and therefore falls significantly short of the requisite 5 years.</p> <p>Similarly, should Grazeley come forward, it is likely to contribute towards meeting Reading's and Wokingham's unmet need, rather than West Berkshire's. This is by virtue of the Grazeley site being situated adjacent to the Reading / Wokingham conurbation, and being dislocated from Newbury and other major settlements in West Berkshire. Accordingly, whilst we certainly consider that large allocations should play a key role in the spatial strategy, we strongly advise against an over-reliance on the 'Grazeley Solution'.</p>
Turley for Berfeld Limited	<p>Yes. We consider that there should be explicit recognition in the policy of the West of Berkshire Spatial Planning Framework. This is a joint agreement between the authorities of Bracknell Forest Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council.</p> <p>This identifies that "up to 2036 the area needs to deliver in the region of 65,665 new dwellings to deal with population growth, affordability, market factors, sustaining and improving economic growth and the impact of the growth of London. This means finding land for just under 3,000 homes per year."</p>

Respondent	Response
	The Spatial Planning Framework has resulted in Reading Borough Council making a formal request to Wokingham Borough Council and West Berkshire Council in a 'Statement of Collaboration' to assist in their shortfall in unmet need for housing.
Turley for North East Thatcham Consortium	<p>The Consortium considers that any proposals for large scale development in the area to the south of Reading will need to be informed by the characteristics in that area, particularly the presence of areas at risk of flooding and the proximity of the area to the AWE facility at Burghfield which may represent a constraint on development in response to public safety considerations.</p> <p>In any event, the Consortium considers that large scale development to the south of Reading would serve to meet the needs of other authorities, namely Reading and Wokingham Boroughs. The area south of Reading has little, if any, functional relationship with the remainder of West Berkshire given the distance between this area and West Berkshire's main urban areas and principal settlements.</p> <p>Furthermore, the Consortium considers that any infrastructure and facilities provided as part of large scale development to the south of Reading would not provide any opportunities to help address the long established aspirations elsewhere in West Berkshire. For example development south of Reading would not assist in regenerating Thatcham, making it a more self-contained settlement or the pressing need for infrastructure delivery at the town.</p> <p>The Consortium considers that the Council should first and foremost seek opportunities within the District which will make a positive contribution to achieving sustainable development in West Berkshire. That is likely to be significantly more achievable at the settlements within the District rather than in a part of West Berkshire which is likely to have no functional relationship with Newbury/Thatcham but instead with Reading and Wokingham Boroughs.</p>
West Waddy ADP for Gerald Palmer Eling Trust	This is not relevant to the interests of the Gerald Palmer Eling Trust and so no opinion is expressed on this matter.
Woolf Bond Planning for Donnington New Homes	If this proposal is to be progressed then we note that it will require substantial infrastructure provision (with long lead in periods) and collaborative working with Wokingham Borough Council These factors could result in housing delivery not commencing until the very end of the Local Plan at best, with the majority of delivery being post 2036. We would suggest that the allocation of a range of sites, adjacent to existing settlements elsewhere in the District would therefore benefit from allocation to supplement this site and enable delivery at an early stage in the plan period.
Woolf Bond Planning for Donnington New Homes	If this proposal is to be progressed then we note that it will require substantial infrastructure provision (with long lead in periods) and collaborative working with Wokingham Borough Council These factors could result in housing delivery not commencing until the very end of the Local Plan at best, with the majority of delivery being post 2036. We would suggest that the allocation of a range of sites, adjacent to existing settlements elsewhere in the District would therefore benefit from allocation to supplement this site and enable delivery at an early stage in the plan period.
WYG for Donnington New Homes	Donnington New Homes believe that there are significant risks associated with the delivery of much of the Districts housing need through one strategic site, particularly given the specific constraints identified at paragraph 5.8. Donnington

Respondent	Response
	<p>New Homes believe while the strategic site should be considered to meet longer term housing and infrastructure needs, there is a more immediate requirement for the delivery of housing, which can be better met through a range of allocations adjoining the existing main urban areas, particularly as it will ensure a continued distribution of housing across the local plan area. Land at SPS provides a large- scale development, which will benefit from new and approved infrastructure associated with the development of the wider Sandford Park, without the constraints associated with the delivery of the development to the south of Reading - namely the scale of the proposal; its location within the consultation zone of the Atomic Weapons Establishment (AWE) Burghfield (which calls into question whether a development of the scale envisaged can be delivered in this location); the inevitable additional time required to progress the development given its cross-boundary location; the fact that any development in West Berkshire is only likely to be after the main part of the development outside the district has substantially progressed; and the requirements for major new infrastructure including a railway station.</p> <p>It is worth noting that the West of Berkshire Spatial Planning Framework, published in December 2016, identifies opportunities for growth. [Figure 3 of that document] shows the growth options proposed for Newbury. The existing Sandford Park allocation is shown in light blue as a “Large Development Area”, with land to west shown as an “Area of Search” (hatched dark blue). A proportion of the SPS proposal is shown as an Area of Search.</p>

## Summary of responses

Comments were divided on this issue. The majority of respondents who considered that there was potential for development in this area were cautious and felt it was dependent on a number of issues which would need to be resolved, some of which were potentially significant. These included the impact on infrastructure, especially the transport network; the amount of infrastructure that development would require; environmental constraints; AWE constraints; impact on green space and the impact on potential mineral sites.

Local communities who felt that would be directly affected by such a development in this area were not in favour of the proposal, citing similar concerns to those identified above.

Whilst acknowledging that development in this location could be seen as a strategic opportunity for authorities in the Western Housing Market Area some respondents felt that the area south of Reading has little, if any, functional relationship with the remainder of West Berkshire and that development in this location would serve to meet the needs of other authorities, namely Reading and Wokingham rather than West Berkshire. Others also felt that it would also undermine the viability and vitality of the existing settlement hierarchy in the District. At the same time, the risks of delivering through such a large strategic site were highlighted by those in the development industry, in particular the long lead in period for such a development. The need for the Plan to be flexible and to include a range of smaller sites across the District which would be able to deliver at an earlier stage in the plan period was also emphasised by many in the industry.

## **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The four Western Berkshire authorities are committed to meeting the housing requirement across the Western Housing Market Area. To this end the Councils have agreed a Memorandum of Understanding which states that the four authorities will continue to work together to ensure that local plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need in Reading.

Should development be considered appropriate at this location, given the strategic nature of the site, any development would be delivered in partnership with Wokingham Borough Council. Reading Borough Council would also be involved in the process.

Should a large scale development go ahead at Grazeley it would require comprehensive masterplanning to ensure that it was delivered in the most sustainable way. Part of this would involve a detailed transport assessment of the existing network. Given that such a large scale development would likely impact significantly on the existing network, developer contributions from the development would go directly to funding any improvements required. A detailed assessment of the green infrastructure would also be required, including the identification of any suitable alternative greenspace (SANG). There would be a need for extensive consultation with AWE Burghfield and the Office for Nuclear Regulation (ONR) to ensure that any development was compatible the facility at AWE Burghfield and delivered in conformity with the Detailed Emergency Planning Zone (DEPZ).

The Council acknowledges that large new settlements are not without their problems and in seeking to identify land for new homes national policy notes the importance of identifying a mix of sites across the District.

As part of the LPR the Council will review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries. A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q6: Do you agree with our assessment of existing planning policies? Please give reasons for your answer. What do you think works well at the moment and what do you think we could do better? Please clearly identify the policy area or specific policy as a sub-heading.**

Number of responses received: 56

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	There currently are no policies for one of the objectives, ie 6 Culture – this is a major gap. Proposals for developing a Cultural Strategy are currently being considered - contact Paul James <a href="mailto:paul.james@westberks.gov.uk">paul.james@westberks.gov.uk</a> For 7 Heritage we will be looking for opportunities to work with Conservation and others to develop a suite of guidance notes for Development Management which Local Plan could refer to
Public Transport Team West Berkshire Council	Regarding policy area 5 in respect of Town Centres and also having regard to Rural Services Centres and Service Villages, I would urge that the review consider how the vitality (in terms of economic and environmental health) of these tiers of settlement can be enhanced and sustained by actively improving access to and from them by sustainable modes i.e. cycling, walking and public transport. Regarding policy area 9 in respect of Transport, it is important that the successor transport-related policies as envisaged adequately reflect the need for sustainable transport modes to continue to deliver reliable access to education, employment, leisure and shopping opportunities within the District, if these are to replace the current saved policy TRANS1.
<b>Statutory consultees</b>	
Stratfield Mortimer Parish Council	Naturally existing policies can be readily identified which help meet the new draft strategic objectives. However if the strategic objectives need reworking and/or adding to then the policies will need to be expanded, changed or added to. Many of the comments on existing policies simply say they will have to be reworked in the light of the developing review. This is of course perfectly reasonable but it does mean that there can effectively be no comment at this stage. One small matter is that in section 2 Housing of Appendix 2 no mention is made of the housing provision contained within the Mortimer NDP. You also ask for comment on what works well and what could be done better. Really our answer revolves around the need to address the issues that are considered important by the public even if it is only to explain why they cannot be carried forward. As part of this the use of plain English with little or no jargon is vital. So very many times in reading this

Respondent	Response
	scoping document, (and even more so in the Sustainability Analysis), do you find yourself saying what on earth does this actually mean!
Thatcham Town Council	Yes, however ensure that West Berkshire Council abide by their own policies, as it was noted that on occasions this has not always been the case. Policy C1- 'Location of New Housing in the Countryside' it states that this is 'subject to a number of exceptions'. More clarity needed on what these exceptions are how many there are.
Greenham Parish Council	<ol style="list-style-type: none"> <li>1. There are a number of policies that particularly concern us in Greenham. <ol style="list-style-type: none"> <li>1. CS16: Flooding. Although Greenham has not suffered recent flooding, the geology is similar to Thatcham.</li> <li>2. Housing ADPP5. Greenham is included within the Newbury area and distinct from Thatcham.</li> <li>3. CS7 &amp; TS3 – Gypsy and traveller accommodation. We experience unauthorised encampments on Stroud Green and parts of Greenham Common.</li> <li>4. CS1 Delivering new homes and retaining the housing stock. We note there is now a new (2016) Strategic Housing Market Assessment (SHMA) to consider, which affects the overall number of new homes the District will need. We are concerned to avoid having more housing as a result of this inflicted on Greenham.</li> <li>5. CS4 Housing type and mix. We are concerned that developers are either receiving the wrong advice from Housing or not following that advice. What 'further clarification' is needed?</li> <li>6. CS6 Affordable Housing – a 'Written Ministerial Statement' and White Paper on the subject are referred to. Details of these need to be given to us before a response can be made.</li> <li>7. CS9 Location and Type of Business Development needs major review in the light of the 2016 Functional Economic Market Area Assessment (FEMA) and Economic Development Needs Assessment (EDNA). Protected Employment Areas (PEAs) will be reviewed. A proverbial 'coach and horses' are being driven through this PEA policy by the Government allowing Permitted Development for converting commercial buildings to residential use, as with Overbridge Square in Hambridge Lane.</li> <li>8. 'Saved Policy' ECON6 Future of Former Greenham Common Airbase needs review, including its planning brief which is now over 20 years old. We are concerned to see that Greenham Trust is seeking a Local Development Order for the Business Park before this policy has been reviewed.</li> <li>9. Saved Policy RL1 Public Open Space Provision in Residential Development Schemes.</li> <li>10. CS5 Infrastructure Requirements and Delivery does need updating to include "stronger linkages to CIL".</li> </ol> </li> </ol> <p>We are <u>not</u> persuaded that TRANS1 (Meeting the Transport Needs of New Developments) is no longer needed as "covered by other transport related policies". This policy deals with levels of parking and provision of 'transport choices': in these respects the policy seems to us to be failing and need strengthening, not dropping.</p>

Respondent	Response
Burghfield Parish Council	We are broadly in agreement with the contents of Appendix 2. However, I have strong reservations about C6 Extension of Existing Dwellings within the Countryside. At present extensions may not exceed a certain percentage of the size of the original. This policy leads to seemingly endless and usually pointless discussion at Planning Meetings and should be replaced by a statement emphasising that any proposed extension should be appropriate in size and design to the setting of the building. In relation to CS15, we are concerned that Government legislation has weakened the ability of the Local Plan to require high standards of energy efficiency in new homes through the Code for Sustainable Homes, and would urge that a way forward is found to ensure that our new plan nevertheless requires high levels of energy efficiency
Burghfield NDP Steering Group	We are broadly in agreement with the contents of Appendix 2. However, we have strong reservations about C6 Extension of Existing Dwellings within the Countryside. At present extensions may not exceed a certain percentage of the size of the original. This policy leads to seemingly endless and usually pointless discussion at Planning Meetings and should be replaced by a statement emphasising that any proposed extension should be appropriate in size and design to the setting of the building. In relation to CS15, we are concerned that Government legislation has weakened the ability of the Local Plan to require high standards of energy efficiency in new homes through the Code for Sustainable Homes, and would urge that a way forward is found to ensure that our new plan nevertheless requires high levels of energy efficiency.
Sport England	In principle I agree with this approach.
Natural England	<p>Any review of the local plan will need to be compliant with paragraphs 115/116 of the NPPF and should also make reference to the Government's 25 year Environment Plan and proposed amendments to the NPPF.</p> <ul style="list-style-type: none"> <li>• For Policy CS17 Natural England would like to see specific reference made to SSSIs/SACs/SPAs within the Policy. We suggest you add a fourth bullet point in order to incorporate this.</li> <li>• Natural England notes that no reference has been made to the protection of Best and Most Versatile (BMV) agricultural land, ancient woodland, veteran trees, protected/priority species or priority habitat within the actual Policy wording itself. These should be named and referenced within Policy CS17.</li> <li>• Development proposals should provide an adequate amount of ecological survey information to be able to assess the extent of any potential adverse effects/impacts on the above features, prior to the determination of the application. Natural England would like to see this included in the Policy CS17 wording.</li> <li>• Reference should be made in Policy CS17 to avoidance, mitigation and compensation where adverse effects on</li> </ul>

Respondent	Response
	biodiversity are identified. Development should be refused if the requirements of this hierarchy are not met. Natural England would like to see this included in the Policy wording.
Historic England	We consider that the Local Plan Review should include a strategic policy for the conservation and enhancement of the historic environment (on the lines of Policy CS19 of the Core Strategy, but specifically for the historic environment and heritage assets therein), and an accompanying detailed development management policy or policies relating to the different types of heritage asset and setting out the considerations that apply to each.
Highways England	We have reviewed the above documents and note that West Berkshire Local Plan Review to 2036 SA Scoping Report mentions capacity of the road network, particularly around Newbury and Thatcham, the A34 and A339 as a key issue. We also note that West Berkshire Local Plan Review to 2036 Scoping Report (February 2018), In Section 9 – Transport, the WBDLP saved policy TRNS3 A34/M4 Junction 13 Chieveley limits further development at A34/M4 J13 to protect the landscape quality of the area. We look forward working with West Berkshire Council to develop proposals that help facilitate planned growth in West Berkshire whilst protecting safe and efficient operation of SRN.
Environment Agency	<p>The following policies are existing local plan policies for West Berkshire local plan you have asked us to review. We have covered those policies that are within our remit.</p> <p>CS16: Flooding We believe you will need to cover these points within your local plan in order to be compliant with the NPPF paragraphs 93, 94 100.</p> <p>The sequential approach referred to should be the sequential test. The sequential approach is usually applied at the site level for sites that have Flood Zones 1, 2 and 3 within them. The sequential test is about avoidance of locating development in flood risk areas. So the sequential test requires a search for reasonably available sites.</p> <p>The updated flood risk policy should reflect the recommendations of the Strategic Flood Risk assessment (SFRA). This is your evidence base for flood risk for your district.</p> <p>Your policy should also include using new development to reduce the causes and impacts of flooding. Your policy should also consider safe access and egress management from sites at flood risk. Your flood risk policy should also include the impact of climate change.</p> <p>CS7: Gypsies, Travellers and Travelling Showpeople This policy says: “In allocating sites, and for the purpose of considering planning applications relating to sites not identified in the relevant DPD, the following criteria will need to be satisfied for sites outside settlement boundaries: Located outside areas of high flooding risk;”</p> <p>You will need to clarify what is considered to be “high flooding risk”. The location of development and its compatibility with the Flood Zones is set out in Tables 1, 2 and 3 of the Planning Practice Guidance. In Table 2 it says that caravans, mobile homes and park homes intended for permanent residential use are in the highly vulnerable category. Highly vulnerable development should not be permitted in Flood Zones 3a or 3b and we would object to any highly vulnerable</p>



Respondent	Response
	<p>development within Flood Zones 3a and 3b. We advise you to make this clear in your local plan in order for your local plan to be consistent with national policy.</p> <p>TS3 Detailed Planning Considerations for Travellers Sites The location of development and its compatibility with the Flood Zones is set out in Tables 1, 2 and 3 of the Planning Practice Guidance. In Table 2 it says that Caravans, mobile homes and park homes intended for permanent residential use are in the highly vulnerable category. Highly vulnerable development should not be permitted in Flood Zones 3a or 3b and we would object to any highly vulnerable development within Flood Zones 3a and 3b. We advise you to make this clear in your local plan in order for your local plan to be consistent with national policy.</p> <p>WBDLP saved policy OVS5 Environmental Nuisance and Pollution Control This policy needs to be more specific in defining the environment. We are interested in the water environment. We would like to know if this policy will be updated and if wording about the prevention of pollution to surface water and groundwater quality can be included. This includes the protection of source protection zones (SPZs). We do not want an infiltration in contaminated land. This may create a pathway for contaminated water to the groundwater aquifers. Water resources should also be protected in terms of the supply of water.</p> <p>We recommend that compliance with the water framework directive's 'no deterioration' and getting to 'good' objectives is included in this policy. Your plan needs to comply with the key objectives of the water framework directive (WFD) which are to ensure growth does not cause a deterioration in the overall status of the receiving water bodies and that growth should not prevent good status or alternative objective being achieved.</p> <p>This will keep your local plan consistent with national planning policy which is NPPF paragraphs 109 and 121.</p> <p>CS15: Sustainable Construction and Energy Efficiency We need an addition to this policy so it refers to the 'higher water efficiency standard' to be used for new dwellings which is 110/l/p/d in the Building Regulations Approved document Part G.</p> <p>CS18 Green Infrastructure We are pleased to see a policy on green infrastructure included in your local plan. However this needs to be expanded to include watercourses and water bodies for 'blue infrastructure.'</p> <p>CS5: Infrastructure Requirements and Delivery We expect to see sewage infrastructure and flood defence infrastructure to be covered within your local plan.</p>
Savills for Thames Water Utilities	No objection
<b>General consultation bodies</b>	
Mid & West Berks Local Access Forum	<p><b>Strategic Objective 8: Green Infrastructure &amp; Healthy Living.</b> More thought needs to be given to the availability &amp; proximity of public open space &amp; networks of public paths (public rights of way) close to where they are needed. Existing public open space and existing public paths networks need to be made accessible without using a car and new off-road paths need to be designed into future developments where they will add to the off-road network. This will reduce car use and increase healthy exercise. Too many people are accessing</p>

Respondent	Response
	<p>public open spaces (such as Greenham Common and Snelsmore Common) by car thus adding to congestion. Off-road Community circuits need to be built in to developments.</p> <p>The requirements of dog walkers need to be addressed particularly.</p> <p>The provision of off-road paths often seems to fall between various stools: housing development policies, highway transport policies and rights of way policies.</p> <p>There needs to be better connection between the policies. Perhaps a specific policy needs to be developed for delivery 'green infrastructure'? The Local Access Forum, a statutory body to advise local authorities &amp; others, might have a role here.</p>
British Horse Society	<p>Inclusion of CS12 Equestrian / Racehorse industry in the current plan was a very welcome addition. We fully support this and call for it to be strengthened and expanded in the new plan based on available evidence &amp; data (see the BHS response to the Sustainability Appraisal).</p>
Reading Gospel Hall Trust	<p>See Q7</p>
The Canal and River Trust	<p>RL5</p> <p>The Canal &amp; River Trust (the Trust) is the guardian of the Kennet &amp; Avon Canal as it runs for 45 km through West Berkshire, passing through major towns such as Newbury and Thatcham and villages such as Hungerford and Kintbury. The Trust promotes the canal as a wildlife corridor, heritage asset, an attractive route for sustainable transport (part of National Cycle Route 4), part of the free local health resources providing informal leisure and recreation, (both on the water and on the towpath). The canal also provides a sense of place and brings economic regeneration opportunities to the area. We are aware that the Council understands the benefits that the canal brings to the area and we acknowledge your support and recognition of these benefits in policy documents as multi-functional green infrastructure, wildlife corridor and heritage asset as well an attractive route for sustainable transport and informal leisure and recreation, both on the water and on the towpath.</p> <p>We note that Appendix 2: Assessment of the relevance and effectiveness of the adopted policies from the West Berkshire District Local Plan 1991 - 2006, the West Berkshire Core Strategy 2006 - 2026 and the Housing Site Allocations DPD 2006 – 2026 states that the principles of WBDLP saved policy Policy RL5 Policy on the Kennet and Avon Canal is anticipated to be carried forward into the Local Plan to 2036 however the Council will consider providing further clarification for development management purposes.</p> <p>The Trust would welcome the opportunity to discuss amendments to Policy RL5. The Trust have recently produced an e-planning toolkit which provides advice on the Waterway proofing of planning policies at local plan level. This can be found <a href="#">here</a>.</p> <p>This document set out a need for to help unlock the economic, environmental and social benefits offered by the waterways and to secure the long-term sustainability and use of waterways as assets for the communities through which they pass. encouraging the use of waterways as tourism attractions in their own right, as well as a way to connect other attractions, and so protect the provision of boat services and facilities where required.</p>

Respondent	Response
	<p>In formulating policies, there are several important waterway factors to be considered.</p> <ul style="list-style-type: none"> <li>• There are different types of waterways, which have different characteristics and principal functions.</li> <li>• Waterways are multi-functional by nature.</li> <li>• Waterways are public assets accessible to local communities free of charge.</li> <li>• waterways, towpaths and water spaces are a part of a wider network that crosses administrative boundaries and cannot be viewed in isolation.</li> <li>• There are particular land use implications and locational requirements arising from the inherent constraint of inland waterways being 'non-footloose' assets.</li> <li>• Development and regeneration can impose burdens and liabilities upon the waterway infrastructure, facilities and environs.</li> <li>• There is a need to provide essential boat services and facilities to support the use of waterways for navigational purposes.</li> <li>• Waterways and towing paths are spaces in their own right, and not just settings or backdrops to development or edges to policy designations.</li> </ul> <p>The Trust would like to work with the Council to help carry out a review of this policy, and in reviewing the plan as a whole we suggest the following questions need to be addressed.</p> <ol style="list-style-type: none"> <li>1. Are waterways recognised as a form of local infrastructure within the Local Plan?</li> <li>2. Are the different types of waterways (i.e. the canal and river sections of the Kennet) and their different characteristics and roles acknowledged?</li> <li>3. Have the spatial and land use implications of waterway related issues, opportunities and proposals identified within the Local Transport Plan, local cycling and walking infrastructure plan, local infrastructure plan, local green infrastructure strategy, and so on, been fully translated into the Local Plan?</li> <li>4. Are all the functions of waterways being fully protected and promoted within the Local Plan?</li> <li>5. Are cross-boundary waterway-related issues and opportunities being fully considered with the adjoining local authorities?</li> <li>6. Is there flexibility within the local planning policy framework to accommodate the inherent constraint of waterways being 'non-footloose' assets?</li> <li>7. Does the policy encourage the unlocking of the economic, environmental and social benefits offered by the waterways?</li> <li>8. Does the proposals map indicate waterways and their corridors?</li> <li>9. Does the policy encourage new developments to: integrate land and water; open up access to, from and along the waterway; explore the added value and use of water space; and view the waterway, towpath and environs as part</li> </ol>
Theatres Trust	<p>In terms of Culture, we recommend that the implantation of a strong policy to protect existing uses such as theatres, cinemas and music venues from unnecessary loss. This policy could also be used to cover other facilities which positively contribute towards the well-being of local people, provide valued local services and opportunities for participation in cultural activities such as pubs and community halls. Such a policy should set out criteria required to</p>

Respondent	Response
	demonstrate redundancy or lack of need for the facility, such as evidence of genuine marketing effort at an appropriate value for the existing use. The Trust can assist with the drafting of such a policy. We would also recommend that Town Centre policies promote new or additional community and cultural uses.
<b>Other stakeholders</b>	
Robert Wallace	Planning is dysfunctional - small changes get a lot of attention whilst serious and serial breaches of permission by developers seem to float through the system. It needs to be faster and more certain
David Parry	My primary concerns relate to the sections C1 and CS1 of the attached Local Plan Review. The document refers to a “settlement boundary review” but I could find no further evidence of or links to it. The intent to potentially change settlement boundaries seems to me to be there in a subtle way. The issue of development outside of the boundary is potentially then not important if the boundary has been moved! I have strong concerns about moving settlement boundaries and development outside of them, in particular in village locations. For Pangbourne (where I am based), I do not believe any further expansion is sustainable and the settlement boundary should remain unchanged.
Christopher Gent	It is important to respect the balance between the smaller villages and communities which have a balance between development and countryside and the major towns of Newbury, Thatcham and Hungerford etc.
William Graham	Housing: Clearly, in the Newbury area WBC has big problems bringing current major planning approvals to fruition, e.g. Sandwell. This is giving developers comfort to successfully ‘try it on’ outside the planned settlement boundaries. In this regard the existing planning policies are not delivering. WBC must find a solution to this problem if it is to retain control. Industry: We query whether WBC is planning to provide enough land and incentives to attract and retain new businesses to Newbury. These will be needed to employ the growing local population planned above.
Neil Richardson	New omission policy needs to allow for appropriate extensions to suitable settlements and development of other well located land for housing to provide for continuity of supply of housebuilding land and to ensure as far as possible that local housing needs are met. 5 yr supply of housebuilding land needs to be available at all times. Policy C1 needs to reflect above.
Julian Worth	Re Policy ECON7 Safeguarding Rail-based Industry at Theale, whilst Theale is primarily a rail aggregates (& cement) terminal, and this traffic will continue to grow, it is important to recognise that consumer goods traffic by rail is also growing rapidly and is now the largest single commodity on Britain's railways at 40% of all volume. West Berks and Reading is a major consuming area for these goods and there is significant interest in using rail to transport consumer goods into the area. Theale is the only location available for modal transfer to road for final delivery and it is important that capability for this is maintained alongside aggregates traffic. It follows that reference to Theale in the Minerals & Waste Local Plan is not sufficient and it should also feature in general economic policies covering non-minerals related issues.

Respondent	Response
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Sulham Estate	<p>Before making any comments in relation to existing planning policies, it is important to note that we do not consider the existing information available within the consultation document to be thorough enough to constitute an ‘assessment’ of policies.</p> <p><u>CS1: Delivery of New Homes and Retaining the Housing Stock</u> We agree that the approach to the delivery of housing should be ‘updated’ to reflect up to date and robust evidence of housing needs. In line with our commentary above we would note that policy CS1 currently delivers a figure which was adopted prior to significant changes in national planning policy and, therefore, is not compliant with the NPPF.</p> <p><u>CS4: Housing Type and Mix</u> We support the intention of the policy which is to provide a wide choice and mix of housing throughout the District to meet needs. We note that the recommendation within the scoping report is for the principles of the policy to be carried forward but to consider providing further clarification for development management purposes. Whilst we would encourage clarification as this would provide additional certainty for developers, we ask the council to ensure that the emerging position incorporates sufficient flexibility for the mix of dwellings sizes to be reflective of the surrounding environment and development pattern.</p> <p><u>All Site Allocations within the HAS DPD</u> The recommendation within the scoping report states that the site allocations will be carried forward or amended depending on the progress on the delivery of the site. In addition, the recommendation states that any allocations which have been delivered will be removed. Whilst we support the removal of delivered sites as allocations as a sensible course of action, we question whether site allocations which have not been delivered will be carried forward without further consideration of their prospects for delivery. In particular, if a site has been allocated for some time and there are no signs that progress is being made in terms of bringing the site forward for development, its deliverability should be reviewed to avoid undermining the Council’s land supply.</p> <p><u>C1 Location of new housing within the countryside</u> Firstly, we consider that the current policy position is overly restrictive and the presumption against development outside of settlement contained within this policy could result in a barrier to the delivery of sustainable development. This is inconsistent with the NPPF and, as such, we consider that this policy position should be relaxed to allow the consideration of sites which adjoin the existing settlement boundary subject to other material considerations within adopted local and national planning policy.</p> <p>Secondly, we note that the assessment of this policy states that as part of updating this policy, there will be a settlement boundary review. We are supportive of this review and encourage the council to give detailed consideration to our client’s site, Land at Hall Place Farm, Tilehurst.</p> <p>In conclusion, given our reservations in relation to the thoroughness of this ‘review’, we reserve the right to comment as draft policy wording is published at later stages of the development of the Local Plan Review.</p>

Respondent	Response
Barton Willmore for Graham Child	<p>Overall it is not considered that policies have been specifically ‘assessed’ as the question suggests, however we anticipate this will follow within a later consultation document. Whilst this therefore concludes our initial policy commentary on behalf of our client for this consultation, we reserve the right to comment in more detail when more depth is added to the proposed policies of the emerging Local Plan.</p> <p><u>Area Delivery Plan Policies</u>  Within Appendix 2 of the Scoping Report, in relation to the Area Delivery Plan Policies we note that the Scoping Report notes the appropriateness of the current spatial strategy will be considered in the first instance, before policies for its delivery are developed. This is in line with comments we have made above and we would urge the Council to consider the age of the currently adopted policies.</p> <p><u>CS1: Delivering New Homes and Retaining the Housing Stock</u>  We note that Appendix 2 considers that the approach to the delivery of housing should be ‘updated’ to reflect the evidence of the SHMA. In line with our commentary above we would note that policy CS1 currently delivers a non NPPF compliant housing requirement and should therefore be completely revisited, to reflect the most up to date position.</p> <p><u>Site Allocations within the HSA DPD</u>  We note that Appendix 2 of the Scoping Report proposes to carry the allocations forward depending on progress and remove those which have been delivered. Our client would support this approach, however we would expect up to date evidence to be prepared to support any sites continued inclusion, to avoid shortfalls in supply.</p> <p><u>C1 Location of New Housing in the Countryside</u>  Our client notes that Appendix 2 of the Scoping Report suggests that the list of settlements will be updated as part of the settlement boundary review, which our client is strongly supportive of and requests their site at Pangbourne Hill is given full consideration during the boundary review for Pangbourne. Notwithstanding this, we consider that the policy as worded is overly restrictive by suggesting a “<b>...presumption against new development outside of settlement boundaries...</b>”. Our client does not consider a presumption against sustainable development accords with the principles of the NPPF and does not allow consideration of those sustainable sites which adjoin the settlement boundary of a settlement within the spatial strategy.</p>
Bewley Homes PLC	<p>Policy CS1: Delivering New Homes and Retaining the Housing Stock  This Policy should also include Engagement with neighbouring LPAs.</p> <p>Policy C1: Location of New Housing in the Countryside  In reviewing settlement boundaries, extensions to existing settlements in appropriate sustainable locations can assist in meeting the borough’s housing need.</p> <p>Policy C2: Rural Housing Exception Policy  This Policy should also take into consideration emerging changes to national policy and supporting opportunities to bring forward exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help facilitate this.</p>

Respondent	Response
	<p>CS5: Infrastructure Requirements and Delivery</p> <p>The recently published Consultation document regarding developer contributions, ‘Supporting housing delivery through developer contributions’, March 2018 and its recommendations will need to be assessed and reflected in this policy.</p>
Boyer Planning for Spitfire Bespoke Homes	<p>Spitfire welcome the Council's review of their existing planning policies and wish to make the following key observations: Policy CS1 relates to the delivery of new homes and retaining the housing stock. The Council intend to update the policy in light of the evidence from the Berkshire SHMA and any amendment to national policy regarding the assessment of housing need. Whilst Spitfire recognise the need to update the policy in light of the SHMA, it is also important to recognise that smaller rural villages like Beenham which do not feature in the settlement hierarchy should be encouraged to grow in order to support their long term future sustainability.</p> <p>Policy C1 relates to the location of new housing in the countryside. The Council intend to prepare a list of settlements to be updated as part of the settlement boundary review. Spitfire consider that there may be cases where development outside settlement boundaries may provide an appropriate solution to meeting sustainable housing growth, particularly in villages and that it is important that settlement boundaries are not drawn too narrowly which will restrict sustainable housing growth in villages.</p>
Mark Carter for Mr R.L.A. Jones	<p><b>2 Housing</b></p> <p>The Respondent considers that the existing method of examining the four main geographical areas of the District is the most appropriate way to examine future policies (and also the settlement hierarchy within those areas)is the most appropriate for the District.</p> <p>Within the North Wessex Downs Area of Outstanding Natural Beauty Lambourn still has a range of services and reasonable public transport provision which also serve the requirements of surrounding communities and these should be reinforced.</p> <p><b>Policy CS1 Delivering new homes</b></p> <p>The Respondent welcomes the Council's commitment to updating the housing requirements of the Plan for a further 10 years, 2026 to 2036 and looks forward to seeing how these are quantified by the Council.</p> <p><b>HSA19 Lynch Lane Lambourn and HSA20 Newbury Road Lambourn.</b></p> <p>The respondent welcomes the Council's commitment to review these two sites “depending on progress of delivery of the site”. However the review should go on to make to clear that where sites have not been delivered or have come up against problems they should be removed as allocations and replaced by sites which are available and deliverable such as the Respondents site at previously identified as LAM007 “land between Folly Road, Rockfel Road and Stork House Drive”.</p> <p><b>CS12 Equestrian and Racehorse Industry</b></p> <p>Thus Policy should be updated and further clarification added as suggested.</p>

Respondent	Response
The Chilton Estate	<p><u>Affordable Housing</u></p> <p>The policy for the provision of Affordable Housing should be flexible and facilitate viability assessment to ensure that land is brought forward for development in situations where the amount of social housing may need to be restricted in order to make the development viable.</p>
Fisher German LLP for Mr Musgrave and Begley	<p>Agree that the current spatial strategy should be reviewed. It is considered that each settlement in the settlement hierarchy should be apportioned growth rather than geographical areas.</p>
Gladman Developments	<p>Gladman have reviewed the assessment of existing planning policies that is contained in Appendix 2 of the West Berkshire Local Plan Review to 2036 Scoping Report. It is however considered that all of these policies will need to be reviewed further in due course in light of the emerging revisions to the National Planning Policy Framework and that a comprehensive approach is taken to the Local Plan Review.</p> <p>In relation to Policy CS1: Delivering New Homes and Retaining the Housing Stock, it is vital that this policy is fundamentally reviewed and that the associated evidence that it is based upon is up-to-date. The approach to setting the housing requirement for the District will be the founding basis of any strategy to enable the objectively assessed housing needs of the area to be met in full.</p> <p>CS2, CS3 and all of the site allocations contained in the HSA DPD will need to be carefully reviewed as part of the preparation of the new Local Plan. Up-to-date evidence on the projected delivery of these housing sites will play an important role in determining the scale of additional allocations that will be required to meet development needs over the extended plan period to 2036. In this regard, it is important that realistic start dates and delivery rates are applied to all sites that are to be retained within the Council's housing trajectory and for all related evidence published to accompany any future Local Plan consultations.</p> <p>Gladman are promoting land at Land off Andover Road, Newbury. This site is well related to a highly sustainable settlement and can be brought forward for residential development as part of an appropriate strategy for the sustainable growth of the area. It is a deliverable site that is available, offers a suitable location for development, and is achievable. There would also be a realistic prospect that housing could be delivered on the site within five years and that the development of the sites would be viable. The site also provides the potential to create a link into Sandford Park and a transport connection across southern Newbury. A copy of the location and extent of the site can be seen at Appendix 1. The current wording of Policy C1 includes a presumption against development. This mechanism prevents the Council from meeting future housing targets and delivering sustainable forms of development. This approach will therefore need to be reviewed as part of the preparation of the new Local Plan to ensure that it is sufficiently responsive to rapid changes in circumstance that can often occur over a plan period. It will also be important for the policies of the Local Plan as a whole to represent a strategy that will meet the requirements of the NPPF in terms of the need to plan for thriving rural communities.</p> <p>Policy CS2 supports rural housing exception sites. Gladman agree that there is a need to update this policy. In addition to</p>



Respondent	Response
	<p>the points raised regarding the lower order settlements within the hierarchy, there may also need to be revisions to support the delivery of starter homes.</p> <p>Policies CS4 relates to housing type and mix. It is considered likely that this policy will need to be reviewed in response to the provisions of the emerging revisions to the NPPF.</p> <p>A range of design related policies are referenced (such as CS14, CS15). There are also a number of other policies, such as CS6: Affordable Housing and those relating to infrastructure requirements that will have an impact on the cost of development in the area. These policies will all need to be considered within the evidence of whole plan viability that is prepared to accompany the new Local Plan in line with the requirements of national policy.</p>
Hallam Land Management	Housing – our comments on the spatial strategy are set out above.
LRM for Bloor Homes & Sandlesford Farm	<p>We are writing on behalf of Bloor Homes and Sandlesford Farm Partnership in response to the current consultation exercise related to the Scope of the Local Plan Review.</p> <p>We note that part of the review process will be to consider existing Core Strategy and Housing Site Allocation DPD policies. In respect of Core Policy CS3 Sandlesford Park, the recommendation in Appendix 2 is that the site allocation is be carried forward or amendments proposed, depending on progress on the delivery of the site.</p> <p>You will be aware that two Outline Planning Applications were submitted by the Bloor Homes/Sandlesford Park and Donnington New Homes for development at Sandlesford Park on the 23rd March 2018.</p> <p>The Sandlesford Park Application seeks planning permission for the following proposed development: up to 1,000 new homes; an 80 bed extra care facility as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House Academy School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150 sq m, B1a up to 200 sq m) and D1 use; the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works.</p> <p>The Sandlesford Park West Application seeks planning permission for the following proposed development: up to 500 new homes (including affordable), a one form entry primary school with land for its expansion to two form entry, replacement and / or expansion land for Park House Academy School, extra care elderly units as part of the affordable housing provision; access from Warren Road and emergency access from Kendrick Road, a recreational facility for families of children with special needs, green infrastructure including children’s play areas and informal open space, pedestrian and cycle links to and through the site, sustainable drainage and other infrastructure. our clients submitted an outline planning application on the 23rd March 2018 for the following proposed development.</p> <p>These applications were accompanied by a Memorandum of Understanding signed by the Applicants.</p> <p>The purpose of the Memorandum of Understanding is to set out the commitment that the Applicants have made in principle to work collaboratively together to deliver the comprehensive development of Sandlesford Park. That commitment will be formalised in a Landowners’ Agreement.</p> <p>A masterplan and other comprehensive plans and documents have been jointly prepared by the Applicants to ensure the coordinated provision of the infrastructure, services, open space and facilities required in association with the planned</p>

Respondent	Response
	<p>housing development, in accordance with adopted planning policy requirements. Whilst the Applicants are submitting separate Outline Planning Applications for the parts of the site in their respective control, these two planning applications will together deliver the holistically planned comprehensive development sought by the local planning authority. This approach is intended to address the concern expressed previously by the Local Authority that development proposals at Sandleford Park could lead to piecemeal development.</p> <p>Sandleford Park is a deliverable site; the environmental information submitted with the current planning applications confirm its suitability consistent with the NPPF's planning principles. The fact that the site is controlled by two housebuilders, Bloor Homes and Donnington New Homes further illustrates that the site will be delivered quickly once planning permission is granted.</p> <p>For these reasons, Sandleford Park should continue to be allocated in the Local Plan review.</p>
Nexus Planning for Pangbourne Beaver Properties	<p>Appendix 2 of the Scoping Report sets out an assessment of the relevance and effectiveness of the adopted policies from the West Berkshire District Local Plan 1991-2006, the West Berkshire Core Strategy 2006-2026 and the Housing Allocations DPD 2006-2026. We respond in connection with a number of specific policies below:</p> <p>Core Strategy Policy CS1 makes provision for the delivery of the overall housing requirement of at least 10,500 net additional dwellings over the period 2006 to 2026. It outlines four categories of land where it expects new homes will be 'primarily' developed. The Council sets out in the Topic Paper that the policy approach to the delivery of housing will be updated in light of evidence from the Berkshire SHMA and any amendment to national policy regarding the assessment of housing need.</p> <p>PBP Ltd supports the proposal for a fully Framework compliant housing target to be provided for within the emerging Local Plan. However, any replacement for adopted Policy CS1 will need to acknowledge that in order to achieve these targets new homes will be provided on greenfield sites adjoining settlement boundaries in all four of the spatial areas.</p> <p>Core Strategy Policy ADPP1 sets out the Spatial Strategy for the district, including a district settlement hierarchy. PBP Ltd do not object to this approach in principle, however adopted Policy ADPP1 also suggests that below the settlement hierarchy, only appropriate limited development will be allowed in the countryside. By contrast, the policy text is clear that 'most development will be within <u>or adjacent</u> to the settlements included in the settlement hierarchy'. In common with Policy CS1 above, the replacement policy for ADPP1 should clarify beyond any doubt that in addition to the urban area, development will need to come forwards on greenfield sites adjoining settlements in the hierarchy, i.e in the 'countryside'.</p> <p><u>HSA 21 Land north of Pangbourne Hill, Pangbourne</u> - This allocation was the subject of a planning permission ref 15/03320/OUTMAJ for 35 dwellings in February 2016. The site owners PBP Ltd discharged the relevant conditions, fulfilled the requirements of the S106 Agreement, including implementing structural landscaping that is now becoming well established and took the site to the market. The site is now being built out by Millgate Homes with a mix of private and affordable units. This demonstrates that PBP Ltd are able to facilitate and deliver good quality development in a sustainable location that will help to enhance the settlement of Pangbourne.</p>
Nexus Planning for Croudace	<p>Appendix 2 of the Scoping Report sets out an assessment of the relevance and effectiveness of the adopted policies from the West Berkshire District Local Plan 1991-2006, the West Berkshire Core Strategy 2006-2026 and the Housing</p>

Respondent	Response
	<p>Allocations DPD 2006-2026. We respond in connection with a number of specific policies below:</p> <p><b>Core Strategy Policy CS1</b> Core Strategy Policy CS1 makes provision for the delivery of the overall housing requirement of at least 10,500 net additional dwellings over the period 2006 to 2026. It outlines four categories of land where it expects new homes will be 'primarily' developed. The Council sets out in the Topic Paper that the policy approach to the delivery of housing will be updated in light of evidence from the Berkshire SHMA and any amendment to national policy regarding the assessment of housing need.</p> <p>Croudace Homes welcome the principle that a fully Framework compliant housing target will be embedded within the emerging Local Plan. However, any replacement for adopted Policy CS1 should also have regard to the fact that new homes will be provided on greenfield sites adjoining settlement boundaries.</p> <p><b>Core Strategy Policy ADPP1</b> Core Strategy Policy ADPP1 sets out the Spatial Strategy for the district, including a district settlement hierarchy. The Council, at Appendix 2 of the Scoping Report, suggests that in connection with policies ADPP1 - 6 that it will consider whether the current spatial strategy for the District is the most appropriate up to 2036. It goes on to suggest that policies for the delivery of the Spatial Strategy will be developed once the principles have been established.</p> <p>Croudace Homes does not object to this approach in principle, however adopted Policy ADPP1 also suggests that below the settlement hierarchy, only appropriate limited development will be allowed in the countryside. By contrast, the policy text is clear that 'most development will be within or adjacent to the settlements included in the settlement hierarchy'. Nonetheless, conflict with Policy ADPP1 was a point levelled against the Henwick Park appeal scheme. In common with Policy CS1 above, the replacement policy for ADPP1 should clarify beyond any doubt that in addition to the urban area, development will need to come forwards on greenfield sites adjoining settlements in the hierarchy, i.e in the 'countryside'.</p> <p><b>HSA DPD Policy C1</b> Policy C1 of the HSA DPD seeks to restrict housing supply through the identification of settlement boundaries, outside of which there is a presumption against development. However, it should be noted that the HSA DPD is limited to delivering the out-of-date Core Strategy housing requirement.</p> <p>Delivery of a Framework compliant housing target will require settlement boundaries to be redrawn again, to include current greenfield sites on the edge of settlements. Croudace Homes therefore does not object to the principle of the policy being carried forward into the emerging Local Plan to 2036 provided a fully Framework compliant is embedded in the Plan, including greenfield sites on the edge of sustainable settlements. As noted elsewhere, this should include the land at Henwick, Park, which is a sustainable location for growth.</p>
Pegasus Planning Group for Donnington New Homes	<p>Policy ADPP1 Spatial Strategy should be retained, as the current strategy is the most appropriate way to deliver the homes that are needed in West Berkshire over the next plan period.</p> <p>As stated in the Scoping Report, Policy CS1: Delivering New Homes and retaining the Housing Stock should be updated to include the latest evidence on housing supply, and the Objectively Assessed Need (OAN) for West Berkshire should be</p>

Respondent	Response
	<p>determined using the government's new standardised method. The principle of allocating greenfield sites adjoining settlements to accommodate the required housing in all four spatial areas should be retained.</p> <p>The principles of Policy CS4: Housing Type and Mix should be carried forward into the Local Plan to 2036. The policy should be added to, to specifically outline the number of adaptable homes for older people that are required across West Berkshire, and to establish a principle in favour of developments that provide significant numbers of adaptable homes for older people. This would be in line with the Draft Revised NPPF, which places increased importance on the delivery of adaptable homes for older people.</p> <p>All HSA Policies should be reviewed, and any allocations which have been delivered should be removed. Allocations which have not been delivered should be examined, to determine whether there is a realistic prospect of them coming forward during the next plan period. If there clearly isn't, then these sites should be removed from the plan. New housing sites should then be allocated to replace them and meet the full OAN as calculated in Policy CS1.</p> <p>Policy C1 Location of New Housing in the Countryside should be reviewed to determine whether the existing settlement boundaries are the most appropriate. Settlement boundaries should be redrawn where appropriate, to include new allocations on the edges of existing settlements in line with the Spatial Strategy.</p> <p>The lack of policies regarding culture should be addressed, and a specific policy regarding tourism, and the benefits of encouraging tourism through new development, should be created.</p> <p>The principles of Policy CS18: Green Infrastructure should be carried forward into the Local Plan to 2036. If the definition of green infrastructure is clarified, it should continue to include open space and allotments, as these are very important components of the overall green infrastructure in West Berkshire. The Policy should be updated to more clearly state the presumption in favour of developments that provide significant amounts of green infrastructure.</p>
Pegasus Planning Group for Donnington New Homes	<p>Principles of Policy CS16: Flooding should be carried forward into the Local Plan to 2036, but further information should be added regarding the benefits of schemes which provide towards flood risk mitigation measures, and can manage and reduce the flood risk on site and the surrounding areas, including especially where the flood risk to existing homes is reduced.</p> <p>Policy ADPP1 Spatial Strategy should be retained, as the current strategy is the most appropriate way to deliver the homes that are needed in West Berkshire over the next plan period.</p> <p>As stated in the Scoping Report, Policy CS1: Delivering New Homes and retaining the Housing Stock should be updated to include the latest evidence on housing supply, and the Objectively Assessed Need (OAN) for West Berkshire should be</p>

Respondent	Response
	<p>determined using the government's new standardised method. The principle of allocating greenfield sites adjoining settlements to accommodate the required housing in all four spatial areas should be retained.</p> <p>All HSA Policies should be reviewed, and any allocations which have been delivered should be removed. Allocations which have not been delivered should be examined, to determine whether there is a realistic prospect of them coming forward during the next plan period. If there clearly isn't, then these sites should be removed from the plan. New housing sites should then be allocated to replace them and meet the full OAN as calculated in Policy CS1.</p> <p>Policy C1 Location of New Housing in the Countryside should be reviewed to determine whether the existing settlement boundaries are the most appropriate. Settlement boundaries should be redrawn where appropriate, to include new allocations on the edges of existing settlements in line with the Spatial Strategy.</p>
Pegasus Planning Group for Wasing Park Estate	<p>Existing Policy CS10: Rural Economy supports economic growth in rural areas and encourages appropriate farm diversification. The Scoping Report confirms that this policy is to be updated along with saved policies ENV16 and ENV19 related to farm diversification and the reuse and adaption of rural buildings. This approach is supported – Policy CS10 should be updated to align with Paragraphs 84 and 85 of the Draft Revised NPPF as set out above.</p> <p>Pegasus Group act on behalf of the Wasing Estate in relation to their land interests. The Wasing Estate is working to develop a long-term business plan and vision plan with the objective of making the estate as sustainable as possible, and these emerging proposals currently include:</p> <ul style="list-style-type: none"> <li>• An organic farm, providing local food produce to the Estate's own markets – their wedding venue, a restaurant, hotel, and local box schemes;</li> <li>• A wellbeing operation which is part of the Estate's aim to become a leading hospitality centre in the UK;</li> </ul> <p>Liaising with local villages and communities to ensure that the Estate is working to help with infrastructure needs such as schooling, the aging population, housing need, pubs and village centres;</p> <ul style="list-style-type: none"> <li>• The need for more housing to staff the growing business at Wasing Estate, preferably flats or terraced homes, ultimately to house another 50 – 100 people;</li> <li>• The need to encourage tourism in rural areas and to promote the tourism industry throughout West Berkshire.</li> </ul> <p>Policy CS10 should be updated to include reference to Paragraphs 84 and 85 of the Draft Revised National Planning Policy Framework, and reflect the importance of the rural economy.</p> <p>Land under the control of the Wasing Estate has a clear role to play in ensuring a prosperous rural economy in West Berkshire. The Local Plan Review should include a new policy to facilitate the delivery of the emerging Wasing Estate Plan.</p>
Pro Vision for Cala Group and Wates Developments	<p>All policies will need to be reviewed to ensure that they accord with the revised NPPF and PPG. We have the following Policy specific comments:</p> <ul style="list-style-type: none"> <li>• ADPP1 : Spatial Strategy. In principle we support the existing Spatial Strategy (see our comments above). The role and</li> </ul>

Respondent	Response
	<p>function of Rural Service Centres and Service villages should be reviewed. To accord with the draft NPPF, they should be identified as being suitable to accommodate further sustainable development that will enhance or maintain their viability and vitality. Whilst the growth potential of the smaller villages will be more limited, there is no justification to, as a matter of principle, restrict development to infill only. By the same token, in the countryside, infill should be acceptable where it would not result in the development of isolated homes (as Policy CI now allows).</p> <ul style="list-style-type: none"> <li>• CSI: Delivering New Homes and Retaining the Housing Stock. See our comments above about assessing local housing needs. Local policies will need to identify non strategic sites and development opportunities. All settlement Policy boundaries will need to be reviewed.</li> <li>• CS3: Sandford Strategic Site Allocation. This allocation should be deleted unless the LPA is satisfied that there is robust evidence that is developable.</li> <li>• CS4: Affordable Housing. Will need to be updated in light of the draft NPPF. Housing allocations and delivery policies will need to be Viability Tested.</li> <li>• CI Location of New Housing in the Countryside. Should be updated generally and specifically to: 1) extend the categories of development allowed as an exception to the general presumption to include the redevelopment of the sites of redundant rural buildings (similar to the former ENV20 policy of the West Berkshire District Local Plan) and 2) enable the sustainable growth and expansion of all types of business in rural areas through conversion and well-designed new buildings.</li> <li>• C2 Rural Housing Exception Policy. Should be generally updated and informed by Viability Testing. Guidance about the scope and extent of "facilitating" market housing should be provided.</li> <li>• CS8: Nuclear installations - AWE Aldermaston and Burghfield. We support the proposed review. This Policy currently fails to apply the assessment of risk proportionately to individual sites.</li> <li>• CS9 and 10: Business and Rural Economy - will require comprehensively reviewing to accord with the revised NPPF.</li> <li>• ENV19: Re-use and adaptation of rural buildings. Should be reviewed and merged with Policy C4.</li> <li>• CS18: GreenInfrastructure: The review needs to clarify the definition of GI. The current list of land use typologies can be (and has frequently been) applied to any area of undeveloped land.</li> <li>• CS6:Infrastructure. The review and updating of this policy will require full Viability Testing.</li> </ul>
Pro Vision for Rootes Trustees	<p>All policies will need to be reviewed to ensure that they accord with the revised NPPF and PPG. We have the following Policy specific comments:</p> <p>ADPPI : Spatial Strategy. In principle we support the existing Spatial Strategy (see our comments above). The role and function of Rural Service Centres and Service villages should be reviewed. To accord with the draft NPPF, they should be identified as being suitable to accommodate further sustainable development that will enhance or maintain their viability and vitality. Whilst the growth potential of the smaller villages will be more limited, there is no justification to, as a matter of principle, restrict development to infill only. By the same token, in the countryside, infill should be acceptable where it would not result in the development of isolated homes (as Policy CI now allows).</p>

Respondent	Response
	<p>CSI: Delivering New Homes and Retaining the Housing Stock. See our comments above about assessing local housing needs. Local policies will need to identify non strategic sites and development opportunities. All settlement Policy boundaries will need to be reviewed.</p> <p>CS3: Sandleford Strategic Site Allocation. This allocation should be deleted unless the LPA is satisfied that there is robust evidence that is developable.</p> <p>CS4: Affordable Housing. Will need to be updated in light of the draft NPPF. Housing allocations and delivery policies will need to be Viability Tested.</p> <p>CI Location of New Housing in the Countryside. Should be updated generally and specifically to: 1) extend the categories of development allowed as an exception to the general presumption to include the redevelopment of the sites of redundant rural buildings (similar to the former ENV20 policy of the West Berkshire District Local Plan) and 2) enable the sustainable growth and expansion of all types of business in rural areas through conversion and well-designed new buildings.</p> <p>C2 Rural Housing Exception Policy. Should be generally updated and informed by Viability Testing. Guidance about the scope and extent of "facilitating" market housing should be provided.</p> <p>CS8: NuclearInstallations - AWE Aldermaston and Burghfield. We support the proposed review. This Policy currently fails to apply the assessment of risk proportionately to individual sites.</p> <p>S9 and 10: Business and Rural Economy - will require comprehensively reviewing to accord with the revised NPPF.</p> <p>ENV19: Re-use and adaptation of rural buildings. Should be reviewed and merged with Policy C4.</p> <p>CS18: GreenInfrastructure: The review needs to clarify the definition of GI. The current list of land use typologies can be (and has frequently been) applied to any area of undeveloped land.</p> <p>CSS:Infrastructure. The review and updating of this policy will require full Viability Testing</p>
Pro Vision for Greenham Trust	<p>The Trust has the following comments on the existing Development Plan policies. Saved policy ECON6 – Future of the Greenham Common Airbase.</p> <p>The Trust welcomes a review of the current policy position for the former air base. Saved policy ECON6 relates to the 'Technical Area' of the former airbase, previously known as New Greenham Park in the Local Plan. The site is now known as 'Greenham Business Park'.</p>

Respondent	Response
	<p>A clear and positive policy framework is very important for the continued success of the business park. It would be appropriate, however, for new policy to recognise that the park has already established as a mixed-use park including elements outside of the traditional business use classes. It is appropriate for the Local Plan to continue to focus on these business uses, but also recognise that a wider range of use is typically associated with 21st century business parks. For example, limited amounts of small scale convenience retail can help to sustain business parks and reduce the need for employees to leave the site for basic daily facilities and services.</p> <p>In reviewing the “role and function” of the park, it is important to recognise that Greenham Business Park represents one of, if not the, key employment areas in the district. The revised policy position should positively reflect this and provide a clear framework for managing growth and evolution of the park through the plan period.</p> <p>It is agreed that review of the saved policy should also involve a review of the supplementary guidance for the former airbase. It may be that this guidance is no longer fit-for-purpose. Policy CS9 Location and type of business development</p> <p>‘New Greenham Park’ is acknowledged to be a strategically important employment site under this adopted policy of the West Berkshire Core Strategy (2006 to 2026). The policy stated that subsequent Development Plan Documents would consider whether this and other established employment sites should be given a protected status. The Trust presumes that the LPA sees the Review of the Local Plan to be the appropriate opportunity for this review.</p> <p>In principle, the Trust would welcome a strategic level policy that noted the strategic importance of Greenham Business Park followed by a site-specific development management policy.</p> <p>Local Development Order</p> <p>There is an extant planning permission for comprehensive redevelopment of the park dating back to the MoD’s disposal of the former airbase in the 1990s. Implementation of this permission has been slow, however, due to the inflexibility of the approved but speculative masterplan. Regeneration of the site has therefore been more ad hoc through a series of individual planning permissions driven by market demand, some of which have been implemented or partially implemented.</p> <p>In terms of the scale of regeneration permitted, over half of the permitted floorspace is still to come forward. Greenham Business Park therefore represents a significant opportunity for the effective reuse of previously developed land in line with national policy (as set out in our comments under Question 2).</p>



Respondent	Response
	<p>The Trust is working closely with West Berkshire Council to prepare a Local Development Order (LDO) for the site. The objective of the LDO is to introduce a more flexible development management framework to allow the park to respond to market demand more effectively. It also involves addressing all the key planning issues upfront thereby simplifying the planning process as and when suitable development opportunities come forward. This scheme of simplified planning can make a significant difference between new business and job opportunities coming to West Berkshire or going elsewhere in the UK or internationally and can also be a very positive tool for supporting existing businesses and organisations so that they can grow and adapt here without needing to relocate with the loss of jobs from the local economy.</p> <p>The Draft Revised NPPF continues to encourage LPAs to use LDOs in appropriate locations (paragraph 52). The benefits of an LDO specifically at Greenham Business Park are recognised by the Council's Economic Development Officer.</p> <p>Although an LDO no longer must be linked to adopted policy (Planning Act 2008 Section 188[1]), it would be preferable for the LDO, once formally adopted by the Council, to be underpinned by the Local Plan.</p> <p>P1 Residential Parking for New Development</p> <p>The Trust welcomes the review of parking standards, including addressing parking for non-residential development.</p> <p>Parking standards should offer some flexibility to ensure that appropriate levels of vehicle and nonvehicular parking are provided for the precise function, or range of functions of the non-residential development.</p>
Pro Vision for Audley Group	<p>We support the proposed review and update of saved policy ENV27 (Development on existing institutional and education sites in the countryside).</p> <p>Given that West Berkshire is a largely rural district, it is important the revised Local Plan continues to include positive policies for supporting residential institution sites in the countryside.</p> <p>As noted in our response to Question 2, residential institutions make a significant contribution to sustaining the local rural economy. As well as supporting the evolution of existing schemes, the revised Local Plan should also support opportunities for new schemes in appropriate locations where redevelopment opportunities may arise. For example, it would be appropriate to support the reuse of existing rural sites for residential institutions which might otherwise come under pressure for development as market housing or worse might even be abandoned, with inevitable detriment to local rural communities.</p> <p>Residential institutions such as those provided by Audley are low-impact developments that are well suited to rural areas. For example, Audley retirement communities typically have noticeably lower levels of traffic as the sites offer excellent social and recreational facilities and there is a low level of car ownership.</p> <p>The revised Local Plan should provide clarification of the saved policy that residential institutions are not only related to education but are increasingly also related to elderly care communities.</p>

Respondent	Response
	<p>A positive policy is also needed to ensure that existing residential institution sites, such as Audley’s elderly care community at Inglewood, can evolve and adapt to changing requirements. For example, established rural sites often have opportunities for appropriate extension to existing buildings or effective reuse of other previously developed land within their curtilage to improve the accommodation and facilities, or even for justified and well-reasoned limited greenfield expansions. It should not be necessary for such proposals to be treated negatively and wholly as ‘exceptions’ to policy. Rather, a criteria -based policy should provide a clear framework for managing these opportunities. By positively planning for the evolution of existing sites, the revised Local Plan will help to reduce the pressure for new greenfield development sites in the rural area.</p>
<p>Pro Vision for Rivar</p>	<p>Do you agree with our assessment of existing planning policies? Please give reasons for your answer. What do you think works well at the moment and what do you think we could do better? Please clearly identify the policy area or specific policy as a sub-heading.</p> <p>All policies will need to be reviewed to ensure that they accord with the revised NPPF and PPG. We have the following Policy specific comments:</p> <ul style="list-style-type: none"> <li>• ADPPI : Spatial Strategy. In principle we support the existing Spatial Strategy (see our comments above). The role and function of Rural Service Centres and Service villages should be reviewed. To accord with the draft NPPF, they should be identified as being suitable to accommodate further sustainable development that will enhance or maintain their viability and vitality. Whilst the growth potential of the smaller villages will be more limited, there is no justification to, as a matter of principle, restrict development to infill only. By the same token, in the countryside, infill should be acceptable where it would not result in the development of isolated homes (as Policy CI now allows).</li> <li>• CSI: Delivering New Homes and Retaining the Housing Stock. See our comments above about assessing local housing needs. Local policies will need to identify non strategic sites and development opportunities. All settlement Policy boundaries will need to be reviewed.</li> <li>• CS2: Newbury Racecourse Strategic Site Allocation. At a strategic or local policy level, consideration should be given to a potential extension of the existing site allocation.</li> <li>• CS4: Affordable Housing. Will need to be updated in the light of the draft NPPF. Housing allocations and delivery policies will need to be Viability Tested.</li> <li>• CI Location of New Housing in the Countryside. Should be updated generally and specifically to: 1) extend the categories of development allowed as an exception to - the general presumption to include the redevelopment of the sites of redundant rural buildings (similar to the former ENV20 policy of the West Berkshire District Local Plan) and 2) enable the sustainable growth and expansion of all types of business in rural areas through conversion and well-designed new buildings.</li> <li>• C2 Rural Housing Exception Policy. Should be generally updated and informed by Viability Testing. Guidance about the scope and extent of "facilitating" market housing should be provided.</li> <li>• CS8: Nuclear Installations - AWE Aldermaston and Burghfield. We support the proposed review. This Policy currently fails to apply the assessment of risk proportionately to individual sites.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• CS9 and 10: Business and Rural Economy - will require comprehensively reviewing to accord with the revised NPPF.</li> <li>• ENV19: Re-use and adaptation of rural buildings. Should be reviewed and merged with Policy C4.</li> <li>• CS18: GreenInfrastructure: The review needs to clarify the definition of GI. The current list of land use typologies can be (and has frequently been) applied to any area of undeveloped land.</li> <li>• CS6: Infrastructure. The review and updating of this policy will require full Viability Testing.</li> </ul>
RPS for AWE	<p>1. AWE agree that Policy CS8 requires updating in light of the current review of the Detailed Emergency Planning Zones. In the interest of public safety, and in response to increasing demand for housing land in close proximity to the Inner Land Use Planning Consultation Zones at both sites, the Detailed Emergency Planning Zones (DEPZs) set out in Policy CS8 should be updated and fully enforced. The distances for the Inner Zone (Aldermaston 0-1.5km; Burghfield 0-1.5km), Middle Zone (Aldermaston 3-5km; Burghfield 1.5-3km) and Outer Zone (Aldermaston 5-8km; Burghfield 3-5km) will be reviewed in line with the updated DEPZs and enforced by the Council under Policy CS8. AWE continue to fully support Policy CS8 in advising that residential development in the Inner Land Use Planning Consultation Zones is likely to be refused planning permission by the Council where the ONR has advised against that development. This is especially relevant when considering the potential large-scale development south of Reading in the vicinity of AWE Burghfield.</p> <p>2. Policy CS9 recognises the AWE sites as strategically important for the District’s economy. AWE agree that policy CS9 should be updated and request that a bespoke designation consistent with the importance of AWE to the local economy (and national security) is made. The Council will be aware of AWE’s willingness to jointly progress a Local Development Order for their sites at Aldermaston and Burghfield, and a meeting is currently being arranged to start this process. The supporting text to policy CS9 raises the potential for “bespoke designation”; this is an option AWE would like to pursue through the LDO mechanism, supporting the business development potential of these strategically important employment sites.</p>
Savills for Englefield Estate	No specific comment is made at this stage, although in many cases where it is noted that ‘consider providing further clarification for development management purposes’ this is welcomed.
Joy Schlaudraff	It should be for easier for people to get their land allocated for housing. The council should not pick and choose the land which is offered, but allocate it all, as long as acceptable in planning terms.
Tetlow King Planning Ltd for Rentplus UK Ltd	Our comments relate to the proposed review of <b>Policy CS6</b> on the provision of affordable housing, which is timely following a significant number of national policy consultations and in particular the release on 5 March of the draft proposed changes to the National Planning Policy Framework, which is widely expected to take effect later this year. The rent to buy model has been recognised within the proposed changes to the Framework. The draft changes set out the Government’s commitment to supporting people in saving for a deposit while paying a below-market rent; this is intended to help many more working households into home ownership. Part (d) of the proposed definition of affordable housing is set out below:

Respondent	Response
	<p>1. d) <b>Other affordable routes to home ownership:</b> is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.</p> <p>A substantial level of funding set aside for the delivery of affordable housing through Homes England (formerly Homes and Communities Agency) was recently returned to Treasury, unspent; negotiation on planning application requirements, planning obligations and discharge of planning conditions are key constraints on the speed of the planning system in building out consented schemes. The Council should look to follow the course set by national policy by ensuring its housing policies include provision for rent to buy housing as part of the affordable housing mix.</p> <p>Policy CS6: Provision of Affordable Housing should be amended to reflect the wider definition of affordable housing set out in the changes to the NPPF currently subject to consultation, and as set out above now to include 'other affordable routes to home ownership'. In response to Question 6, our recommendations for amendments to the policy are set out here:</p> <p>In order to address the need for affordable housing in West Berkshire a proportion of affordable homes will be sought from residential development. The Council's priority and starting expectation will be for affordable housing to be provided on-site in line with Government policy(48).</p>
Turley for Berfeld Limited	<p>CS16: Flooding</p> <p>We consider that there should be explicit recognition in the policy that some type of development is acceptable in flood risk areas, and that the aim of the policy should be to safeguard against inappropriate development in flood risk areas. "Inappropriate development" is defined as all conventional residential dwellings and other structures that are not flood proof. Flood proof dwellings never flood, do not make flooding worse elsewhere, provide safe access and egress and do not increase the burden on emergency services and are supported by a site specific flood risk assessment.</p> <p>C1: Location of New Housing in the Countryside</p> <p>We objected to the wording of Policy C1 when it was proposed as part of the Housing Site Allocations DPD on the grounds that went beyond the policy approach adopted in the Core Strategy.</p> <p>Area Delivery Plan Policy 1 of the Core Strategy sets out the Council's spatial strategy. The policy begins: "Development in West Berkshire will follow the existing settlement patterns and comply with the spatial strategy set out in the Area Delivery Plan policies of this document based on the four spatial areas". It continues in the second paragraph: "Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below, and related</p>

Respondent	Response
	<p>to the transport accessibility of the settlements (especially by public transport, cycling and walking) their level of services and the availability of suitable sites for development. The majority of development will take place on previously developed land”.</p> <p>The spatial strategy therefore rightly places the focus for new development on “following” existing settlement patterns, seeking to locate “most” development within or adjacent to settlements and on “previously developed land”. It does not however, expressly prevent new residential development outside existing settlements and in doing so, allows a degree of flexibility to consider proposals that lie outside of settlement boundaries but that may nonetheless be considered sustainable development.</p> <p>It is regrettable that Policy C1 was adopted in its current form in the HSADPD and in common with our comments above under questions 3 and 4, a more flexible approach should be allowed for. Such restrictive wording does not allow for less orthodox developments or the changes that may lead us to different ways of living and working in the future and we therefore recommend the Council take a more, not less, flexible approach.</p> <p>CS18: Green Infrastructure</p> <p>We support the Council’s desire to revisit the wording of this policy to ensure that it reflects the health and environmental benefits of green infrastructure, and should recognise the benefits of living in an environment that creates such opportunities.</p>
Turley for A2dominion Housing Group	We consider that the existing policies should be reviewed based on updated evidence and changes in national planning policy.
Turley for Commercial Estates Group	Policies ADP1 to ADP6 will need to be reconsidered in light of any revisions to the spatial strategy which emerge as a consequence of the Local Plan Review. Accordingly, we will comment on the efficacy and wording of any new (and/or revised) policies, as may be proposed when the Draft Plan is published for consultation.
Turley for North East Thatcham Consortium	<p>Overall, the Consortium’s position is that policies should be reviewed in light of the evidence base produced by the Council and the national planning policy context in place as the Local Plan Review progresses (bearing in mind the likely publication of the revised Framework later in 2018). This is considered to be of particular relevance to the following policy areas.</p> <p><i>Housing policies</i></p> <p>There is a clear requirement to review policies relating to overall housing provision to ensure that the emerging Local Plan Review meets the housing needs of West Berkshire in full. It is agreed that reference should be made to the Berkshire (including South Bucks) Strategic Housing Market Assessment and its conclusion that housing needs are significantly higher at 665 dwellings per annum than the existing Core Strategy provides for (525dpa), or than have been annually</p>

Respondent	Response
	<p>delivered to date on average (500dpa). This evidences the increase in housing provision needed in West Berkshire to support anticipated job creation, which requires a more marked increase in the labour force than would be expected to result from a continuation of historic demographic or development trends.</p> <p>Such an elevation in the overall level of housing provision will also have implications for the spatial distribution of growth in West Berkshire, and the Consortium therefore agrees that the appropriateness of the spatial strategy should be kept under review as the plan-making process evolves. Reflecting their status in the settlement hierarchy, the urban areas of Newbury, Thatcham and the eastern settlements close to Reading will be expected to play an important role in meeting the higher need for housing evidenced in the district.</p> <p>Policies relating to housing type and mix must also be reviewed to ensure that the type and size of housing delivered responds to evidenced needs. The SHMA highlighted the significant need for homes with three or more bedrooms, which is expected to account for most (62%) of the market housing needed in the HMA and over half (55%) of its overall housing needs. While the Consortium considers that a revised policy should not be overly prescriptive, this clearly highlights the importance of identifying a balanced portfolio of sites capable of accommodating the family housing needed in West Berkshire and the wider housing market area over the emerging plan period.</p> <p><i>Economic policies</i></p> <p>The Core Strategy drew upon economic evidence produced in 2007, thereby reflecting the significantly different economic context which predated the recession. The Inspector noted the availability of some updated evidence produced in 2011 – which continued to be influenced by the recession and subsequent recovery – and highlighted the Council's intentions to update this evidence to inform the Site Allocations and Delivery DPD. While this update to the economic evidence base was commissioned and published, the scope of the Site Allocations and Delivery DPD was subsequently reduced to focus exclusively on housing sites.</p> <p>It is therefore imperative that the Local Plan Review fully reflects the latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA) on the land required to support future employment growth, and identifies sites capable of meeting the concluded need for up to 75.2ha of additional employment land over the period to 2036. The Local Plan Review must adopt a positive and sufficiently flexible approach to create the conditions through which investment can be attracted and businesses' needs are met.</p> <p><i>Town centre policies</i></p> <p>The Consortium agrees that the policy approach to retail and town centres must be updated to take account of the latest available evidence, namely the Western Berkshire Retail and Commercial Leisure Assessment produced in 2016. This acknowledges proposals for the redevelopment of Thatcham town centre, in order to strengthen and enhance its role as a shopping destination. The importance of the extant permission for the redevelopment of the Kingsland Centre is noted within the evidence, with a requirement for additional comparison floorspace in the town were this permission to expire without implementation.</p> <p>The Local Plan Review can contribute towards creating the conditions through which this investment can be made, realising the opportunity to regenerate the town centre and achieve the vision for a strengthened and vibrant retail centre. Through the sustainable growth of Thatcham over the plan period, a growing residential population can be</p>

Respondent	Response
	<p>accommodated, increasing patronage and footfall and generating additional expenditure for local shops and businesses. Thus housing growth in Thatcham has a key role to play in supporting the town centre's regeneration.</p> <p><i>Infrastructure policies</i></p> <p>The Local Plan Review must take a sufficiently progressive view as to how infrastructure provision and the accommodation of housing needs can be realised in parallel. In Thatcham for example where the provision of new housing will be a pre-requisite of supporting the regeneration of the town, a strategic view must be taken of the full infrastructure needs associated with growth to ensure that they can be addressed and delivered.</p> <p>Directing additional development towards Thatcham would enable the provision of a range of infrastructure which would serve the needs of not only new developments but also provide opportunities to address strategic and long standing social infrastructure deficiencies in the town.</p> <p><i>Site specific policies and allocations</i></p> <p>The Consortium does not consider that site specific policies should simply be retained unless built out. The Consortium considers that allocations should be removed if they are unlikely to be achieved / delivered during the period to 2036.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The Gerald Palmer Eling Trust has the following comments to make on the Council's assessment of existing policies:</p> <p><b>Housing policies</b></p> <p><b>Policy C1 Location of New Housing in the Countryside:</b> The Council's comment on this policy in the column entitled 'recommendation' is: '<i>Principles of this policy anticipated to be carried forward into the Local Plan to 2036. List of settlements to be updated as part of settlement boundary review.</i>' The commitment contained in this wording of carrying out a settlement boundary review is supported. However, it is considered that more information needs to be provided about the scope of the review and the methodology that will be followed and that this must be subject to public consultation at an early stage in the process so that there is a consensus about the methodology to be applied. As the current settlement boundaries were defined in the West Berkshire District Local Plan 1991 – 2006 they are now seriously out of date. As a result in some cases development has taken place in the interim which is outside of the current settlement boundary and encloses undeveloped land that is still currently outside of the settlement boundary. This is the case, for example, at Hampstead Norreys, where the existing dwelling at Red Cottage and adjoining land is still outside the settlement boundary, despite the adjoining land to both east and west already having been developed as indicated on the attached site location plan L01. Logically this land should therefore be within the settlement boundary. A review of settlement boundaries is also fundamental to determining the capacity of West Berkshire to accommodate the housing need identified in the Strategic Housing Market Assessment and its distribution across the District. The settlement boundary review should therefore be a priority for the Local Plan review.</p> <p><b>C2 Rural Housing Exception Policy:</b> The comment that consideration is to be '<i>given to permitting such schemes adjacent to Rural Service Centres, as well as those rural settlements lower down the settlement hierarchy,</i>' is supported. This is currently the situation under policy C2 and it is vital that this continues to be the case in order to satisfy the pressing need for more affordable housing in rural settlements.</p>

Respondent	Response
	<p><b>Policies C4 Conversion of Existing Redundant Buildings in the Countryside to Residential Use; C5 Housing Related to Rural Workers; C6 Extension of Existing Dwellings within the Countryside; C7 Replacement of Existing Dwellings; C8 Extension of Residential Curtilages:</b> In the case of all these policies the proposal is to carry the principle of the policy forward, with the comment '<i>Consider providing further clarification for development management purposes,</i>' with no identification of what the further clarification might be. It is considered that these policies have worked well, particularly in enabling a new use to be found for redundant rural buildings, which often have heritage value and make an important contribution to the landscape. The principle of carrying these policies forward is therefore strongly supported and it is considered that they do not need to be subject to any significant change.</p> <p><b>Economy</b></p> <p><b>CS10: Rural Economy:</b> This policy together with 'saved' West Berkshire District Local Plan 1991 – 2006 <b>policies ENV.16 on Farm Diversification and ENV.19 on the Re-Use and Adaption of Rural Buildings</b> currently provide a positive framework for rural business developments, which is strongly supported as it fully accords with national planning policy contained in paragraph 28 of the National Planning Policy Framework. This states that: <i>'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</i></p> <ul style="list-style-type: none"> <li>• <i>support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;</i></li> <li>• <i>promote the development and diversification of agricultural and other land-based rural businesses;</i></li> <li>• <i>support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and</i></li> <li>• <i>promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.'</i></li> </ul> <p>This positive approach to rural businesses is also supported by the North Wessex Downs AONB Management Plan, which states in paragraph 8.3 that: <i>'The North Wessex Downs Partnership believes that promoting and supporting local enterprise is a key part of conserving and enhancing the character and special qualities of the area. Local businesses are likely to:</i></p> <ul style="list-style-type: none"> <li>• <i>employ local people;</i></li> <li>• <i>provide services to improve the local quality of life;</i></li> <li>• <i>spend money locally;</i></li> <li>• <i>promote community cohesion; and</i></li> <li>• <i>have a smaller environmental footprint (by reducing the transportation of goods from across communities).</i></li> </ul>



Respondent	Response
	<p><i>People like to live in a high quality environment. This attracts some businesses as it helps them retain staff. Support for small local businesses will provide local jobs and enhance the rural economy. For example, fast broadband is crucial for a healthy rural economy and we will work with relevant agencies to secure such infrastructure.'</i></p> <p>The Council's recommendation is that the policy approach is 'to be updated, alongside ENV.16 and ENV.19, and other policies relating to the rural economy.' It is important that as part of this process the current positive approach is retained in order to ensure the prosperity of the rural economy of West Berkshire in accordance with Government and North Wessex Downs AONB Management Plan policies.</p>
Woolf Bond Planning for Donnington New Homes	<p>We support the carrying forward of Policy C4 (Conversion of Existing Redundant Buildings in the Countryside to Residential Use) in the Local Plan Review. This policy provides an appropriate policy that acknowledges the benefit of converting existing redundant buildings to public and private beneficial uses, consistent with paragraphs contained in the emerging NPPF discussed above.</p>
WYG for Donnington New Homes	<p>Adopted Core Strategy Policy CS3 (July 2012) allocates land at Sandleford Park as a Strategic Site allocation, for the phased delivery of up to 2,000 dwellings. Supporting text confirms that, "some flexibility in delivery is anticipated, with at least 1,000 dwellings proposed to be delivered by 2026, but with the ability to increase this amount if monitoring or changing circumstances indicate that this is necessary". This flexibility in approach is supported, particularly given that the policy was adopted in 2012 and that housing requirements have increased since this time. Land at "Sanfoin" to the west of Sandleford Park was allocated in the subsequent Housing Site Allocations DPD which was adopted in 2017, and this site now forms part of the Sandleford Park West proposals which are the subject of a current outline planning application. Donnington New Homes welcomes the proposal at Appendix 2 of the Local Plan Scoping Report to carry forward the allocation at Sandleford Park, particularly the recognition that amendments can be included in the new local plan to reflect current circumstances.</p> <p>In March 2018, planning applications are being submitted by Donnington New Homes and by Bloor Homes / Sandleford Farm Partnership, together proposing the development of up to 1,500 homes at Sandleford Park, with associated infrastructure including new roads, schools, a country park, local centre and open space, as well as providing a site for the local charity, Swings and Smiles, to deliver a facility providing support to local families with children with special needs. Together, these two planning applications comprise a cohesive and comprehensive package of development proposals for Sandleford Park which meet the Council's policy requirements. As proposed, the dwelling numbers fall below the threshold of "up to 2,000 dwellings" set out at Policy CS3 and this is largely due to a desire to provide a high-quality development, with associated infrastructure and with a high provision of open space. The applicants have sought to avoid an overly-developed scheme, which while maximising numbers, would not deliver the scale of green infrastructure proposed through these two, complementary applications. However, on the basis of the submitted planning applications referred to above, construction of the first phases of the Sandleford Park development is now likely to commence during 2019.</p> <p>Significantly, the Sandleford Park South development would also facilitate the provision of a southern link road, serving both the proposed extension and the wider Sandleford Park development and alleviating the section of the A343 Andover</p>

Respondent	Response
	<p>Road through Wash Common. The proposal for this route is shown at Appendix A of this representation in the Sandleford Park Extension and Wash Common Relief Road “Call for Sites” submission. The concept masterplan is repeated here for reference: (see attached document).</p> <p>In response to the question set out at 6.1 of the Local Plan Scoping Report, “<i>Do you agree with our assessment of existing planning policies</i>”, DNH supports the recommendation to include Policy CS3, but also requests that a <b>new policy</b> is introduced to <b>allocate the Sandleford Park South site</b> to deliver up to 500 additional dwellings to be served by the additional section of the Sandleford Park main access road between the A343 at Sandpit Hill and the southern edge of the existing Sandleford Park allocation at New Warren Farm. It is also proposed that this section of new road is added to Policy TRANS1A (Road Schemes) which sets out key transport schemes and protects identified land on the Policies Map for such schemes.</p> <p>The Sandleford Park West illustrative masterplan submitted with the current outline application has been designed to retain the flexibility for primary and secondary school provision to cater for the needs arising from Sandleford Park South, and the main access route has been designed to facilitate its southerly extension to Wash. It is important to note that the submitted planning application for Sandleford Park West includes reserve education campus land. The SPW planning application generates a requirement for the provision of a 1 Form Entry Primary School, but additional land has been reserved for the expansion of this school to 2 Form entry. Expansion/replacement land (1.6ha) is also reserved for Park House School (adjacent to the PHS campus southern boundary). This is in addition to the provision required by the Core Strategy allocation, should this be necessary in order for the school to expand appropriately and in a plan led manner.</p>

## Summary of responses

The majority of respondents agreed with the Council’s aim to assess existing planning policies, including where there will be clarification for development management purposes (such as Core Strategy CS4). Some site promoters said that there was not enough information to be able to make an assessment of policies.

Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies. This includes the needs of the racehorse and equestrian industry, flooding, heritage assets, transport, water infrastructure, sport and recreation, community/cultural facilities, the Kennet and Avon Canal, and the expansion of Theale rail terminal.

There was general consensus that appropriate extensions to sustainable settlements may be a way forward. Some respondents, notably from the general public, were concerned with a settlement boundary review, and were keen to ensure a balance is retained between smaller villages and the main towns in the District. The housing number going forward needs to be based on up-to-date evidence, and would need to include greenfield sites.

New Greenham Park and the Atomic Weapons Establishment were keen to see a new policy or amendment to CS9 to reflect the strategic importance of both areas of employment.

There was a suggestion that there should be a review of all site allocations in the Housing Site Allocations DPD, including a review of sites which have not been delivered. One respondent was concerned that the delay in delivering sites such as Sandleford was having the effect of developers submitting schemes for unallocated land outside of settlement boundaries (e.g. North Newbury).

Other comments received focus on including a policy for the redevelopment of redundant rural buildings, similar to Local Plan Policy ENV20; the clarification of green infrastructure; expanding Local Plan Policy ENV27 to include residential institutions for elderly care; that Core Strategy Policy CS16 should recognise any public benefits of development through flood risk management and mitigation; for Core Strategy CS6 to take into account the changes to the definition of affordable housing outlined in the NPPF; and for a review of retail centres to take into account available evidence.

### **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). Where respondents have highlighted specific concerns they will be taken forward through the development of either strategic or local policies as appropriate.

The importance of an adequate, up to date and relevant evidence base is acknowledged. As part of the LPR the Council will review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries. A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q7: Are there any other policy issues that you think should be considered as part of the review of the Local Plan? If so, what are they and tell us why you think they should be included.**

Number of responses received: 56

Respondent	Response
<b>Internal</b>	
Environmental Health West Berkshire Council	<p>I note that policies OVS5 Environmental Nuisance and Pollution Control and OVS6 Noise Pollution OVS6 are to be reviewed. The PPG documents referred to (23&amp;24) are no longer valid and the Council's approach to pollution &amp; noise should be reviewed. In particular noise policy should be updated to reflect terminology /approach of Noise Policy Statement for England and NPPF. I would refer you to document entitled 'ProPG Planning and Noise' developed by the Institute of Acoustics, ANC and the CIEH  <a href="http://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Main%20Document.pdf">http://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Main%20Document.pdf</a>            Air Quality Policy - Just to note that the protection and improvement of local air quality is a priority for the Council and we are currently developing a 'planning and air quality guidance' document. A draft version of this has already been circulated internally for comment.</p>
Public Transport Team West Berkshire Council	No, I do not consider that there are any other policy issues to be considered as part of the Local Plan review.
<b>Statutory consultees</b>	
West Berkshire Health and Wellbeing Board	<p>West Berkshire's Health and Wellbeing Board have recently met and asked me to request that the West Berkshire Local Plan Review to 2036 considers the role that good design can play in the long term health and wellbeing of residents and workers in West Berkshire.            In addition, the Health and Wellbeing Board would welcome the opportunity presented by the West Berkshire Local Plan Review to 2036 for a new policy to be included for significant developments to include health and wellbeing opportunities, both hard (new health facilities) and soft (formal public open space) in their designs.            We also welcome the opportunity to work closely with you and your team in the production of the plan.</p>

Respondent	Response
Bracknell Forest Council	<p>In relation to the Localism Act and the Duty to Co-operate (and based on the strategic priorities listed in para. 156 of the National Planning Policy Framework), Bracknell Forest Council would ask you to take the following into account in preparing your Local Plan Review to 2036 document:</p> <ul style="list-style-type: none"> <li>• Representatives from this Council should be involved in any discussions relating to strategic issues (including consideration of possible joint evidence studies) as enlarged below;</li> <li>• The homes and jobs needed in the area; <ul style="list-style-type: none"> <li>○ Discussions on housing need, including affordable, following joint working on the evidence base relating to the Strategic Housing Market Assessment and the West of Berkshire Spatial Planning Framework. With regards to Gypsy and Traveller provision, Bracknell Forest Council has published a new Gypsy and Traveller Accommodation Assessment following the change in definition in Annex 1 of the</li> </ul> </li> <li>• The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat); <ul style="list-style-type: none"> <li>• <ul style="list-style-type: none"> <li>○ Representatives from this Council should be involved if any development is of such a size/significance (including minerals and waste provision), that it could result in implications for infrastructure provision within Bracknell Forest, in particular</li> </ul> </li> </ul> </li> <li>• Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including <ul style="list-style-type: none"> <li>○ Part of your Borough is seemingly within 5 km and within 7km of the Thames Basin Heaths SPA. The implications are that developments up to 7km may need to provide mitigation measures. It is advisable that you contact Natural England (NE) on this matter. It should be noted that the Habitat and Species Regulations have been updated, with the most recent regulations published in 2017. Bracknell Forest Council is currently agreeing a methodology with NE regarding the air quality assessment which will be undertaken as part of the HRA for the Bracknell Forest Local Plan which will include an in-combination assessment. We look forward to sharing information on this issue in the future with West Berkshire Council, as appropriate.</li> </ul> </li> </ul> <p>The 'Bracknell Forest Local Plan' (BFLP) provides the long term spatial vision and development strategy for the Borough up to 2034. A consultation on the draft BFLP, including draft SA, draft HRA and draft Infrastructure Delivery Plan took place during February/March this year. It is hoped to arrange a Duty to Co-operate meeting with the relevant bodies to discuss issues raised, over the next couple of months.</p> <p>We welcome the opportunity for on-going discussion relating to the preparation of the above documents, and would be willing to attend meetings, workshops, respond to consultation material as appropriate, and ask to be kept informed of any future consultations.</p>
Wokingham Borough Council	Thank you for consulting Wokingham Borough Council on the Local Plan Review to 2036 Scoping Report and SA Scoping Report for West Berkshire. WBC has reviewed these documents and does not wish to make any comment at this

Respondent	Response
	stage. We welcome this local plan review, and look forward to future progress on the Sustainability Appraisal and future consultations for the new plan.
Basingstoke & Deane Borough Council	Thank you for consulting Basingstoke and Deane Borough Council on the Scoping Report for a review of the Local Plan. We would like to offer our support for the review and its longer timeframe and also support the continuation of discussions through the Duty to Cooperate, particularly in relation to housing provision, transport infrastructure, environment and resource efficiency, the North Wessex Downs AONB, and also developments near licenced nuclear installations. We look forward to working with you further as the Plan progresses.
Cumbria County Council	Thank you for inviting Cumbria County Council to comment. This is an officer level response. We have no comment to make at this early stage in the process but please do keep us informed of progress as, given our shared experience of hosting a nuclear facility, we would be particularly interested to see your waste planning policies with regard to radioactive waste. Regarding the Duty to Cooperate, we are not aware of any strategic issues to raise at present but if you wish to discuss any matters going forward as the Plan progresses, please do not hesitate to contact me on the details below.
Stratfield Mortimer Parish Council	This has largely been dealt with via the comments on the other questions but in summary are:- <ul style="list-style-type: none"> <li>• Consideration of likely technological and social changes during the plan period.</li> <li>• Greater consideration of the use of policies to foster community spirit</li> <li>• Greater consideration of the use of policies to foster the health and wellbeing of the residents of the area</li> <li>• Far more consideration of what an ageing population will require in terms of development and social/health support</li> <li>• A realistic infrastructure plan which melds far more elements of public policy and private provision together than is the case at present.</li> <li>• A strategy for coping with the likely shortfall in provision and demand for infrastructure of all sorts in the future.</li> <li>• A strategy for meeting increased expectations not just in quantitative terms but also in the quality of provision</li> <li>• Improvements to biodiversity</li> </ul>
Holybrook Parish Council	We note that very little attention or positive action has been given to general infrastructure; roads, GP surgeries, leisure facilities, educational establishments etc. With 280 dwellings designated for Holybrook Parish and a further 285 planned for the neighbouring Pincents Hill (amounting to over 500 dwellings in a concentrated area) there will be, approximately, an additional 1000 cars per day using just one junction on the already over-burdened A4 Bath Road. It is noted that the report speaks of encouraging the use of cycling, public transport and walking. However, the current cycle-ways are very narrow making them dangerous for users, particularly along the A4 and across junction 12 of the M4 motorway. Currently, any residents in Holybrook Parish who wish to access West Berkshire Council's leisure facilities would have to

Respondent	Response
	<p>spend an unacceptable amount of time using public transport. The nearest sports centre is Willink which has no direct bus route from the Parish.</p> <p>It is widely acknowledged that we are an aging population. Therefore, walking any distance can prove difficult for many people. Consequently, senior citizens rely on their cars for shopping and access to leisure. The Parish Council fully supports a greener future and the provision for this but it must be acknowledged that the dependency on the car will not go away.</p> <p>The need for improved services to match the housing quota defined by Central Government, is imperative. Our roads in the east of the district are overburdened and some positive action needs to be taken to address the situation. The quality of life for our residents will be severely impaired if housing is not matched by infrastructure improvements.</p>
Burghfield Parish Council	<p>No.</p> <p>Housing design - there needs to be more consideration of the environmental impact of the house design and contraction as well as the energy required for the house to function (heat light etc) in the future.</p> <p>General infrastructure within and around the new developments should include</p> <ul style="list-style-type: none"> <li>• Well lit pavements for walking and cycle routes to minimise car use, these should encourage safe walking and cycling to both the area centre and the adjacent centres. For example it should be safe to walk and cycle to / from Burghfield to Mortimer, Theale and Reading if the number of homes is being increased.</li> <li>• This is particularly important with the inadequate parking proposed per bedroom (this needs increasing)</li> </ul> <p>Parking spaces for all new housing should have electric supply for charging cars in all parking spaces (whether house allocated or not).</p>
Burghfield NDP Steering Group	No.
Network Rail	<p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>Level Crossings</p> <p>Any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety</p>

Respondent	Response
	<p>will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocation would have on the safety and operation of these level crossings. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of development added over time</li> <li>• By the type of crossing involved</li> <li>• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing</li> <li>• By developments that might impede pedestrians ability to hear approaching trains</li> <li>• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing.</li> </ul> <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway.</p> <p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.</p>
Savills (UK) Ltd for Thames Water Utilities Ltd	<p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: <b><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></b></p>



Respondent	Response
	<p>Paragraph 162 of the NPPF relates to infrastructure and states: <b>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</b></p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <b>“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</b></p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply and network infrastructure both on and off site;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>In light of the above we recommend the new Local Plan include the following policy/supporting text:  <b>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE POLICY</b>  <b>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</b></p> <p>Proposed new Policy text to support the above policy: <b>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company [Thames Water] as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</b></p>

Respondent	Response
	<p><b>SUDS</b></p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SUDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> <li>• improve water quality</li> <li>• provide opportunities for water efficiency</li> <li>• provide enhanced landscape and visual features</li> <li>• support wildlife and</li> <li>• provide amenity and recreational benefits.</li> </ul> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: <b><i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></b></p>
Sport England	<p>The economic, social and health benefits of sport:  <a href="https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/</a>  <a href="https://www.sportengland.org/research/benefits-of-sport/health-and-benefits-of-sport/">https://www.sportengland.org/research/benefits-of-sport/health-and-benefits-of-sport/</a>  <a href="https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/</a></p> <p>These three areas can create sustainable, healthy, cohesive and robust communities. Sport is often overlooked in particular in its economic benefits to local economies.</p>
Historic England	<p><b>Appendix 1: Considerations for Development Management policies</b></p> <p><b>Archaeology</b></p> <ul style="list-style-type: none"> <li>• The preservation of scheduled monuments and other nationally important archaeological sites and their settings; and</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• The preservation, in situ, of other archaeological remains or, in those cases where this is not justifiable or feasible, provision is made for excavation recording; and</li> <li>• Requiring that an appropriate assessment and evaluation is submitted as part of the planning application in areas of known or potential archaeological interest.</li> <li>• Appropriate publication/curation of findings</li> </ul> <p><b>Listed Buildings</b></p> <ul style="list-style-type: none"> <li>• Ensuring that proposed alterations, extensions or changes of use to listed buildings, or development in their vicinity, will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings;</li> <li>• Taking measures to ensure that neglected listed buildings are appropriately repaired and re-used.</li> </ul> <p><b>Conservation Areas</b></p> <ul style="list-style-type: none"> <li>• Ensuring that development within or which would affect the setting of a conservation area will conserve or enhance those elements which contribute to its special character or appearance;</li> <li>• Safeguarding spaces, street patterns, views, vistas, uses and trees which contribute to the special character or appearance of that conservation area.</li> <li>• Where they exist, reference to the fact that Conservation Area Appraisals will be used to guide development in those areas.</li> <li>• Where up-to-date Conservation Area Appraisals are not available developers are required to submit character statements to demonstrate the impact of the development upon their character and appearance of the conservation area.</li> </ul> <p><b>Historic Parks and Gardens</b></p> <ul style="list-style-type: none"> <li>• Safeguarding features which form an integral part of the special character or appearance of the Park or Garden;</li> <li>• Ensuring that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration;</li> </ul> <p><b>Locally important heritage assets</b></p> <ul style="list-style-type: none"> <li>• Setting out definitions of what constitutes a locally important or ‘non-designated’ heritage asset.</li> <li>• Providing criteria for their assessment for development proposals, including alteration and extension, and demolition.</li> <li>• Ensuring applicants are required to demonstrate significance and setting out information requirements for applications.</li> </ul>

Respondent	Response
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the scoping reports
Environment Agency	<p>We strongly recommend the inclusion of the following policy in order to be consistent with national planning policy -</p> <p><b>Watercourse policy</b></p> <p>We expect to see a policy included for the conservation and enhancement of river corridors to ensure that your local plan is deliverable and compliant with National Planning Policy Framework (NPPF) paragraphs 99, 109, 114 and 117. For this policy we would like to see an identical policy to that of the adopted Wycombe District Council Policy DM15 of the Delivery and Site Allocations Plan adopted 2013.</p> <p>This policy says:</p> <p>“DM15 Protection and Enhancement of River and Stream Corridors</p> <ol style="list-style-type: none"> <li>1. Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.</li> <li>2. Development should seek to conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design.</li> <li>3. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting (including on sites specifically identified in High Wycombe town centre).</li> <li>4. Development proposals adjacent to or containing a watercourse should provide or retain a 10m buffer between the top of the river bank and the development, and include a long term landscape and ecological management plan for this buffer.”</li> </ol> <p>Site allocations policies</p> <p>We expect to the site allocations polices to address onsite constraints such as flood risk, main rivers and their ecological buffer zones, sewage capacity and the impact on the receiving watercourses, groundwater quality and contaminated land including past historic uses. Source protection zones, pollution prevention and climate change.</p> <p>All of these constraints are likely to have an impact on the deliverability of development on a site.</p>
<b>General consultation bodies</b>	
CPRE Berkshire	It is time WBC had a proper policy on Light Pollution, alongside OVS6 on Noise Pollution, they are equally important. WBC has performed badly compared to some other LAs, (eg RBWM) despite it being largely in the AONB with Dark Sky areas. Complaints get passed 'environmental health' and nothing gets done. It is time the subject came squarely under Policy and Development Control.

Respondent	Response
	<p>A particular problem area is lighting of gateways where there is a huge range of installations, some good some very bad - lights that point up to the sky from ground level or higher, lights that shine out to the road and dazzle people trying to walk along a lane in th dark, or in some cases passing drivers.</p> <p>We suggest the main principles here should be:  gateway lights should illuminate the ground, not the sky or the highway.  Excellent examples of best practice may be seen on the walls of the car-park of the Hampstead Norreys community shop, and the gates of Walcroft at Kiln Corner, Upper Basildon: such examples are worthy of inclusion in the WBC 'Quality Design' document.</p> <p>Another widespread problem is the cheap high-power so-called 'spotlights' put up that illuminate a wide area. They should not illuminate other peoples property or the highway. There should be powers to require screening panels to limit spread sideways, as well as above so that the light source cannot be seen from afar. The same applies to high power sports ground lighting, but here, at last WBC has achieved reasonable control with planning applications.</p>
Mid & West Berks Local Access Forum	<p>We refer to the Forum's policy statement on development:  <b>Policy relating to Planning Applications for Housing, Roads, Minerals &amp; Waste sites and other industrial sites</b></p> <p>The Forum is a statutory body set up under the CROW Act 2000 to advise local authorities and other bodies on public access, including the improvement of public rights of way for recreational and utility purposes.  The CROW Act 2000 required all local authorities to produce a Rights of Way Improvement Plan (ROWIP) which can be found on the relevant local authority website. The plan has a number of objectives which relate to maintaining and improving the public rights of way network and also the development of new and improved public access generally.  The Forum will consider the following when commenting on plans.  That, the development:</p> <ol style="list-style-type: none"> <li>i. does not adversely affect existing public rights of way or other public open spaces in the area;</li> <li>ii. offers equivalent, or improved, diversion of existing public right of way affected by the development;</li> <li>iii. provides increased and / or improved off-road access to the existing public rights of way network in the area, and to existing and new facilities, open spaces and the countryside;</li> <li>iv. provides increased and /or improved off-road access for as many different user groups as possible, that is, pedestrians, cyclists, equestrians and disabled users;</li> <li>v. Provides paths which are definitive, rather than permissive, and are therefore added to the definitive map and statement;</li> <li>vi. Conforms to the British Standard '<i>Gaps, Gates and Stiles</i>' and Defra's guidance "<i>Good practical guidance for Local Authorities on compliance with the equalities act 2010</i>".</li> </ol>
British Horse Society	<p>Not as long as the new local plan includes an Equestrian / Racehorse objective which includes racing <b>and</b> non-racing activities (these include professional, semi-professional and recreational activities - see the BHS response to the Sustainability Appraisal).</p>

Respondent	Response
Forestry Commission South East and London Area Office	<p><b>Local Plans and ancient woodland – Forestry Commission approach</b></p> <p>The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</p> <p><b>A summary of Government policy on ancient woodland</b></p> <p><a href="#">Natural Environment and Rural Communities Act 2006</a> (published October 2006).</p> <p><b>Section 40</b> – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p><a href="#">National Planning Policy Framework</a> (published March 2012).</p> <p><b>Paragraph 118</b> – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.</p> <p><a href="#">National Planning Practice Guidance</a> – Natural Environment Guidance. (Published March 2014)</p> <p>This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a <a href="#">non-statutory consultee</a> on “<i>development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in <a href="#">Natural England’s Ancient Woodland inventory</a>), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings</i>”</p> <p>It notes that <b>ancient woodland is an irreplaceable habitat</b>, and that, in planning decisions, <b>Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework</b>. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p><a href="#">Standing Advice for Ancient Woodland and Veteran Trees</a>. (Published April 2014)</p> <p>The Forestry Commission has prepared joint <a href="#">standing advice</a> with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.</p> <p>The Standing Advice website will provide you with links to <a href="#">Natural England’s Ancient Woodland Inventory</a>, <b>assessment guides</b> and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. <b>Case Decisions</b> demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our <a href="#">website</a>.</p> <p><a href="#">The UK Forestry Standard</a> (3rd edition published November 2011).</p>

Respondent	Response
	<p><b>Page 24</b> “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs).  <a href="#">Keepers of Time</a> – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).  <b>Page 10</b> “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”.  <a href="#">Natural Environment White Paper “The Natural Choice”</a> (published June 2011)  <b>Paragraph 2.53</b> - This has a “renewed commitment to conserving and restoring ancient woodlands”.  <b>Paragraph 2.56</b> – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.  <a href="#">Biodiversity 2020: a strategy for England’s wildlife and ecosystem services</a> (published August 2011).  <b>Paragraph 2.16</b> - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).  Renewable &amp; low carbon energy  The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.  Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.  Flood risk  The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.  The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.  In the wider planning context the Forestry Commission encourages local authorities to consider <a href="#">the role of trees in delivering planning objectives</a> as part of a wider integrated landscape approach. For instance through:</p> <ul style="list-style-type: none"> <li>• the inclusion of <a href="#">green infrastructure</a> (including <a href="#">trees and woodland</a>) in and around new development; and</li> <li>• the use of locally sourced wood in construction and as a sustainable, <a href="#">carbon lean fuel</a></li> </ul>
Reading Gospel Hall Trust	<p>Provision of adequate community facilities is vital to the social health of every local community. Yet the existing local plan to 2026 is silent as to a district-wide policy, apart from vague reference to 'infrastructure' in policy CS5.  The only mentions of 'community facilities' as such in the plan are:</p> <ul style="list-style-type: none"> <li>• P27 ADPP2 In Newbury existing cf’s will be protected [nothing about applications for additional facilities]</li> <li>• P27 para 26 in Thatcham provision of cf s will be encouraged, but only within the town centre</li> </ul>

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	<ul style="list-style-type: none"> <li>• P36 ADPP5 In the north Wessex Downs area limited development including of swill be allowed</li> <li>• P46 para 13 In Sandford Park cfs associated with the new housing are mentioned.</li> </ul> <p>This leaves substantial settlements like Theale and Tadley, not to mention the many villages, with no policy guidance. We think this should be rectified.</p> <p>Use class DI covers a wide range of community uses, with widely varying spatial and locational requirements. As such it is not easy for Councils to allocate land for these uses, nor to make generic guidance. Nevertheless, we would encourage the Council to consider including policy wording which states that where a local need is demonstrated sympathetic consideration will be given.</p> <p>One relevant factor to take into consideration is that some community facilities are promoted by charitable organisations reliant on voluntary funding, and unable to compete with house builders and others for prime sites. Where promoters can demonstrate a history of failed attempts within settlement boundaries, many Councils allow for use of sites outside settlements, and we would encourage West Berkshire to do the same.</p> <p>Recent Government-commissioned advice to Councils on provision of places of worship is pertinent. Appended to this statement is a publication <i>Faith Groups and the Planning System: Policy Briefing</i>, which was commissioned by DCMS. This document, issued as Government advice to LPAs, covers the needs of all faith groups, and makes recommendations as to a wide range of policy changes needed in the changing social environment of Britain.</p> <p>Recommendations 13 to 15 [The Planning Framework] are most relevant.</p> <ul style="list-style-type: none"> <li>• 13. ... <i>local authorities should prioritise protecting space for social infrastructure including places of</i></li> <li>• <i>Local authorities should ... 'move towards a proactive mode of needs provision'</i></li> </ul> <p>We would encourage the Council to engage with this policy briefing.</p> <p>Reading Gospel Hall Trust has a growing congregation in the area, and we anticipate that we will have need for further halls in the Plan period, most likely in the eastern part of the District.</p>
West Berkshire Spokes	<p>West Berkshire Spokes see the Local Plan as an opportunity to commit further investment for sustainable forms of transport to make cycling and walking more attractive for the benefit of all West Berkshire residents.</p> <p>There are a number of proposals for new improved cycle routes that have been identified in partnership with West Berkshire Cycle Forum that will help to mitigate the effects of development. These include proposals to improve the condition of the Kennet &amp; Avon Canal towpath (not just in the vicinity of the racecourse, but across the entire district), creation of new quietways to and from developments (i.e. Sandford and North Newbury) and bring up to standard the existing cycle network as per the 2016 Cycle Working Group Report.</p> <p>Furthermore the restoration of a shared use path on the old Newbury to Didcot Railway Line would provide opportunities for active travel to help make outlying villages such as Long Lane, Curridge, Hermitage, Hampstead Norreys and, possibly in the future, Compton, more sustainable locations for development. The first phase of making the dismantled rail track accessible to the public has begun this year and is expected to be complete by 2019. More investment and commitment to a vision to open the entire route would provide a community asset for West Berkshire residents that would become a tourist attraction in its own right, as well as an off-road cycle track that links into existing routes and attractions</p>



Respondent	Response
	such as Oxford, the Ridgeway and Stonehenge. We would like to see the Local Plan safeguard the route for this purpose in order to prevent further sections from being lost to development.
<b>Other stakeholders</b>	
Neil Richardson	As above, need for new policy to provide flexibility in ensuring sufficient housebuilding land brought forward for varied local housing needs throughout the Plan period. Potential Omission Sites. Specific sites potentially suitable as extensions to settlements or for housing development in well located areas can be identified in due course.
Philip John Williams	Why are you sending me this? It's all too detailed and would take an age to assimilate. I tried but you have to drill down into the information and get bored and annoyed the further you get into it. Please someone use some common sense pay a bit more of our money and have it shortened so it can be readily understood.
Liz Rigarlsford	I think it is brilliant that you keep us informed!!! Although not able to attend the meeting, you more than compensated for my absence. Thank you, I will watch with interest this project, which I personally would not approve, merely for the infrastructure that is not able to take much more traffic along the A4!
Robert Wallace	No mention of a revised Minerals policy No consideration of the economic and financial restraints on the Council
David Stubbs	I would say from the outset that for most ordinary households and residents, the prospect of reading, understanding and responding to planning regime documentation is not something which encourages transparency or accessibility. While fully appreciating the need for subject specific terminology and legal frame working, the knowledge that local opinion is therefore difficult both to assess and then to incorporate – and that once the consultation period closes, both the local authority and the many vested interests from the development community will then proceed to ‘interpret’ the local plan to their own desired outcomes does not inspire either great trust or great interest in engaging. Without either the specialist knowledge or ability to drill down deeply into the implications of the local plan review, I would restrict my comments to the following broad principles:- <ul style="list-style-type: none"> <li>· The recent economic climate, austerity and swingeing cutbacks in local services MUST be reflected in the ability of the local environment to contain and sustain large scale development.</li> <li>· The stated policy of central government to ‘build’ the country out of recession places undue pressure on local authorities who have not the infrastructure or resources to simply grant planning permission to fall in with national need and the local plan review MUST have the courage to strengthen West Berkshire council’s ability to retain proper control both of what is feasible and of the wishes of the local electorate.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>· West Berkshire Council have showed some resolve in standing up to developers who refuse to submit applications which meet local requirements (such as the fractured approach being taken by the vying applications for Sandford). The plan review must acknowledge and strengthen this position.</li> <li>· Where delay to the desired number of new build starts each year is caused by the local authority properly rejecting applications which are not submitted in line with local planning guidance, the plan review must give the strength to resist both national government and developer pressure to grant 'catch up' approvals simply to hit targets!</li> <li>· The local plan MUST reflect that the local infrastructure, (road capacity and condition, bus services, reductions in waste collection, libraries, social services, NHS provision etc. etc.) is itself a constraint on the ability for new development to be 'sustainable'.</li> <li>· Where developers wish to make significant profit from their sites, the development must itself contribute proportionally to meeting the additional infrastructure needs that it will load onto the surrounding environment – and the plan must give the local authority the backbone to resist developers pleas that the proportion of social housing, school provision, brownfield remediation, play space or whatever will make the proposal unviable.</li> <li>· New developments MUST meet the requirements of policies such as the travel plan in preventing development which depends on vehicle transport and encouraging foot and cycle movement.</li> <li>· The plan review should encourage the priority use of infilling and brownfield sites – despite these not being the easy choice for developers - before permitting large scale greenfield development out of town with all the loss of countryside and traffic generation these entail.</li> <li>· The conversion of office and business premises into residential through permitted development should be resisted.</li> </ul>
Christopher Gent	Wherever possible it is important to respect existing settlement boundaries. Development should be focussed on rebuilding in existing development locations where possible.
William Graham	No. If WBC gets the future of housing and industry right, leisure, health and cultural facilities will naturally develop.
Julian Worth	Stronger links need to be made with the Minerals & Waste Local Plan as this covers important and potentially disruptive issues such as extraction, which impact significantly on the subjects considered in the Local Plan, notably landscape and water. In general, extraction in new areas should be opposed - alternative sources of aggregates are available, notably through the Theale rail depots, and despoilation of West Berks can be avoided by making greater use of these alternatives
David Lister	<p>The Sustainability Goals are ambitious and include objectives to 'mitigate.. climate change' and 'minimise demand for energy and other resources'. In Appendix 2 of the Local Plan the only policy related to climate change is CS16: Flooding which includes flood risk assessment.</p> <p>The Spatial Development Plan to 2036 must take into account the broader impacts of Climate Change and the change in energy availability in the next 20 years. National policy already recognizes the phasing out of fossil fuels in this time frame which is a result of fossil fuel depletion and carbon dioxide emissions.</p>

Respondent	Response
	<p>The development plan should have strategic objectives related to the generation of renewable energy (such as wind, solar, and biogas from anaerobic digestion) and objectives related to the energy efficiency of buildings. The policy should set out the goals of CO2 reduction from a defined starting point and the process under which progress against these goals is measured and enforced.</p>
<p><b>Landowners, site promoters and developers</b></p>	
<p>Barton Willmore for Sulham Estate</p>	<p>We consider that the review of the Local Plan should include the allocation of additional sites for residential development. In particular, Land at Hall Place Farm offers the opportunity to deliver up to 80 homes in the short to medium term in a sustainable location directly adjoining the Eastern Urban Area. The below comprises a summary of that which is contained in the suite of supporting documents which accompany these representations.</p> <p>The following demonstrate that the site is located within a sustainable location:</p> <p>The site is adjacent to the Eastern Urban Area which is categorised as an Urban Area within the settlement hierarchy and should be the focus for the majority of development. This site is within walking distance (800m) of Birch Copse Primary School. The site is also within walking distance (800m) of Little Heath Secondary School. The site is well located in terms of sustainable transport links with the 16, 17 and 33 buses all stopping within close proximity with regular bus services into central Reading. The site is approximately a 15 min walk from Tilehurst Village centre which has a number of local services including a Co-Operative supermarket. The site is located within the North Wessex Downs AONB. Accordingly, these representations are accompanied by a Landscape Capacity Assessment which concludes that the site has an overall low landscape sensitivity and has the potential to accommodate residential development. This is due to the influence of existing suburban fringe characteristics including the built form within the site and adjacent existing settlement edge. In addition, the ancient woodland to the north of the site also serves to shield views of the site from the wider AONB. The proposed layout has been designed with this capacity assessment in mind and looks to constrain development to that area which would not result in undue adverse effect to the AONB. From a heritage perspective, Hall Place Farmhouse which is contained within the site is Grade II listed. In addition, Kiln Cottage which lies to the south of the site is also Grade II listed. In order to consider the impact of these heritage assets on the potential for the development of the site a Heritage Preliminary Risk Appraisal has been prepared. This appraisal considers the site as three separate areas and concludes that whilst the area immediately surrounding Hall Place Farmhouse itself is highly sensitive, subject to sympathetic design, a proposal could be delivered which would not result in significant harm to the heritage asset. To the north of the site is an area of ancient woodland. The proposed layout incorporates a 15m buffer from this area in line with Natural England guidance. The highways technical note which accompanies these representations recommends that the main site access is taken from Little Heath Road. The preliminary site access arrangement complies with design standards in terms of the form of the junction, the carriageway and footway widths and the provision of visibility splays. As such, the report concludes that on this basis, “safe and suitable access to the site can be achieved for all people” in accordance with the requirements of the NPPF (paragraph 32).</p>

Respondent	Response
Barton Willmore for Graham Child	<p>We consider that the overall allocation of sites to meeting the housing need of the District should be carefully considered. We note that the current allocated sites are tasked with delivering the Core Strategy requirement, which is lower than that advised by the SHMA. Moreover, as we have stated we consider that the evidence underpinning the SHMA could be out of date and when tested during the Local Plan Examination, the housing requirement for the district may increase further. It is also noted that the Core Strategy extends only to 2026 and the emerging local plan will deliver housing to 2036. As we have noted above, whilst large strategic sites will be required to contribute heavily to the housing requirement, we advocate a mix of sites in all locations to contribute to the housing requirement of the District and in this regard we submit our clients site for consideration as an allocation within Pangbourne.</p> <p>Our client’s site is situated to the south west of Pangbourne and straddles the development boundary. The site was included within the 2013 SHLAA and has more recently been submitted to the Council’s most recent call for sites, for inclusion within the emerging HELAA. In 2013 the Council provided the following summary of the site within the SHLAA: “The potential impact on the natural beauty of the landscape would be the primary consideration...Landscape assessment required.”</p> <p>In response to the above our client has commissioned a Landscape Appraisal and Opportunities and Constraints Plan, in order to provide more evidence on this issue. The Landscape Appraisal, prepared by Barton Willmore, concludes that:</p> <ul style="list-style-type: none"> <li>• Development of the site would not cause the loss of any valued landscape elements or features;</li> <li>• Development of the site would not cause the loss of any characteristic landscape elements or features;</li> <li>• Development of the site would not interrupt any key views; and</li> <li>• Development of the site would increase the level of vegetation surrounding the site and form a definitive western boundary to the settlement of</li> </ul> <p>In addition to the Landscape Appraisal, our client has also commissioned a Capacity Plan, prepared by Barton Willmore, which takes account of the findings from the Landscape Assessment. The Capacity Plan concludes that the site can accommodate 41 dwellings at a density of 19.9dph.</p> <p>Our client’s site is also within single ownership and is therefore available to come forward immediately.</p> <p>We note that the Housing and Economic Land Availability Assessment (HELAA) is yet to be published and is expected Late 2018, in line with the next round of consultation (Regulation 18). We would advise the Council that our representations, specifically those regarding the landscape assessment of our client’s land, are designed to assist the Council with the conclusions of the HELAA in this regard.</p> <p>Further detail concerning the site is contained in the attached documents.</p>
Bewley Homes	<ol style="list-style-type: none"> <li>1. A Policy that would specifically address the Borough’s growing need for Housing Provision of Older People and specialist housing, such as C2 is necessary to ensure housing need for all is properly addressed.</li> <li>2. The Plan should consider the emerging changes to National Planning Policy Framework relating to 20% of its housing allocations being on sites which are less than 0.5 hectare. This would allow flexibility in the scale of housing sites that are focused in sustainable locations, delivered either as settlement extensions or allocations across the District.</li> <li>3. The emerging Local Plan should consider Woolhampton as a sustainable location for housing and allocate the site</li> </ol>

Respondent	Response
	<p>known as Land North of Bath Road site ref WOOL001 for housing. Previous assessments of the site made by West Berkshire through SHLAA have considered the site to have potential for residential development. The site is located on the west side of Woolhampton within the Parish of Midgham and sits adjacent to the current settlement boundary. The LPA considered its location was well related to the centre of the village and within walking distance of Midgham railway Station.</p> <p>Woolhampton as a service village provides a range of services which include two schools, (one being the local primary school), a church, village hall, village store and post office and a newsagent. The Coach and Horses is a pub and restaurant, whilst The Angel which is open seven days a week provides a restaurant and meeting and Wedding venue. The eastern side of the village also provides a BP petrol filling station, car wash and 24 hr kiosk shop. A garage, car servicing and repair business also operates in the village. Both Thatcham west of the village and Tadley to the south, offer further facilities within a 10 minute drive. It is also well linked to the M4, with travel times to Bristol and London within an hour. In terms of Public Transport links, the Council's Transport Policy Team have previously rated Woolhampton highly in terms of benefitting from good access to passenger transport services, enable existing residents and those from proposed developments to be able to choose modes of travel other than the car. These positive transport benefits include the easy access for Woolhampton residents to Midgham Railway Station via both walking and cycling. Midgham station provides hourly services to destinations including Thatcham, Newbury, Theale, Reading, London Paddington, Basingstoke, and the West Country with more frequent services provided to certain stations during peak times. In addition, Woolhampton is served by bus stops on both sides of the A4 in the village. The bus service is provided by premium Jet Black 1 operating a half hourly service along the A4 Bath Road, stopping in Woolhampton and Thatcham, running between Reading (east) and Newbury (west). Work on a new route of the National Cycle Network has been developed resulting in making improvements to cycle facilities on the A4. The National Cycle Network (NCN 422) once complete will run west to east along the A4/A329 corridor between central Newbury and Legoland, Windsor. The cycle network would deliver positive long-term benefits to residents of Woolhampton and its local economy. The recognised cycle facility along the A4 runs through the village, linking Newbury and Reading, improving linkages to key town centres and employment areas and will encourage the use of local sustainable transport networks. The first phase of the Route 422 Newbury to Ascot stretch of the NCN along Bath Road is already open, and work on the Reading Town centre Phase of the cross Berkshire route began earlier this</p>
Boyer Planning for Spitfire Bespoke Homes Ltd	<p>Our client's interest relates to land located to the south of Back Lane, Beenham, Berkshire. The site comprises 3.19 hectares and is suitable for housing development comprising approximately 40 dwellings in a sustainable central village location.</p> <p>The site contains a single detached bungalow with the rest of the site being agricultural land. The site is located in Flood Zone 1 and there are a small number of trees on the site which could be retained as part of any development proposal. The bungalow lies within the defined settlement boundary, although the remainder of the site lies outside the settlement boundary. The proximity to the settlement boundary however provides a suitable location for the sustainable growth of the village.</p>

Respondent	Response
	<p>Beenham is a linear village, located around 6 miles to the east of Newbury. Beenham has a fairly limited range of facilities although there is a bus service which runs through the village, and a more frequent service running along the A4 towards Reading and Newbury. The nearest railway station is Aldermaston, located approximately 2 miles to the south east. Beenham Primary School is situated on Back Lane, around 0.1 miles to the east of the existing site entrance. Discussions with the Primary School has identified that the village is unable to provide sufficient children to ensure the future sustainability of the school which may be at risk of closure without housing growth in the village. The village contains a public house (The Six Bells) although there is no village shop.</p> <p>To the south of the site is an area of Ancient Woodland and the Old Copse Site of Special Scientific Interest (SSSI). The site is also located within the North Wessex Area of Outstanding Natural Beauty (AONB). Any residential development on the site can be delivered without any detrimental impact on these areas.</p> <p>The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period.</p> <p>As set out above, potential exists for residential development on land south of Back Lane to meet a local housing need in Beenham. Potential may also exist to incorporate an element of social infrastructure where it meets a local identified need. Such development would be sustainably and centrally located in the village and could assist in providing family homes to support the future sustainability of the Primary School and other social infrastructure. Without growth in Beenham, there is a risk that the Primary School may close.</p> <p>A Landscape Appraisal was undertaken by Pegasus Group in relation to the site which concluded that “the site is suitable to accommodate residential development. Mindful that it is located with the AONB environment and it will be necessary to demonstrate how the proposal not only conserves but enhances the environment. It can be demonstrated through a high quality residential scheme in combination with a comprehensive green infrastructure that significant opportunities exist to enhance the local environment not only in terms of scenic beauty and visual amenity but also in ecological and recreational terms” (Para 1.22).</p> <p>Vehicular access to the site is provided from Back Lane which can be delivered with appropriate visibility splays. Back Lane connects centrally to the village.</p> <p>The site is located entirely within Flood Zone 1 and there will be no adverse impact on floodplain flows or conveyance as a result of the development.</p> <p>The site lies close to a SSSI although the site itself is not considered to be of high biodiversity value. Subject to appropriate mitigation measures, the proposed development of the site can be achieved.</p> <p>The potential development of Land South of Beenham for residential development, potentially including social infrastructure improvements to meet local housing needs, offers substantial benefits for the village by providing family housing (including affordable housing) to meet local needs which will support the sustainable future of the village. The detailed analysis and commentary above demonstrates the suitability of the site for allocation within the new Local Plan. Further, the land is under the control of a quality house builder, who is in a position to bring forward the site for approximately 40 dwellings, including affordable housing and potentially some social infrastructure improvements. In addition, the site is deliverable in the immediate five year period and can provide a material number of homes in a</p>

Respondent	Response
	location where the short term need is pressing. For the reasons set out above the site should be allocated within the emerging Local Plan as a housing site allocation for approximately 40 dwellings and associated open space.
Carter Jonas for Hermitage Farms	<p>Given the overall level of housing and employment need, smaller sustainable settlements such as Hermitage can and should accommodate further housing and employment development to help sustain local services and facilities, to support the rural economy, and to improve issues of affordability and the plan should seek to allocate sites in the smaller sustainable settlements such as in Hermitage.</p> <p>Land around Hermitage as identified in the attached document is available now and is deliverable. There are no known constraints which would prevent development in this location. The sites are well related to the existing settlement of Hermitage, and would constitute sustainable development in accordance with the NPPF's presumption in favour of sustainable development.</p>
Deloitte LLP for Green Park Business Park	<p>We write on behalf of our client Green Park Reading No.1 LLP, who is the owner of Green Park business park. Green Park Reading No.1 LLP (GPR) is ultimately wholly owned by Mapletree Investments Pte Ltd (Mapletree).</p> <p>Since acquiring GPR in 2016, Mapletree has been reviewing the Park's potential, undertaking some asset management and considering future opportunities. Green Park is part located in the West Berkshire administrative area. GPR is keen to support the Council in making West Berkshire a sustainable place to live now and the future.</p> <p>Having reviewed the Scoping Report, GPR is supportive of the Councils broad objectives and wishes to comment on some of these to reflect its aspirations for Green Park.</p> <p>Green Park is a premier Business Park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of three local authority areas, covering a 79 hectare land mass offering high quality office stock and associated amenities, located around a central body of water. The Business Park is accessed from the A33 relief road, and is located south of Reading town centre.</p> <p>At present the Park provides around 1.4 million square feet of office space to over 60 companies (excluding those companies located in Regus, i2 Office and Grow@ Green Park), including leading IT, technology and pharmaceutical business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.</p> <p>Green Park is well served by public transport with frequent bus service access to Reading Town Centre and the Madejski Stadium and will accommodate Green Park railway station, anticipated to open in the next 3 – 5 years. Green Park Village, positioned north and west of the business park, provides for a wider residential setting with associated mixed use development.</p> <p>Evolution of Green Park (1985 to Present Day)</p> <p>Green Park was originally identified in the Berkshire Structure Plan in 1985 as a location for 40ha of general employment development including light and general industry and warehousing. Outline permission restricted office use quantum to a maximum of 50% with a required a minimum quantum of light industry (B1c) and general industry and warehousing (B2&amp;8). Between the period 1995 to 2000, the original Outline Permission was later varied to allow for unrestricted B1 office use.</p>

Respondent	Response
	<p>Development of the site since 1985 has largely followed the principles set by the outline application as well as principles set by The Prudential Assurance Company Limited, who appointed Fosters &amp; Partners to create a non-statutory Masterplan in 1998.</p> <p>In 2013, Aukett Swanke were asked by Oxford Properties to undertake a Masterplan refresh, principally in relation to the undeveloped land parcels. The Masterplan refresh was worked in close collaboration with West Berkshire and the adjoining Reading and Wokingham Councils. This has also been cognisant of the wider development aspirations, including Green Park Village and other proposals in the area.</p>
Hallam Land Management	<p>In summary therefore;</p> <ul style="list-style-type: none"> <li>• we are advocating a new approach to planning within this part of Berkshire which is focused on delivering housing across the Housing Market Area regardless of authority boundaries, based upon the principles of sound, strategic, sustainable planning.</li> <li>• we support the further consideration of the Grazeley Garden Settlement and maintain that this proposal provides a genuine and credible response to the future housing and employment needs of West Berkshire.</li> </ul>
Gladman Developments Ltd	<p>It is vital that the policies of the Plan are sufficiently flexible to respond to rapid change. It is therefore important that an effective approach to monitoring is put in place. Suitable provisions should also be included within relevant policies to ensure that a positive response will be taken through decision making when required to ensure that a robust supply of land can be maintained throughout the plan period.</p> <p>These representations provide a range of general observations, together with specific responses to the questions that have been posed within the Local Plan Review Scoping Report. The general observations cover issues relating to: National Policy, Housing White Paper and Emerging Revisions to National Policy, Legal Compliance, Duty to Cooperate, Sustainability Appraisal, Housing and Economic Development Needs and are set out in the attached document.</p> <p>Gladman welcomes the publication of the West Berkshire Local Plan Review to 2036 Scoping Report and consider that this represents an opportunity to comprehensively update the Local Plan. The Review will need to be established against a robust assessment of housing and economic development needs and then identify the additional land that is required to meet those needs in full over the extended plan period to 2036. In this regard, Gladman endorse the following sites for inclusion within the Local Plan:</p> <ul style="list-style-type: none"> <li>• Land off Andover Road, Newbury</li> </ul> <p>It is essential that sufficient flexibility is provided within the Local Plan to enable a rolling 5 year housing land supply to be maintained in a manner that is responsive to rapid change. In addition, the Local Plan must include an approach that positively supports economic development and include policies that are fully responsive to associated needs that may arise that have not necessarily been anticipated by the Plan.</p> <p>Gladman looks forward to being provided the opportunity to comment further on the West Berkshire Local Plan Review to</p>



Respondent	Response
	2036 in due course. Effective and on-going engagement with all interested parties, including the development industry, will ultimately ensure the production of a Plan that is deliverable and successful in achieving its vision and aims.
Nexus Planning for Croudace Homes	<p>As set out above, Croudace Homes considers that a full and comprehensive review of the Local Plan is required in order to ensure that full objectively assessed development needs are planned for within the District as required by the Framework at Paragraph 47. In that regard, we welcome the proposed scope of the review as set out, but consider that regard should be had to emerging changes to the Framework. In seeking to allocate housing we consider that the existing spatial strategy, which places Thatcham in the top tier of the Settlement Hierarchy, remains robust. However, Thatcham was deemed to require a period of consultation under the adopted Core Strategy and was duly allocated for modest levels of growth. That decision was taken nearly 10 years ago and since that time, Newbury and the Eastern Urban Area have seen much greater levels of growth. In accordance with the comments of the Core Strategy Inspector, Thatcham must be considered again for growth this time around. Croudace Homes does not object to the principle of a new settlement at Grazely, but notes that the land would cross Local Authority boundaries and would require extensive cross boundary working in order to be developed. A scheme of this size could only deliver towards the back end of the plan period at best. As such, sustainable options to deliver housing at the existing strategic settlements must first be explored. Against that background, it has been demonstrated through the decision by the Secretary of State that there are technical matters precluding development of at least 225 dwellings on land at Henwick Park, Thatcham. The land is available now, offers a suitable location for development now, and is achievable with development coming forwards within the first five years of the plan period. Thus the site is therefore deliverable within the meaning set out at Footnote 11 of the Framework.</p> <p>Croudace Homes Ltd is actively promoting land at Henwick Park, Thatcham, also known as 'Land North of Bowling Green Road' for inclusion in the emerging Local Plan as a strategic housing allocation. The Henwick Park site comprises 24.5ha of agricultural land and is situated approximately 1.6km to the north of Thatcham Town Centre.</p> <p>The Council will be aware that in July 2015 Nexus Planning, on behalf of Croudace Homes, submitted an Outline Planning application (ref. 15/01949/OUTMAJ) for up to 265 homes on the Henwick Park site (later amended to 225 homes). West Berkshire Council, contending that it has an up-to-date Core Strategy and that it is able to demonstrate a five year supply of deliverable housing sites, refused the application.</p> <p>The application was duly heard by public inquiry (conjoined with the scheme east of Thatcham at 'Siege Cross'). Following the Inquiry which concluded in December 2016, inspector John Chase recommended that both appeals be allowed. However, the applications were called in for decision by the Secretary of State (Sajid Javid) and in a decision letter dated 27th July 2017, the secretary of State disagreed with the inspector's recommendation and refused permission for both schemes.</p> <p>In his decision letters the Secretary of State outlined that following the close of the original inquiry he had received</p>

Respondent	Response
	<p>representations from the Council, including information on an updated five-year housing land supply. The Housing Site Allocations DPD (HSA DPD) had also been formally adopted by the council in May 2017 following the close of the Inquiry.</p> <p>In dismissing the appeals he found that the Council could demonstrate a five-year supply of deliverable housing sites at that time. As such, there were no material considerations sufficient to indicate that the proposals should be determined other than in accordance with the development plan. Significantly however, he found no technical matters that would preclude development at the site including matters such as landscape, transport, ecology or flood risk.</p>
Nexus Planning for Pangbourne Beaver Properties Ltd	
Origin3 Ltd for Sandtrend Ltd	<p><b>Housing Need</b> This section considers the Western Berkshire Housing Market Area (HMA), how forecasted housing needs may need to be met over the plan period and considers the work undertaken by West Berkshire Council in coordination with the other HMA authorities within the Strategic Housing Market Assessment (SHMA) to calculate the objectively assessed housing need (OAHN).</p> <p><b>Duty to Cooperate and Housing Market Areas</b> The legal requirement of the local plan preparation process, the Duty to Cooperate is set out at Section 110 of the Localism Act 2011 and reinforced by national policy at NPPF paragraphs 178 to 181. It requires local planning authorities to cooperate on planning issues that cross administrative boundaries, particularly those strategic priorities set out at NPPF paragraph 156, one of which is the number of homes and jobs needed in an area.</p> <p>NPPF paragraph 159 strongly recommends that where the HMA extends over administrative boundaries, local planning authorities should work with neighbouring authorities to produce a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. The coordination of a SHMA to comprehensively identify the needs of the four authorities within the Western Berkshire HMA is supported.</p> <p>West Berkshire Council should ensure that flexibility is maintained in order to accommodate any unmet housing need arising from within the HMA itself. This is very likely to arise from Reading, in consideration of its tightly drawn administrative boundaries, and close functional relationship with West Berkshire.</p> <p>As set out in Section 2 above, the four local authorities within the HMA have coordinated a non- statutory Spatial Planning Framework (December 2016) which strategically sets out how housing requirements could be met over the period to 2036. This is a good starting point for complying with the Duty to Co-operate, however this must continue through into the respective constituent Local Plans and flexibility must be incorporated in order to meet unmet needs arising due to unforeseen circumstances.</p> <p>At the time of writing, the Spatial Planning Framework envisaged that the four constituent plans would progress near simultaneously which would be advantageous in terms of being responsive to unmet needs arising.</p>

Respondent	Response
	<p>Reading Borough Council are working on producing a new Local Plan for the period up to 2036, having consulted on a Pre-Submission Draft Local Plan in January 2018. We acknowledge that the four authorities have signed a Memorandum of Understanding (MoU) which agrees that Reading cannot accommodate its entire OAHN within its boundaries. We also note that formal requests have been made to Wokingham Borough and West Berkshire to accommodate unmet need. The scale of the shortfall is yet to be agreed but is likely to be within the range of 500 – 1,000 dwellings over the period 2013-2036 and will arise in the second half of the plan period.</p> <p>It is understood that Reading believes that Wokingham Borough and West Berkshire are the most appropriate locations to meet any unmet housing needs arising from Reading, not South Oxfordshire District to the north because of underlying congestion issues<sup>3</sup>.</p> <p>Wokingham Borough Council has consulted on its Issues and Options document in August 2016 with Preferred Options Consultation likely to take place during the course of 2018. Bracknell Forest Borough Council has recently concluded the consultation of its Draft Local Plan in March 2018. It is understood that both Councils have coordinated a formal review of their land that lies within the Metropolitan Green Belt.</p> <p>It is considered that all of Reading Borough, Wokingham Borough and Bracknell Forest Borough are further advanced in their local plan preparation than West Berkshire. This will enable the West Berkshire Local Plan Review to be responsive to meeting any unmet needs arising through the various processes.</p> <p>We support the Council's commitment to meet the full OAHN for the Western Berkshire HMA within the HMA itself. It is however important that the local authorities within the HMA make allowances and maintain flexibility to accommodate any unmet housing needs arising from neighbouring HMAs. The potential considerations of each with respect Newbury and West Berkshire are listed below:</p> <ul style="list-style-type: none"> <li>• Swindon HMA – this HMA is newly formed following the recent Swindon and Wiltshire Joint Spatial Framework The Swindon / M4 Corridor Functional Economic Market Area (FEMA) has a strong eastward focus into West Berkshire and the Thames Valley. It may be more logical and more sustainable for any unmet need arising from Swindon and the wider HMA to be met within West Berkshire which because of the M4 holds a closer functional relationship with the city than more southerly parts of Wiltshire;</li> <li>• Oxfordshire HMA – this HMA is centred on Oxford and similarly to Reading, because of tightly drawing administrative boundaries, requires unmet needs arising from the city to be met in neighbouring The Green Belt around Oxford is a factor alongside the North Wessex Downs AONB in the southern extremes of the HMA. The A34 provides strong connections and a functional relationship between Oxford and Newbury;</li> <li>• Eastern Berkshire and South Bucks HMA – this HMA is heavily constrained by the Metropolitan Green Belt and is considered likely that needs being met outside of the HMA will need to be fully explored, in order to comply with national policy;</li> <li>• Basingstoke and Deane HMA – this HMA holds a close functional relationship with West Berkshire and particularly The northernmost extents of the HMA lie within the Newbury Travel to Work Area (TTWA) because of the A34 and the A339.</li> </ul>

Respondent	Response
	<p>National policy affords Green Belt land the highest protection and the draft revised NPPF considers that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development, which will take into account whether the strategy, amongst other items, has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.</p> <p><b>Demographic Analysis</b></p> <p>It is acknowledged that the starting point for the calculation of OAHN is the latest official household projections which are the CLG 2014-based Household Projections which are, in turn, underpinned by the 2014 based sub-national population projections (SNPP), and the Government's emerging Standardised OAHN methodology.</p> <p>It is noted that for West Berkshire the CLG household projections show a notably lower increase in number of households over the period 2013-2036 (13.7%) when compared with the wider HMA (average 18.8%). The SNPP show a notably lower increase in population (7.1%) when compared with the wider HMA (average 13.2%). Both projections for West Berkshire and the difference between those of the HMA are not fully explained within the SHMA work.</p> <p>It is also noted that the SHMA opts to work on the basis of the rebased SNPP and 10 year migration (without a UPC adjustment). It is questioned why the SHMA does not adequately factor in an allowance for un-attributable population change (UPC) given the SNPP shows that the population of West Berkshire is expected to grow by circa 7.1% over the plan period, below the average for the HMA (13.2%). It would be very prudent to make an adjustment, specifically for West Berkshire, for population growth closer to the average of the HMA.</p> <p><b>Household Formation Rates</b></p> <p>It is understood that the SHMA then seeks to make an adjustment in consideration of household formation rates for younger age groups, addressing evidence of suppression in the historical trends and in line with national policy supporting an improved ability of younger households to form. These issues are particularly prevalent in West Berkshire and Bracknell Forest where the downward trend of household formation in the 25-34 year old age bracket is projected to continue.</p> <p>The OAHN is derived on the expectation that we will continue to experience a reduction in the ability of 25-34 year olds to form households. It is critical that a meaningful uplift is applied, particularly for West Berkshire and Bracknell Forest. It is understood that an uplift of circa 10-12% is applied to West Berkshire and 11-13% for Bracknell Forest, whilst Reading is afforded an uplift of 6-8% and Wokingham 7-8%.</p> <p>It is questioned whether the uplift afforded to West Berkshire and Bracknell Forest is sufficient enough to halt the current downward trend and meaningfully improve headship rates for younger households within these authority areas.</p> <p><b>Supporting Economic Growth</b></p> <p>The principle of the SHMA considering aspirational growth in employment in order to consider whether higher housing provision over and above the demographic projections is required, is supported. The HMA is part of the Thames Valley Berkshire Local Enterprise Partnership (LEP) and also incorporates the rest of Berkshire. The LEP considers that the sub-regional economy is the most productive in the UK outside of London.</p>

Respondent	Response
	<p>The concept of adopting the more positive of the two econometric forecasts (Cambridge Econometrics) for West Berkshire is generally supported, albeit this does not take the economic-led need scenario above the demographic-led need scenario like it does for the other HMA authorities.</p> <p>The economic attributes and self-sufficiency of West Berkshire are being overlooked by the SHMA. West Berkshire has a diverse business profile, being dominated by small and micro-enterprises but also being home to some of the LEP's major corporates, including at Newbury. LEP evidence points to West Berkshire being the most self-contained of the six authorities within the LEP, even more so than Reading. This is reflected in Newbury being recognised as having its own TTWA which also extends into north-eastern Wiltshire towards Swindon and northern Hampshire, whereas the Reading TTWA encompasses most of Wokingham and Bracknell Forest. Furthermore, the LEP report into the Functional Economic Market Areas (FEMA) of Berkshire recognise that West Berkshire is its own FEMA, focused on the key centre Newbury, which is characterised by having a relatively self-contained TTWA and tends to operate within a westward facing commercial property market (towards Swindon). This all points to the capacity for West Berkshire and especially Newbury to accommodate greater growth, taking advantage of good self-containment, thereby reducing commuting as far as is possible. The ongoing electrification of the railway between Reading and Newbury will only serve to increase economic prosperity in West Berkshire.</p> <p>On the basis of the above, it is considered that a greater adjustment for econometrics should be factored in to take the economic-led projection for West Berkshire above the demographic-led projection, in line with the rest of the HMA.</p> <p><b>Market Signals</b></p> <p>The notion of upwards adjustment on the basis of market signals is supported. In respect of West Berkshire and the wider Western Berkshire HMA, the following conclusions can be drawn in relation to an adjustment to account for market signals as noted by the Planning Practice Guidance (PPG):</p> <ul style="list-style-type: none"> <li>• Land Prices – anecdotal evidence suggests that there is strong competition for land that often landowner expectation on value of return is unreasonably high and can often compromise otherwise viable. Despite being marginally below the regional average, the post-permission residential land value in West Berkshire remains substantially above the national average (circa 60%) and points to a prevalent issue (Table 49, Paragraph 6.6, Page 80, OAN Sensitivity Testing – Western Berkshire Housing Market Area (March 2018))</li> <li>• House Prices – the evidence suggests that house prices are growing across the HMA and notably more than the regional average for the South-East. House prices are currently growing fastest in Reading, West Berkshire and Wokingham and slower in Bracknell Forest, perhaps reflecting the availability of employment opportunities and the subsequent commuting patterns that it is notable that West Berkshire has demonstrated similar house price growth comparative to the rest of the HMA despite being further away from London and the tendency to commute into the capital therefore being less (Table 50, Paragraph 6.8, Page 80, OAN Sensitivity Testing);</li> <li>• Rents – the evidence suggests that rents across the HMA have grown relatively uniformly similar to the regional average but markedly above the national average (Table 52, Paragraph 6.15, Page 82, OAN Sensitivity Testing)</li> <li>• Affordability – the evidence suggests that affordability is generally worsening across the HMA, Bracknell Forest and Wokingham remain the least affordable authority areas and this reflects proximity to London but West</li> </ul>

Respondent	Response
	<p>Berkshire remains less affordable than the regional average for both lower quartile and median work-place and residence based earnings and Reading for lower quartile work-place and residence based</p> <ul style="list-style-type: none"> <li>• Rate of Development – the evidence suggests that throughout recent years, average development rates across the HMA have generally remained lower than the respective identified annualised requirements resulting in a marked under-delivery.</li> <li>• Overcrowding – in our experience, overcrowding is compounded by worsening affordability, access to mortgage finance and an under-supply of housing which all lead to a concealed need, perhaps best demonstrated by young people being forced to live with their parents for</li> </ul> <p>Generally, all of the market signals within West Berkshire and the wider HMA point to a lack of housing supply in relation to the number of people who desire to form a household. The ability of an upward adjustment for market signals to comprehensively address an under-supply of housing is questioned. Further clarity on how the household projections take into account unmet need from previous plan periods would also be helpful.</p> <p>In consideration of the prevailing market signals across the whole of the HMA and the modest variance that is evidenced, it is questioned why the SHMA concludes that an uplift of only 10% is considered appropriate in West Berkshire (the SHMA recommends 10-15%), whereas for Wokingham, an uplift of 20% is recommended. In real terms this equates to an uplift of 39 dwellings per annum for West Berkshire and an uplift of 116 dwellings per annum, nearly three times as many as West Berkshire which is disproportionate in consideration of the similar issues faced by the two authorities.</p> <p>Due consideration should be given to the Government's standardised methodology for adjusting for market signals which is linked to affordability ratios and indicates that an uplift of 36% across the HMA, relative to the demographic baseline of household growth per annum, should be applied. This ranges from 28% for Reading, 32% for Bracknell Forest, 37% for West Berkshire and 45% for Wokingham. It is therefore questioned why the SHMA is seeking to apply a far lower market signals adjustment, especially in respect of West Berkshire.</p> <p><b>Affordable Housing Need</b></p> <p>The evidence suggests that there are inherent affordability issues across the entire HMA. The net affordable housing need for West Berkshire is calculated at 180 dwellings per annum but this relies upon a high proportion of total need (72%) being satisfied through relets of current stock which is an unreliable factor. The SHMA estimates that the net affordable housing need across the HMA is 1,328 dwellings per annum, taking into consideration current need, newly forming households, existing households falling into need and supply for existing stock. In consideration of the suggested OAHN of 2,790 dwellings per annum for the HMA, it is difficult to see how the OAHN is sufficiently high enough to make a positive contribution to improving issues of wide-spread issues of affordability and provide more affordable housing.</p> <p><b>Significant Boost to Supply of Housing across West Berkshire?</b></p> <p>NPPF Paragraphs 47 through 55 set out the aspiration to 'boost significantly' the supply of housing. This suggested significant boost is in order to combat and eventually remedy a historic and chronic under-supply of housing across the United Kingdom. This should not factor in a response to demographic changes which would have had to have been planned for in any event i.e. the significant boost should be considered as a policy and supply factor after forecasted population projections have been established.</p>

Respondent	Response
	<p>The West Berkshire Council Core Strategy (July 2012) set a housing requirement of 10,500 net additional dwellings over the period 2006 to 2026, this equates to a net additional dwelling requirement of 525 dwellings per annum. The West Berkshire Local Plan Annual Monitoring Report (AMR) states that 5,497 dwellings were delivered over the period 2006-2017, equating to an average delivery of 500 dwellings per annum which represents under-delivery of around 5% over the first eleven year period of the plan.</p> <p>The SHMA suggests that the OAHN for West Berkshire over the plan period 2013-2036 should be 600 dwellings per annum. On the assumption that a similar under-delivery is recorded in the next plan period then this would equate to the delivery of around 570 dwellings per annum. Can 570 dwellings per annum be considered to be a significant boost in the supply of housing from the 500 dwellings per annum historically delivered? It is a modest 14% increase. National and local policy objectives, supply capacity and cross-boundary unmet need arising should all be considered following the calculation of the OAHN to determine an appropriate overall housing provision target.</p> <p>To summarise the above, we ask the Council to consider the following headlines:</p> <ul style="list-style-type: none"> <li>• The coordination of a SHMA to comprehensively identify the needs of the four authorities within the Western Berkshire HMA is supported;</li> <li>• West Berkshire will need to account for some of Reading's unmet housing need following the signed Memorandum of Understanding;</li> <li>• We support the Council's intentions to arrive at a suitable OAHN beyond simply applying the Government's emerging standardised methodology however urge the Council to ensure that is robust enough to sufficiently account for under delivery to date, Reading's unmet need and account for local affordable housing</li> </ul> <p>Land West of Wantage Road, Donnington, Newbury</p> <p>Our client's site at 'Land to the west of Wantage Road', Shaw-cum-Donnington is located directly north of Newbury. The site is located within the West of Berkshire Spatial Framework Plan Newbury 'Area of Search'. Development prospects in this location should therefore be tested and explored through the LPR.</p> <p>Details of site included in attached document</p> <p>Conclusion</p> <p>As set out throughout these representations, we support the Council's intentions to undertake a comprehensive Review of the Local Plan providing that through this process the Council arrive at a suitable OAHN (and subsequent housing requirement for the new plan period) and put in place a strategy to deliver new homes in sustainable locations, including non-strategic housing allocations.</p> <p>At a minimum, the LPR will need to satisfy the tests of soundness set out in the NPPF paragraph 182 to ensure the plan is positively prepares, justified, effective and consistent with national policy.</p> <p>In this instance, due to the timing of the LPR, particular regard will need to given to consistency with national policy in the context of emerging national policy. Most notably updates to the NPPF expected to be formally put into place later this year.</p>

Respondent	Response
	<p>As a starting point, the Council should test and explore strategic and non-strategic development opportunities within the Areas of Search identified in the West of Berkshire Spatial Framework Plan which was published by the four authorities within the Western HMA and therefore represents a cohesive, joined approach.</p> <p>As part of this, our client's site at Land West of Wantage Road, Donnington, Newbury, presents a suitable, sustainable location to direct new development. The site has the capacity to deliver up to 200 dwellings in the immediate short term as a standalone application or alternatively could form part of a wider strategic option to the north of Newbury, depending on the Council's aspirations.</p>
Pegasus Planning Group Ltd for Donnington New Homes	<p>As raised in the previous response, the provision of accessible homes for older people should be addressed as part of the review. This may be as part of Policy CS4: Housing Type and Mix, or as part of a new, standalone policy. Tourism should also be addressed as part of the review, and a specific policy should be created for it.</p> <p>The provision of community uses as part of new development should also be examined, and a new policy created to address it.</p>
Pegasus Planning Group Ltd for Donnington New Homes	No – there are not any other policy issues that should be considered as part of the review of the Local Plan.
Pro Vision for Audley Group	<p>Following on from our comments regarding the draft objectives, the revised Local Plan should positively address meeting the objectively assessed need for specialist accommodation, including accommodation and care to meet the needs of an ageing population.</p> <p>It should, however, be mindful that simplistic responses to the challenge of planning for an ageing population are possible with an inadequate policy position. For example, it may be possible to satisfy the planning requirement for 'specialist accommodation' for the elderly by simply providing age-restricted conventional accommodation. The addition of an age-restriction, such as over 55's, should not be considered an appropriate long- term solution to the objective of helping people to live independently for as long as possible. Rather, the revised Local Plan should actively support genuinely specialised accommodation models that provide for the changing needs of the elderly overtime and therefore provide a secure and comfortable environment without the prospect of further essential moves in later years. The revised Local Plan should explicitly recognise and support the full spectrum of specialist elderly care models, including Use Class C2 which helps people to remain living independently.</p> <p>Positively supporting elderly independent living models will also have a benefit for the wider challenge of meeting overall housing requirements by freeing-up under-occupied market housing (see reference to the NPPG below).</p> <p>Positive policy support for C2 provision would also be justified in the context of recent research that identifies that this specialist accommodation helps to reduce the burden on health services. For example, key findings of a recent study (Collaborative Research between Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust, Aston University, The Final Report, April 2015) included:</p>



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	<ol style="list-style-type: none"> <li>1. The ExtraCare Charitable Trust model can result in significant savings for NHS budgets – over a 12 month period costs total NHS costs (including GP visits, practice and district nurse visits and hospital appointments and admissions) reduce by 38% for ExtraCare residents who were in the sample across the period.</li> <li>2. NHS costs for ‘frail’ residents had reduced by 51.5% after 12 months.</li> <li>3. The ExtraCare model is associated with a significant reduction in the duration of unplanned hospital stays, from an average of 8-14 days to 1-2 days.</li> </ol> <p>The adopted Core Strategy is very indistinct and generalist in terms of addressing this key issue of planning for the challenges of the ageing population. Part of the Spatial Vision states:  “The District will be coping well with the challenges of an ageing population, partly by retaining larger numbers of younger people and families (through the provision of an appropriate range of housing in terms of size and tenure), who will help support the older communities but also through increased investment in accommodation for the elderly”.(our emphasis).</p> <p>Policy CS4 (Housing type and mix) states that:  “Residential development will be expected to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community, including those with specialist requirements”. (Our emphasis)</p> <p>The supporting text goes on to explain that:  “Housing provision must support the needs of the whole community, include the provision of both market and affordable housing, and reflect the needs of specific groups such as families with children, single person households, the elderly, and those households with special needs.” (Our emphasis).</p> <p>There are, however, no specific or positively worded site allocation or identification policies about meeting the needs for the elderly, nor addressing the different formats in which this need can and is being met by Audley and others. Given the widely recognized issue that the country, including West Berkshire, has a rapidly growing elderly population, the revised Local Plan should include specific policies to positively meet this need.</p> <p>Addressing the needs of the elderly is recognised in national policy (as we have noted in response to Question 2). Supporting the NPPF, the National Planning Policy Guidance (NPPG) specifically addresses “how local authorities should deal with housing for older people” (para 037):  “Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan”.</p> <p>Regarding development management decisions, it goes on to state that:  “evidence that development proposals for accessible and manageable homes specifically for older people will free up under-occupied local housing for other population groups is likely to demonstrate a market need that supports the approval of such homes”.</p> <p>In terms of assessing the need, the NPPG (para 021) states that:</p>

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	<p>“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013)”.</p> <p>“Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely for as long as possible, or to move to a more sustainable accommodation if they wish”.</p> <p>“Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that area under occupied”.</p> <p>“The future need for specialist accommodation for older people broken down by tenure and type (eg sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2)”.</p> <p>As well as the NPPG, the review of the Local Plan will need to take into account the latest Strategic Housing Market Assessment (SHMA). The latest version of the SHMA addresses the provision ‘Registered Care Housing (C2 class)’ at section 9. The picture across the SHMA area is that there is expected to be a shortfall in accommodation of 3,462 bed spaces looking ahead to 2036, equating to 151 bed spaces per annum.</p> <p>For West Berkshire alone, the shortfall is calculated as 599 bed spaces<sup>11</sup>. In Audley’s experience, and as reflected in the Committee Report publication by HCLG – ‘Housing for Older people’ (Paragraph 120), the vast majority of residents within an Audley care community come from the local area. The provision of additional specialist accommodation for the elderly within West Berkshire would make a direct and tangible contribution to meeting local need and the Local Plan should encourage this.</p> <p>The SHMA (paragraph 9.43) states that these figures are very relevant</p> <p>“if the Councils intend to include residential institutions which do not meet the definition of a dwelling in their assessment of 5-year housing land supply as it will be necessary to include figures on both the need and the supply side of the equation”.</p> <p>As noted above, the NPPG has clarified that LPAs should include Use Class C2 against their housing requirements. The SHMA (paragraph 9.44) also notes that:</p> <p>“Although residential institutions which do not meet the definition of a dwelling cover more than just elderly accommodation, the elderly age groups are the only ones expected to see a notable increase in its population”.</p> <p>In principle, Audley will therefore support an explicit policy (or policies) in the revised Local Plan, which is consistent with the NPPF and NPPG, to support and guide meeting the needs for an ageing population which is above the national average in West Berkshire. Without a positive policy position, this key issue for the district is likely to get worse, which would have a significantly detrimental consequence for meeting overall housing needs and social well-being within the district.</p> <p>An example of an LPA that has already made an attempt to positively meet this need is North Somerset District Council. Its Sites and Policies Plan Part 1 (adopted in July 2016) includes policy DM40 and DM4112,</p>

Respondent	Response
	<p>Policy DM40 states that the LPA will “support retirement accommodation and supported independent living for older and vulnerable people” subject to specified criteria. It also acknowledges that these uses can “blur the edges of C2 and C3 use”. Policy DM41 states that the LPA will support “extensions that would result in extra capacity to new or residential care or nursing homes within Class C2” subject to specified criteria.</p> <p>It is important, however, that Local Plan policies explicitly support care communities which, as noted under our response to Question 2, are now widely recognised as being a more effective response to the elderly care challenge than traditional nursing and care homes.</p>
Pro Vision for Rivar Ltd	<p>Our response to Question 1,above, is relevant to Consultation Question 7 of the SA (SEA) Scoping Report, as set out below:</p> <p>The SA Objectives reflect the economic, social and environmental dimensions to sustainable development defined in paragraph 7 of the NPPF and carried forward in the proposed revisions to the NPPF. However, Table 4 of the SA (SEA) Scoping Report does not provide an accurate assessment of the compatibility of the SA Objectives and the Local Plan Review Objectives.</p> <p>In its current form, Local Plan Review Objective A Climate Change should be shown as working against SA Objectives 1and 10. Minimising demand for energy is likely to restrict housing development and economic growth.</p> <p>Local Plan Review Objective B Housing does not strongly support SA Objective 1. The Local Plan Review Objective should be focussed on meeting the identified local need for housing to ensure compatibility with the SA Objective.</p> <p>Local Plan Review Objective D Economy does not strongly support SA Objective 10, as the SA Objective requires identified needs to be met, whilst the Local Plan Review Objective makes no reference to the assessment of need.</p> <p>Local Plan Review Objective E Town Centres does not strongly support SA Objective 10, as if a diverse mix of uses (including housing, offices and live / work) are not promoted in town centres, vacancy rates are likely to increase.</p>
Joy Schlaudraff	<p>Yes. There should be a specific policy that identifies semi-rural sites, or potential semi-rural sites. These are often the most pleasant and positive places to live, due to their proximity to towns, large villages, and urban areas, but very hard to get allocated for development.</p> <p>These would be developed by the private small developer, which give the best quality developments with attention to detail.</p> <p>Yet they are also most conservant of green space, as they secure the future of an area, but use land effectively.</p> <p>Paragraph 55 of the nppf should be taken as it is meant to be interpreted for mixed use schemes or small major housing developments, not just single dwellings.</p> <p>Where there is development with ANY kind of standard community benefit (community hall, school, meeting places, or anything of public benefit – these applications should be allowed). It should not have to be a specific scheme, this or that, just proven public benefit should be enough, along with the quality of a development, and its respect to councils standards of quality relevant to the particular location.</p> <p>Paragraph 95 of the draft nppf should also be given great weight.</p>

Respondent	Response
	As long as buildings fit in with the character and appearance of a place, and are suitable in their use and design, that should be sufficient.
Turley for Berfeld Limited	<p>We consider that the following evidence and policy documents should be considered as part of the Local Plan review to inform and directly influence future policies.</p> <p>West Berkshire Strategic Flood Risk Assessment: Climate change is increasing flood risk to the planning authorities and exposing their housing stock to increased levels of flood risk e.g. 30,000 homes are already at risk in West Berkshire and over 6,000 in Reading and more in Wokingham. New developments that seek to reduce flood risk to existing communities at risk of flooding should be encouraged.</p> <p>It is also important to recognise that flood risk management occurs across catchment wide spatial areas and there may be a need for cross-boundary collaboration between local authorities to bring forward development that manages and reduces flood risk.</p> <p>West Berkshire Local Flood Risk Management Strategy (LFRMS): Increase the ability for West Berkshire Council to rapidly deploy a scheme to alleviate flooding and prioritise sites that bring forward flood risk management.</p> <p>West Berkshire District Council Level 1 SFRA: It strives to ensure a positive reduction in flood risk through future development and regeneration as well as reduce the risk of flooding to existing development.</p>
Turley for Commercial Estates Group	<p>As explained, we consider that there is a requirement for a number of sites to be progressed through being allocated within the Local Plan Review, which will provide extensive new infrastructure and ensure that housing need within the District can be effectively addressed. Newbury, being the largest and most well-served settlement in West Berkshire, is considered to represent one of the most sustainable locations for development. The Local Plan Review should therefore consider the potential for new development at the town.</p> <p>We consider that our land interests at North Newbury can make a significant contribution to the supply of new dwellings in West Berkshire. The proposal is to provide an extension to the site 'Land adjacent to Hilltop, Oxford Road, Donnington, Newbury' which benefits from outline planning permission (Pins Ref: APP/W0340/W/16/3143214) for; "401 dwellings on 11.35 hectares of land. A 400 sq.m. local centre (Use Classes A1/A2/D1/D2 – no more than 200 sq.m. of A1) on 0.29 hectares of land, a one form entry primary school site on 1.7 hectares of land, public open space, landscaping and associated highway works."</p> <p>It is considered that an extension to this site would allow for the provision of new dwellings, as well as areas of green infrastructure, public open space and community facilities and could help to assist with the movement of traffic in and around this part of Newbury.</p>
Turley for North East Thatcham Consortium	<p>The Consortium does not have any further comments at this stage, but reserves the opportunity to address the contents of the Local Plan Review and the associated evidence base as it emerges.</p> <p>In making these representations, the Consortium is mindful that the revised draft National Planning Policy Framework has been issued for consultation. Accordingly, the Consortium reserves the opportunity to provide any subsequent comments in accordance with the updated national planning policy context as it emerges.</p>

Respondent	Response
	<p>Collectively the Consortium controls a significant area of land to the north east of Thatcham. This area can make an important and significant contribution towards meeting the housing needs of West Berkshire and the HMA and towards providing infrastructure improvements (notably education facilities) at Thatcham.</p> <p>The Consortium would welcome the opportunity for constructive engagement with the Council's Planning department in order to discuss the contribution that the land north east of Thatcham may be able to make towards achieving the objectives of the Local Plan Review over the period to 2036.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The West Berkshire District Local Plan 2001 – 2006 contained a policy ENV.20 on the redevelopment of existing buildings in the countryside. However, this policy was superseded by policy C1 on the Location of New Housing in the Countryside in the Housing Site Allocations DPD. This was not replacing like with like as the supporting text to policy ENV20 explained that its purpose was 'to assist the diversification of the rural economy and to maintain or enhance the rural economy.' It did not relate therefore primarily to the provision of new housing.</p> <p>It is important that the new Local Plan contains a policy on the redevelopment of existing buildings in order to be consistent with the advice in the NPPF which states in paragraph 28 that Local Plans 'should support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings.' This is further emphasised in the proposed revisions to the NPPF, which adds additional text in paragraph 85 stating that: 'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport.'</p> <p>To include provision for the redevelopment of existing buildings in the countryside is also important in promoting a prosperous rural economy as the existing buildings may not be suitable for conversion to business use, necessitating the replacement of the existing buildings in order to satisfy the needs of rural enterprises.</p>
Woolf Bond Planning for JJP Land Ltd	<p>Our client's interests relate to land located at Brook House Farm, Sulhampstead Road, Burghfield. The site has a significant planning history, including a previous application for the erection of 40 dwellings (24 market houses, 10 affordable houses and 6 affordable flats) (LPA Ref. 16/03638/OUTMAJ). Some of the information associated with the previous application, together with additional supporting information, is included in support of these representations.</p> <p>The site extends to a total 2.9ha and is suitable for housing development comprising approximately 40 no. dwellings in a sustainable location as an extension to the settlement of Burghfield Common.</p> <p>The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period.</p> <p>As noted above, we propose an amendment to the settlement boundary of Burghfield Common to include our client's site at Brook House Farm together with the adjoining established residential area off Rowan Way and Saxon Gate. This forms an accessible and sustainable location for a medium sized residential development opportunity which as outlined above, is consistent with the current strategy. The site is defined and contained by further permitted development on its western side at Brookhouse Farmhouse (12/00484, 13/01541 an 14/00604).</p>

Respondent	Response
	<p><b>Conclusion</b></p> <p>For the reasons set out above, the Local Plan could risk failing the NPPF tests of soundness for the following reasons:</p> <ul style="list-style-type: none"> <li>• <b>Negatively Prepared</b> – If it does not plan for appropriate housing delivery having regard to minimum needs within West Berkshire District or the wider needs occurring elsewhere in the HMA. Further if it fails to allocate a sufficient amount of housing land to meet pressing needs early on in the plan period.</li> <li>• <b>Unjustified</b> – If the proposed housing distribution strategy fails to acknowledge the continued suitability of Burghfield Common as an appropriate location for housing growth and identifies inappropriate potential housing sites when considered against the reasonable alternative of a housing allocation at Brook House Farm</li> <li>• <b>Ineffective</b> – If the plan fails to propose an appropriate housing distribution strategy or introduce sufficient flexibility into the developable supply over the plan period.</li> <li>• <b>Inconsistent with the National Policy</b> – If the plan fails to allocate an appropriate amount of housing land or in the right location, having particular regard to the need for housing in rural locations.</li> </ul>
Woolf Bond Planning for Donnington New Homes	<p>We propose an amendment to the settlement boundary to include our client's site at Curridge, to the north of Kiln Drive. This forms an accessible and sustainable location for a small to medium sized residential development opportunity. Our client's site is located on the northern side of the village of Curridge. As discussed above it is located within close proximity to the main Urban Area of Newbury and the Service Village of Hermitage. The site comprises undeveloped land bound by residential development on its southern and eastern sides, covering 4.16 ha. The site could be accessed direct from Kiln Drive and suitable visibility splays provided accordingly.</p> <p>The site's southern and eastern boundaries lie adjacent to a ribbon form of development that runs along Kiln Drive and forms the village's settlement boundary.</p> <p><b>Development Considerations</b></p> <p>As discussed in our response to earlier questions, there is a clear imperative in the draft NPPF to provide housing development in rural locations where a site offers the ability to deliver a sustainable form of development. With the above principle in mind, any future scheme's key elements could comprise:</p> <ul style="list-style-type: none"> <li>• Erection of up to 125 no. houses (in a mix of sizes and forms), associated gardens and landscaping;</li> <li>• Provision of local open space and area of allotments for community use acting as a focal point to the settlement of Curridge;</li> <li>• Provision of an appropriate access (to adoptable standard) from Kiln Drive;</li> <li>• Buildings heights to not exceed two storeys, in order to provide for an appropriate transition between built form and the wider countryside beyond; &amp;</li> <li>• Extensive structural planting, including a comprehensive landscape buffer on the site's northern</li> </ul> <p>Furthermore, Curridge Primary School may benefit from an appropriate increase in pupil intake from the immediate area. Our client's land at Curridge is a deliverable site that will deliver significant benefits for both existing and future residents in the area. Accordingly the Council should allocate it for a residential led development. We note that the site's size</p>

Respondent	Response
	<p>comprises 4.16ha and enables a low to medium density scheme to be brought forward that provides for approximately up to 125 no.dwellings.</p> <p><b>Masterplanning &amp; Landscape Considerations</b>  The site is not subject to any statutory or non-statutory designations for landscape quality, scientific or nature conservation interest and there are no known heritage assets which will be affected by the proposals. The scheme can be supported by a comprehensive landscape strategy to provide a significant amount of green infrastructure which will help assimilate the development into the wider landscape character comprising dwellings interspersed with trees/landscaping. Our client will shortly be commissioning a masterplan exercise, to consider an appropriate residential layout, incorporating a comprehensive landscape strategy and potential community uses. We would be more than happy to share the outcomes from this exercise with the Council should the Council wish to discuss this site opportunity further.</p> <p><b>Highway Considerations</b>  Vehicular access to the site is proposed from Kiln Drive with appropriate visibility splays provided. Further a safe pedestrian link through the site linking the eastern and western parts of Curridge could be provided generating a highway safety benefit.</p> <p><b>Drainage Considerations</b>  The site is located entirely within flood zone 1 and there will be no adverse impact on floodplain flows or conveyance as a result of the development. The scheme would be supported by a sustainable drainage strategy that accords with requirements to restrict surface water runoff rates to existing greenfield rates</p> <p><b>Ecological Considerations</b>  A suite of ecology surveys would be undertaken. At a desktop level there is nothing to suggest that the site is of high biodiversity value. Subject to appropriate mitigation measures, the proposed scheme is appropriate in ecological respects.</p> <p><b>Summary</b>  The site is under the control of a local housing developer, who is in a position to bring forward the site for an approximate up to 125 no. dwellings, parking, upgraded access, open space and landscaping.  In addition, the site is deliverable in the immediate five year period and can provide a material number of housing units in a location where the short term need is pressing.</p> <p>For the reasons set out above the site should be allocated within the emerging plan as a housing site allocation for approximately up to 125 no. dwellings and associated open space. The settlement boundary should therefore be revised as illustrated on the plan attached in future iterations of the Local Plan.</p> <p><b>Conclusion</b>  For the reasons set out above, it is paramount that the Local Plan addresses the below:</p> <ul style="list-style-type: none"> <li>• Positively Prepared – It will need to plan for appropriate housing delivery having regard to minimum needs within West Berkshire District and the wider needs occurring elsewhere in the HMA. Further it will need to allocate a sufficient amount of housing land to meet pressing needs early on in the plan</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Justified – The proposed housing distribution strategy should acknowledge the settlement of Curridge as an appropriate location for housing growth and in turn propose a housing allocation on land to the north of Kiln Drive,</li> <li>• Effective – The plan should propose an appropriate housing distribution strategy and introduce sufficient flexibility into the developable supply over the plan period (including allocation of small and medium sized sites).</li> </ul> <p>Consistent with the National Policy – The plan should allocate an appropriate amount of housing land and in the right location, having particular regard to the need for housing in rural locations on underutilised, smaller sites</p>
Woolf Bond Planning for Donnington New Homes	<p>Our client's interests relate to land located at Ashmore Green Farm, Stoney Lane, Ashmore Green. The site has a significant planning history, including a previous application for its redevelopment to provide 11 no. residential dwellings (LPA Ref. 12/01063/FULMAJ). Some of the information associated with the previous application and additional further information is included in support of these representations.</p> <p>We propose an amendment to the settlement boundary to include our client's site at Ashmore Green Farm, to the north of Stoney Lane. This forms an accessible and sustainable location for a small to medium sized residential development opportunity. The site is deliverable in the immediate five year period and can provide a material number of housing units in a location where the short term need is pressing.</p>
WYG for Donnington New Homes	<p>Donnington New Homes is supportive of the general approach set out in the Local Plan and Sustainability Appraisal Scoping Reports. However, for the reasons set out above, it is requested that a new policy is included in the West Berkshire Local Plan 2036, to include the allocation of land to the south of Sandford Park to deliver up to 500 dwellings and the link road to the A343 at Wash Water.</p> <p>These representations follow previous submissions in 2013 (for inclusion in the Strategic Housing Land Availability Assessment (SHLAA)) and in 2017 in response to the Council's Call for Sites (HELAA). A copy of the March 2017 submission can be found in the attached document.</p>

## Summary of responses

There was a wide range of responses to this question, and a common theme of responses related to the need for policies on health and wellbeing and sport and recreation, for elderly people's accommodation/extra care accommodation, and for community and cultural facilities. In terms of community and cultural facilities this focused on not only the protection but also the provision of such facilities, including churches, community halls, cinemas, theatres, pubs and music halls. One respondent suggested that development with any kind of community benefit should be allowed.

In terms of housing growth Thatcham should now be considered as a suitable location for allocations. There is a suggestion of allocating omission sites or 'back up' sites in the event where sites are not delivering the houses as envisaged, or there are other factors which influence the progress (e.g. economics). One respondent considered that the allocation of sites should concentrate on infilling and brownfield sites before greenfield sites. A respondent commented that there should be consideration of the 20% of housing allocations on sites less than 0.5 hectares, as per the revised NPPF. Similar to the respondents to question 6 there was



consideration of the extension of sustainable settlements and the allocation of 'semi-rural' sites, and for the inclusion of a policy akin to former Local Plan Policy ENV20 for rural businesses.

Infrastructure was highlighted by respondents, with a statutory consultee encouraging a policy on water supply and wastewater. Footpaths, street lighting, health provision and educational establishments were also highlighted. Conversely, one respondent commented that if the housing and industry is planned correctly then leisure, health and cultural facilities will naturally develop.

When considering landscape, biodiversity and heritage there was comment that there should be a strengthening of policy on light pollution and the governance of external lighting, particularly in the AONB; that there should be a protection of irreplaceable habitats such as ancient woodland, and of watercourses; there should be a definitive definition of 'Green Infrastructure', which should encompass 'Blue Infrastructure'; and that there should be consideration of further detail of heritage assets.

When considering human health an internal consultee noted that a priority of the Council is for the protection and improvement of local air quality. Therefore, updating the policy for pollution and noise in line with new guidance is needed.

There were queries about the duty to cooperate and taking on unmet need from surrounding authorities; housing affordability; and whether West Berkshire Council aims to boost the supply of housing when looking at the SHMA and Government target figures.

## **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). The Council will need to prepare the Review to conform to the revised national policy in the NPPF published on 24th July 2018.

The four Western Berkshire authorities are committed to meeting the housing requirement across the Western Housing Market Area. To this end the Councils have agreed a Memorandum of Understanding which states that the four authorities will continue to work together to ensure that local plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need in Reading.

Housing need will be assessed using the government's standard method contained in the revised NPPF and PPG. This assessment will use the most up to date household projections as a starting point and the resultant need figure is considered to represent the minimum requirement to be included within the Local Plan Review to 2036. This figure will supersede the OAN in the 2016 Berkshire SHMA. The LPR will set out the strategy to meet this revised requirement. It will consider both strategic and non-strategic growth opportunities to meet the need over the plan period, including housing in rural areas of the District. The HELAA will provide evidence of growth opportunities in the area and will identify sites that have potential for development to inform the spatial strategy. Most of the sites that will be included were submitted through the Call for Sites (December 2016 to March 2017), through which agents and the public were invited to submit sites that they considered developable.

Where respondents have highlighted specific concerns and have made suggestions for the strengthening of particular topics they will be taken forward in more detail through the development of both strategic and local policies as appropriate.

## **Summary of responses received to the SA/SEA Scoping Report (February 2018)**

Number of responses received: 207

### **Summary of responses:**

There was an overall consensus that the baseline information was adequate with some exceptions relating to the age of some data and the paucity of data on green infrastructure, tourism and recreation, and the racehorse/equestrian industry. There were many useful suggestions to tighten up the evidence.

Overall there was general agreement with the key sustainability issues and objectives identified. A number of refinements were suggested from statutory bodies and 'tourism' proposed as an addition. Ranking the objectives was not seen as helpful.

There was some overlap with the issues raised under the Local Plan Review scoping report, including:

- the timescale of the Review;
- the justification for any large scale development to the south of Reading;
- an endorsement of cross boundary working;
- favouring large site allocations in and around urban areas as the most "sustainable locations" and in contrast;
- the benefits of allocating smaller sites adjacent to smaller sized settlements as a potential strategy for aiding housing delivery and supporting sustainable development in rural areas;
- the need for a settlement boundary review;
- a greater commitment to fulfil the unmet housing need from neighbouring authorities, especially Reading;
- the need for an overall vision to provide context and sense of direction;
- the weight to be given to the draft and final versions of the revised NPPF;
- the need to present housing numbers by spatial area;
- the provision of housing for younger people and affordable housing;
- the provision of necessary infrastructure with the developments, including implications of electric/zero carbon technological developments.

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q1: Are there other relevant policies, plans, programmes, and sustainable development objectives that will affect or influence the West Berkshire Local Plan Review?

Number of responses received: 21

Respondent	Summary of Response
Julian Worth	<p>Stronger links need to be made with the Minerals &amp; Waste Local Plan as this covers important and potentially disruptive issues such as extraction, which impact significantly on the subjects considered in the Local Plan, notably landscape and water. In general, extraction in new areas should be opposed - alternative sources of aggregates are available, notably through the Theale rail depots, and despoilation of West Berks can be avoided by making greater use of these alternatives</p>
Stratfield Mortimer Parish Council	<p>The initial section of the consultation document identifies key issues relevant to West Berks and goes on to give the Sustainability Appraisals (SA) objectives. However the key issues seem to be a mix of trends, such as an ageing population, and desirable outcomes, such as maintaining vitality of town and village centres. Should they not be one or the other? Should they not all be existing or expected problems or opportunities? Even a wording change would at least give consistency. For instance.....The continuing threat posed to town and village centres by changes in social attitudes.... as opposed to the existing ... Maintaining vitality of town and villages centres.....</p> <p>Irrespective of the above, it is considered that the changes likely to be brought about by automation and AI, for example, are a key issue both in the physical changes they will bring as well as the social change that is expected as a result. One of those social changes could be the erosion of community spirit in the towns and villages of West Berks if identified trends in behaviour continue. This is also considered a key issue.</p> <p>The examples above illustrate a wider point that the whole analysis seems to rest on an examination of existing policies and information describing the present situation. It is felt very strongly that likely future trends and developments should be considered just as, if not more than, important than the existing situation.</p> <p>As far as the objectives are concerned it could be argued that some of them are contradictory but this may well be intentional and acceptable. For example, to promote the opportunity for travel may contradict the aim of conserving and enhancing the natural environment.</p> <p>Of more significance is the objective of promoting and maximising opportunities for all forms of safer and sustainable travel. Surely in sustainability terms should not the first action be to minimise the need to travel? Only when a trip is necessary should it be safe and sustainable.</p> <p>Similarly should not the objective about emissions start off with eliminating the need for unnecessary emissions before going any further?</p>
Carter Planning for Mr RLA Jones	None

Respondent	Summary of Response
Burghfield Parish Council	Not that we are aware of.
Burghfield NDP Steering Group	Not that we are aware of.
North Wessex Downs AONB	Failed to acknowledge AONB management Plan which WB have signed up to and forms part of their development plan. Need to now include the Governments 25 year Environment Plan and proposed amendments to the NPPF.
Turley Associates for North East Thatcham Consortium	<p>These representations are provided jointly and severally on behalf of the North East Thatcham Consortium (“the Consortium”) in response to the Local Plan Review to 2036 Sustainability Appraisal Scoping Report. Alongside these representations, comments have also been submitted in response to the associated Local Plan Review to 2036 Scoping Report.</p> <p>The North East Thatcham Consortium comprises A2Dominion; Donnington New Homes, Ptarmigan and Gully Farm and these representations are made jointly and severally on behalf of the Consortium members.</p> <p>The Consortium have reviewed Appendix 1 of the SA Scoping report and would recommend that the following policies, plans and programmes be reviewed and their respective requirements/ recommendations be incorporated for incorporation within the SA:</p> <ul style="list-style-type: none"> <li>• The draft revisions to the National Planning Policy Framework (NPPF). <a href="https://www.gov.uk/government/collections/national-planning-policy-framework-and-developer-contribution-consultations">https://www.gov.uk/government/collections/national-planning-policy-framework-and-developer-contribution-consultations</a></li> </ul> <p>At the end of Appendix A and on Page 12 of the SA Scoping Report are a summary of the key sustainability objectives/ issues emerging from the review of relevant policies, plans and programmes. The Consortium considers that the following objectives should be presented or amended to inform the SA process and Local Plan Review:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance wildlife habitats and species <i>or where possible secure net overall gain where development is needed to satisfy other objectives.</i></li> <li>• To improve educational standards and access to educational facilities <i>in line with the growth in local communities.</i></li> <li>• The need to provide for new community infrastructure such as primary and secondary schools to meet current and projected demand.</li> <li>• Maintaining the vitality of town and village centres <i>through the allocation of new housing and employment land in the most sustainable locations.</i></li> <li>• <i>The need to tackle areas of deprivation in Thatcham and Newbury in the context of a relatively affluent local authority area.</i></li> </ul>
Woolf Bond Planning for Donnington New Homes	We agree that the suggested list of relevant policies, plans, programmes, and sustainable development objectives are appropriate.
Historic England	<p>In Appendix 1: List and Review of Relevant Plans, Programmes and Strategies reference should be made to the 2016 Culture White Paper. “Conserving and enhancing the historic environment” is a key objective of the NPPF.</p> <p>We welcome the identification of the Historic Environment Character Zoning and Historic Environment Action Plan in Appendix 1. Other relevant background documents for the historic environment should ideally be specified in the text e.g. the West Berkshire</p>

Respondent	Summary of Response
	Historic Environment Record, the West Berkshire Historic Landscape Characterisation, Conservation Area Character Appraisals, any archaeological studies etc.
Pegasus Planning Group for Donnington New Homes	<p><i>Response relates to land adjacent to Long Lane, Newbury</i></p> <p>The National Planning Policy Framework Draft text for consultation will affect and influence the West Berkshire Local Plan Review. This is a new version of the National Planning Policy Framework (2012), which was published on the 5th March 2018, after the Sustainability Appraisal Scoping Report was released.</p> <p>The Draft Revised NPPF alters national planning policy in several key areas, and this will need to be reflected in the Local Plan Review, as the Local Plan to 2036 has to be consistent with prevailing national planning policy. The key area which will need reviewing is the methodology for calculating Objectively Assessed Need (OAN) for new housing in the Borough. Site allocations will also need to be reviewed so that all those allocated are consistent with the aims and objectives contained within the new national planning policy.</p> <p>Reading Borough Council published its Pre-Submission Draft Local Plan on the 30th November 2017. It includes a new calculation of housing need for the Borough, and policy on the mix and tenure of new dwellings. Policy H1 states that:</p> <p>“Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.”</p> <p>Paragraph 4.4.12 states that:</p> <p>“Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation.”</p> <p>This demonstrates that Reading will require some of its housing need to be met by other authorities within the HMA. Where other authorities are meeting this need, it should be in the form of larger family dwellings. The objectives should therefore recognise the important role that West Berkshire has in meeting the needs of households not accommodated in Reading, or other parts of the HMA.</p>
Archaeology Team West Berkshire Council	<p>SEA/SA Objective 5 “To ensure that the character and distinctiveness of the natural, built and historic environment is conserved and where possible, enhanced” would be better split into the natural and historic (built being part of this). This was the advice given by Historic England (There is a danger that conflating the two could mask effects on one or the other) and we would echo this. Though the two elements are intertwined, there are different evidence bases for them, as well as legislation and planning guidance.</p> <p>Missing from the policies is the Culture White Paper 2016 – should go under National, key objectives were</p> <p>“Culture can be used in place-making, cultural attractions are the most commonly mentioned factor in terms of what makes the UK an attractive place to visit, the power of culture can drive economic growth, education and wellbeing”</p> <p>Should the emerging Vision 2036 be mentioned under Plans?</p> <p>ie</p> <p><b>Vision 2036</b> West Berkshire in 2036 where</p>

Respondent	Summary of Response
	<ol style="list-style-type: none"> <li>1. everyone benefits from a thriving economy.</li> <li>2. residents get the housing they need.</li> <li>3. individuals and communities are enabled to fulfil their potential.</li> <li>4. everyone experiences good health and wellbeing and where people are able to age well.</li> <li>5. the local environment is treasured and protected for future generations to enjoy.</li> </ol>
Public Transport Team West Berkshire Council	<p>No, I believe that through reviewing established plans such as the Local Transport Plan and related Implementation Programme, the assessment that has culminated in this Sustainability Appraisal Scoping Report has identified the key issues at a local level. In addition the document highlights the context of the National Planning Policy Framework and the Housing White Paper (2017), while also referencing in the Appendix 1 the wider global and EU policy context. The SA Assessment also flags considerations in terms of possible impact on sections of the community and on the environment, which it's noted will be subject to detailed impact assessments.</p>
Francis Connolly	<p>Policies and proposals of neighbouring authorities, particularly Reading and Wokingham. Regional and sub regional transport plans and proposals including airports and rail.</p>
Ian Campbell	<p>There is one critical objective, which can only be achieved through the pursuit of sustainable policies, which is not explicitly stated in the February 2018 draft Local Plan. As there is no evidence in this Local Plan that the intended future supply of new homes will return house prices to affordable levels, what other steps will be taken by the Council which guarantee to return house prices to their historic, equilibrium levels? Or is this not seen to be an objective of the Local Plan? If so the intention to penalise the next generation is omitted. Is this cut in their living standards fair to the next generation?</p> <p>AN OMISSION. There is a housing crisis in West Berkshire, in the Thames Valley and in much of the south east of England. It is now high on the agenda of this Government and the official opposition in Parliament. There is, in Westminster a consensus that many more homes must be built. Due to supply shortages house prices in popular areas are far too high. But the fact that the remedy lies in hands of the council through this Local Plan is not acknowledged. Denial of this consequence is timid. Without this candour, together with a solution, the Local Plan cannot be sustainable.</p> <p>It is clear from Ministerial and Prime Ministerial statements the Government sees the current planning system, possibly including this Local Plan to be part of a general planning failure.</p> <p>BROKEN? The crisis can be quantified with simplicity. Throughout most of the Thames Valley, including West Berkshire, the ratio of salaries to house prices is now about 12:1. A generation ago they were below 3:1. As house prices go up if their supply is restricted this dramatic deterioration in affordability is evidence of the consequences of several decades of restrictions on the supply of local house building land. Housing policies have progressively moved wealth from the have nots to the haves. By most planners and politicians the consequence of restricting supply was either not foreseen or was deliberately ignored. As a policy approach it is not sustainable. The system, the Government says, is broken. West Berkshire Council seems unaware this is so.</p> <p>WHO SAID WHAT. The following eight quotations chart the story of a broken housing market in the Thames Valley. In the eighties and nineties Berkshire County Council tried to slow down growth. In consequence it failed to plan far enough ahead. This is when the collapse in sustainability began.</p>

Respondent	Summary of Response
	<p>“The regional planning group (SERPLAN) is proposing what I believe is an unacceptable level of new housing in Berkshire. The task of the forthcoming consultations will be to moderate this, and yet not leave the county open to challenge.” (Coun. Phillip Houldsworth, Chairman of Berkshire County Council Environment Committee, December 1990)</p> <p>“There is widespread resistance to continuing development in many parts of the region. That resistance is informed, politically potent, and increasingly effective”. (South East Regional Planning, SERPLAN,1990)</p> <p>“It is commonly said that Berkshire suffers from the problems of success. In these circumstances it is natural to wonder what local government in general, and the County Council in particular, can do to make sense of these fast moving changes and plan for the future with any hope of success.” Foreword by R.H.Clarke, Director of Highways and Planning. Towards 2000; Shaping the Future of Berkshire. Berkshire County Council Dept. Of Highways and Planning; February 1990)</p> <p>“Historically, house prices in the South East, including Berkshire, have been high in relation to other regions in the UK. The Halifax Building Society estimate that in the fourth quarter of 1990 the average price of all houses in South East was £88,936-33% above average prices in the UK as a whole (£66,811). Yet average annual incomes in Berkshire were only 10% to 18% higher than UK equivalents. This implies that Berkshire’s residents will need to devote a higher proportion of their income to house purchase than the national average. As financial institutions will only generally lend between 2.25 and 3 times the annual household income, this suggests that households other than those on above incomes, or with substantial savings, will have difficulties in meeting the cost of house purchase in Berkshire.” ( A New Strategy for Berkshire; The Structure Plan Review: Background Paper. Population and Housing; para’s 35/36. March 1991)</p> <p>“Under provision of housing and a growing rate of household formation will result in labour shortages and a rapid increase in house prices. These impose a penalty on wage earners, whose net disposable income will be reduced as a growing percentage of their family budget is allocated to increasingly expensive accommodation. Good news for existing home owners, whose equity will increase, but rough justice for the next generation of home owners and the socially disadvantaged, unable to compete in the market place.” (Campbell Gordon, Prosperity at Risk, June 1992)</p> <p>“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is the housing is increasingly unaffordable for ordinary working class people who are struggling to get by... We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.” (Forward by Prime Minister in February 2017 White Paper, ‘Fixing up broken housing market’; DCLG)</p> <p>“ Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.” (Foreword in the same white paper by the Secretary of State for Communities and Local Government; February 2017)</p> <p>“The truth is that for, nearly 20 years, Governments of all parties and politicians of all stripes have failed to build enough new homes to meet the housing needs of our fellow citizens. We have done that even though almost every single one of us in this House knows</p>

Respondent	Summary of Response
	<p>that happy feeling of living in a home we own. In all our constituencies, for huge numbers of people we represent, the dream of home ownership has turned into a tantalising mirage-a nightmare which they can never hope to get out of. We have failed through a combination of cowardice, complacency, laziness and incomprehension.”</p> <p>(Nick Boles, MP and previous Housing Minister; Housing, Planning and Green Belt debate, House of Commons, 6 February 2018)</p> <p>MORE OMISSIONS There are other sustainable objectives that are also ignored in this Local Plan.</p> <p>What happens at the end of the Plan period? After 2036 where will new homes go after that? The Plan is silent.</p> <p>IS THERE A THREAT? The Government is committed to protecting the Green Belt. Other protected areas such as AONB, flood plains, and SSI's are also likely to remain protected in the very long term. Which suggests the remaining unprotected land is suitable for housing in the long term. The Plan does not say so. Residents ought to be told some, perhaps a great deal of West Berkshire's unprotected open countryside will eventually have to be built on, but when, where and how much being are the key issues this Local Plan fails to address. The omission is shortsighted.</p> <p>OVERSPILL There is a growing overspill problem. Reading has an overspill problem because it lacks land which is recognised by West Berkshire in the West Berkshire Spatial Framework. This is a step forward. Slough too has the same problem. Slough Council proposes a major urban extension to the north onto green belt land in adjoining council areas which those councils oppose. In east Berkshire the Duty to Cooperate is failing. West Berkshire has plenty of unprotected land. Does it also have a Duty to Cooperate with Slough Council as it has plenty of unprotected land? The Plan is silent.</p> <p>London has the same overspill problem. So too has the County of Surrey, which although mainly a dormitory area, about 90% of Surrey land is protected. Where will Surrey's overspill go in the future, after the current local plans expire? North and east Hampshire are obvious locations if Surrey's future population growth will be located close to Surrey. North Hampshire adjoins West Berkshire. Is West Berkshire talking to Hampshire councils about long term, highly sustainable new settlement solutions? If not, why not?</p> <p>London's overspill problems are unique. They are now active topics for those who look ahead. See for example 'Next-door Neighbours- collaborative working across the London boundary'; Centre for London and Southern Policy Centre., January 2018.</p> <p>West London's overspill pressures will fall first on Slough, Windsor and Maidenhead and other Surrey and Buckingham councils, who have very little unprotected land. Spatially how far does West Berkshire's Duty to Cooperate extend, to assist London? Overspill examined from a sustainability perspective suggests a high and growing obligation exists for councils with an abundance of unprotected land within easy commuting reach of London. Although this is plain to an outside observer the West Berkshire Local Plan is silent.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>An additional document that will be very relevant to the Sustainability Appraisal is the settlement boundary review that the Council is intending to undertake, which is referred to in Appendix 2 to the 'West Berkshire Local Plan Review to 2036 Scoping Report,' (February 2018) in relation to policy C1 on Location of New Housing in the Countryside. This needs to be carried out at an early stage in the Local Plan preparation as it is critical to addressing some of the key social, environmental and economic issues that have been identified as being relevant to West Berkshire including:</p> <ul style="list-style-type: none"> <li>• The allocation and phasing of the housing delivery up to 2036, that meets the predicted demand using the new, standardised way of calculating housing demand to reflect current and future housing pressures;</li> <li>• An identified shortage of affordable and/or suitable homes for local people at different stages of life;</li> </ul>



Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• Allocation of appropriate employment land;</li> <li>• Maintaining vitality of town and villages centres; (p4 &amp; 12)</li> </ul>
Natural England	Reference should be made to the Government's 25 year Environment Plan and proposed amendments to the NPPF.
Joy Schlaudraff	<p>Yes. The new draft nppf. Global issues (immigration) National need for housing/development</p>
Woolf Bond Planning for Donnington New Homes	We agree that the suggested list of relevant policies, plans, programmes, and sustainable development objectives are appropriate.
Pegasus Planning Group for Donnington New Homes	<p><i>Response relates to land adjacent to Smitham Bridge Road, Hungerford</i></p> <p>The National Planning Policy Framework Draft text for consultation will affect and influence the West Berkshire Local Plan Review. This is a new version of the National Planning Policy Framework (2012), which was published on the 5th March 2018, after the Sustainability Appraisal Scoping Report was released.</p> <p>The Draft Revised NPPF alters national planning policy in several key areas, and this will need to be reflected in the Local Plan Review, as the Local Plan to 2036 has to be consistent with prevailing national planning policy. Some of the key areas which will need reviewing are the methodology for calculating Objectively Assessed Need (OAN) for new housing in the Borough, the provision of accessible homes for older people, and the provision of green space in new developments. Site allocations will also need to be reviewed so that all those allocated are consistent with the aims and objectives contained within the new national planning policy.</p> <p>Reading Borough Council published its Pre-Submission Draft Local Plan on the 30th November 2017. It includes a new calculation of housing need for the Borough, and policy on the mix and tenure of new dwellings. Policy H1 states that: "Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period."</p> <p>Paragraph 4.4.12 states that: "Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation."</p> <p>This demonstrates that Reading will require some of its housing need to be met by other authorities within the HMA. Where other authorities are meeting this need, it should be in the form of larger family dwellings. The objectives should therefore recognise the important role that West Berkshire has in meeting the needs of households not accommodated in Reading, or other parts of the HMA.</p>

Respondent	Summary of Response
Environment Agency	<p>We are pleased to see that you have included our comments and amendments as set out in our response letter dated 25 January 2018 to the draft Scoping Report dated December 2017.</p> <p><b>Catchment Abstraction Management Strategy (CAMS)</b>  You will need to include our Catchment Abstraction Management Strategy (CAMS) to your list of policies, plans, programmes in Appendix 1. These strategies assess water availability determining how much water can be abstracted whilst leaving sufficient water within the environment to meet its ecological needs. West Berkshire falls under the Kennet and Vale of White Horse Catchment. Please use the following link to our CAMS documents on the GOV.UK website <a href="https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process">https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process</a></p> <p><b>Thames Catchment Flood Management Plan</b>  This is an overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50 to 100 years. This document should also be referred to when considering flood risk in your local plan and should be included in your list of policies, plans, programmes in Appendix 1. Please use the following link to our Thames Catchment Flood Management Plan documents on the GOV.UK website <a href="https://www.gov.uk/government/publications/thames-catchment-flood-management-plan">https://www.gov.uk/government/publications/thames-catchment-flood-management-plan</a></p> <p><b>Water Cycle Study</b>  You have said that you are considering a water cycle study as part of your evidence base. We need to know that the proposed growth within your local plan does not lead to a deterioration in water framework directive (WFD) status of the receiving rivers and that it does not prevent the future target status objectives being achieved. Infrastructure capacity is only one aspect that needs to be considered (e.g. capacity of the sewer network to accommodate the increased flows). Environmental capacity is the other key consideration which has not been assessed. For example there may be infrastructure capacity to accommodate the increased effluent, however this does not tell us if the increased effluent flow would lead to a deterioration in WFD status for ammonia, biochemical oxygen demand (BOD), and Phosphate. It is strongly recommended that a Water Cycle Study (WCS) or if appropriate a water quality assessment is completed as it will form part of the evidence base to support the local plan.</p> <p>An effective water cycle study and strategy will help achieve the following objectives:  1. New development only within environmental constraints; 2. New development in the most sustainable location, in relation to the water environment; 3. Water cycle infrastructure in place before new development is occupied and; 4. Opportunities for more sustainable infrastructure options realised. If you cannot satisfy the following questions you will need to produce a water cycle study in order for your local plan to be compliant with paragraphs 109, 158, 165 and 173 of the NPPF.  Will the proposed housing growth have a detrimental impact on water quality? · Is there sufficient environmental capacity within the receiving water environment to accommodate the resulting increase in flow and pollutant loads from the Sewage Treatment Works as the result of the planned housing growth? · If not, are there alternative discharge locations that will not cause a failure of water quality targets or cause deterioration in water quality? · Is there an increased risk of discharges from storm water overflows causing an adverse water quality impact? · Will the sewerage undertaker need to apply to increase the level of treated sewage effluent that is allowed to be discharged under the existing environmental permits, to allow for future growth? · Will the quality standard on the environmental permit need to be tightened to meet existing or future water quality standards as a result of the proposed growth (e.g. Water Framework Directive (WFD))? · Can the existing sewerage and wastewater treatment networks cope with the increased</p>

Respondent	Summary of Response
	wastewater the proposed growth will generate? As part of the duty to co-operate with neighboring authorities it is important to consider the cumulative impact of growth on the receiving water courses. For example there may be cases where more than one authority are planning on building homes within the same sewage treatment works (STW) catchment. If both are assessed in isolation, this may lead to an underestimation of the impact on the water environment. Any WCS assessment should have a joint approach and information sharing between the authorities is important.
Energy Team West Berkshire Council	<p>Reading through the scoping report there doesn't appear to be any reference or recognition of the UK Clean Growth Strategy that was published in October 2017 by the Dept for Business, Energy and Industrial Strategy. This strategy outlines the actions that the government will take to grow our national income while cutting greenhouse gas emissions. Amongst other areas it covers:</p> <ul style="list-style-type: none"> <li>• Carbon Capture and storage</li> <li>• Phasing out installation of high carbon forms of fossil fuels in new and existing business during the 2020's</li> <li>• Phasing out the installation of high carbon forms of fossil fuel in new and existing homes, starting with new homes.</li> <li>• Strengthening energy performance standards for new and existing homes under building regs INC futureproofing new homes for low carbon heating</li> <li>• Build and extend heat networks across the country</li> <li>• Ending the sale of new conventional petrol and diesel cars and vans by 2040</li> <li>• Plans for public sector to lead the way in transitioning to zero emission vehicles</li> </ul> <p>The review of WBLP should be taking all these actions into account in its function as a way of delivering the above.</p>
Mid & West Berks Local Access Forum	<p>1. The West Berkshire Rights of Way Improvement Plan will be relevant (ROWIP). Every local authority has a statutory duty it have a ROWIP – see <a href="http://info.westberks.gov.uk/article/29147">http://info.westberks.gov.uk/article/29147</a></p> <p>2. The Mid &amp; West Berks Local Access Forum would like to bring attention to its current policy on development and bring to the attention of the Council that the Forum is a <b>statutory</b> body.</p> <p style="text-align: center;"><b>MID AND WEST BERKSHIRE LOCAL ACCESS FORUM</b></p> <p style="text-align: center;"><b>Policy relating to Planning Applications for Housing, Roads, Minerals &amp; Waste sites and other industrial sites.</b></p> <p>The Forum is a statutory body set up under the CROW Act 2000 to advise local authorities and other bodies on public access, including the improvement of public rights of way for recreational and utility purposes.</p> <p>The CROW Act 2000 required all local authorities to produce a Rights of Way Improvement Plan (ROWIP) which can be found on the relevant local authority website. The plan has a number of objectives which relate to maintaining and improving the public rights of way network and also the development of new and improved public access generally.</p> <p>The Forum will consider the following when commenting on plans.</p> <p>That, the development:</p> <ol style="list-style-type: none"> <li>i. does not adversely affect existing public rights of way or other public open spaces in the area;</li> <li>ii. offers equivalent, or improved, diversion of existing public right of way affected by the development;</li> <li>iii. provides increased and / or improved off-road access to the existing public rights of way network in the area, and to existing and new facilities, open spaces and the countryside;</li> </ol>

Respondent	Summary of Response
	<p>iv. provides increased and /or improved off-road access for as many different user groups as possible, that is, pedestrians, cyclists, equestrians and disabled users;</p> <p>v. Provides paths which are definitive, rather than permissive, and are therefore added to the definitive map and statement; Conforms to the British Standard 'Gaps, Gates and Stiles' and Defra's guidance "Good practical guidance for Local Authorities on compliance with the equalities act 2010"</p> <p><b>3. We draw your attention to the DfT's document</b> 'Local Cycling and Walking Infrastructure Plans' at <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607016/cycling-walking-infrastructure-technical-guidance.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607016/cycling-walking-infrastructure-technical-guidance.pdf</a></p>
British Horse Society	<p>i. The West Berks Council Rights of Way Improvement Plan (ROWIP) is probably relevant.</p> <p>ii. Please note the policy statement of the Mid &amp; West Berks Local Access Forum on development given in its response to this consultation.</p> <p>iii. Strategy for the Horse Industry in England and Wales : <a href="https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales">https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales</a></p> <p>iv. A report of research on the Horse Industry in Great Britain <a href="https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain">https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain</a></p> <p>v. 'Making Ways for horses' by the Equestrian Access Forum <a href="http://www.bhs.org.uk/~media/bhs/files/pdf-documents/making-ways-for-horses.ashx?la=en">http://www.bhs.org.uk/~media/bhs/files/pdf-documents/making-ways-for-horses.ashx?la=en</a></p> <p>vi. The Health Benefits of Horse Riding at <a href="http://www.bhs.org.uk/enjoy-riding/health-benefits">http://www.bhs.org.uk/enjoy-riding/health-benefits</a></p> <p>It might be worth asking the British Horse Society via its Head Office for its policy statements on development relating to equestrianism / horse industry.</p> <p>Policies need to be developed <u>specific for the equestrian community</u> for the construction of equestrian accommodation (stabling, field shelters, riding arenas / indoor schools) and importantly horses need to be catered for when off road paths are considered. The viability of equestrian establishments can depend on the proximity of a good rights of way network, eg. Curridge Green Riding School.</p> <p>Focussing on where people live is reasonable but bear in mind that green infrastructure (assuming GI includes public paths and open spaces) needs to be preserved and improved from where people <b>ride</b> which is not necessarily where they live.</p> <p>The West Berks planning dept probably somehow needs to become much more familiar with equestrian issues.</p>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q2: Do you agree that the baseline data collected in Appendix 2 is appropriate to the West Berkshire Local Plan Review?

Number of responses received: 21

Respondent	Summary of Response
Stratfield Mortimer Parish Council	Yes
Carter Planning for Mr R.L.A. Jones	<p>Yes. However it would have been helpful if “housing” could follow “population”. These two topics are linked and are fundamental to the new Local Plan. It would have been useful to state that the SHMA 2016 (Strategic Housing Market Assessment) which is referred to will be regularly updated. It would also be useful to state what the OAN (objectively assessed housing need) is currently, how often and by what mechanism it will be updated in future and that it will be regularly updated to inform the new Local Plan.</p>
Burghfield Parish Council	Yes. This seems a very thorough account of where we are.
Burghfield NDP Steering Group	Yes. This seems a very thorough account of where we are.
North Wessex Downs AONB	No. Data should be spilt to show housing numbers in and outside of the AONB to be more accurate and better demonstrate pressure. Would also be helpful to show percentage increase in housing numbers and applications.
Turley Associates for North East Thatcham Consortium	<p>The Consortium have reviewed the baseline data presented within Appendix 2 of the SA Report and make the following comments to ensure that the Local Plan Review makes the maximum social, economic and environmental contribution to West Berkshire:</p> <ul style="list-style-type: none"> <li>• Page 11- 12 of Appendix 2 presents the baseline data with regards to the provision of, and access to, education within West Berkshire. The Consortium recognises the need for additional primary and secondary places across the District but notes that the baseline data with regards to current provision is focused mainly on Newbury. The Consortium believe there to be a significant historical requirement for both Primary and Secondary school places within Thatcham which can only be addressed via the provision of new development. The Consortium agrees however that the Local Plan Review must recognise the future demand for both primary and secondary school places within both Thatcham and Newbury</li> <li>• Page 12 -14 of Appendix 2 presents the current baseline situation with regards to the availability and provision of housing. The Consortium acknowledges the fact that West Berkshire is one of the most expensive places to purchase new housing outside London and recognises that demand since the recession has significantly exceeded supply. This is unlikely to change in the future. The Consortium also supports the requirement for significant additional affordable housing, particularly</li> </ul>

Respondent	Summary of Response
	<p>for local residents and key workers. The Consortium also considers that the baseline data should refer to the potential requirement across the HMA (and by definition Thatcham and Newbury as areas of focused growth) for a greater proportion of family housing given the admission by Reading Borough Council in their emerging Local Plan that their ability to deliver family housing will be constrained.</p> <ul style="list-style-type: none"> <li>• Pages 16 and 17 of Appendix 2 present the baseline data with regards to the presence of Deprivation within West Berkshire. The Consortium notes the presence of significant pockets of deprivation around Newbury and Thatcham which is notable given that they sit in relatively affluent areas. The Consortium notes that one of the factors behind this deprivation is the lack of affordable housing and key services and the Consortium therefore agrees that the SA Scoping report should identify these pockets of deprivation as a key sustainability issue to positively address.</li> <li>• The baseline data with regards to Economy and Employment does not appear to reference the latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA) which identifies the need for up to 75.2ha of additional employment land over the period to 2036. This data and indeed any other recent baseline data pertaining to the economy should be reviewed and incorporated into the scope of the SA.</li> <li>• With regards to the baseline data associated with Transportation within West Berkshire, the Consortium broadly agrees with the data provided but makes the following specific comments: <ul style="list-style-type: none"> <li>○ The commuting survey appears to be based upon the 2011 Census and should therefore be updated in order to reflect current commuting patterns.</li> <li>○ Notwithstanding the results of any new data, the Consortium recognises that a greater percentage of workers within West Berkshire utilise the private car as a means of commuting to work compared to the South East and England and Wales. Given the potential implications upon air quality and congestion (and therefore productivity) the Consortium considers that the Local Plan should focus major development in those areas with mainline train stations with access to the regional economy.</li> </ul> </li> </ul>
Woolf Bond Planning for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Historic England	We consider the baseline data for the historic environment to be comprehensive and adequate. However, on the 2017 Heritage at Risk Register there are, strictly-speaking, three listed structures, four scheduled monuments, three Registered Historic Parks and Gardens and one dual designation (listed and scheduled) deemed to be at risk. It should be noted that outside London, the Register does not include Grade II listed secular buildings. We note that the Council has not undertaken a survey of Grade II listed buildings nor has it completed Historic England's annual survey of Conservation Areas to see if any are at risk. These are, therefore, correctly identified as gaps in the baseline.
Pegasus Planning Group for Donnington New Homes	Yes – the baseline data collected in Appendix 2 covers all the relevant areas, and is appropriate to the West Berkshire Local Plan Review.

Respondent	Summary of Response
Archaeology Team West Berkshire Council	There is still a gap in terms of surveying the condition of both Grade II listed secular buildings and Conservation Areas. There is not a mechanism at the moment to assess Grade II listed buildings but Conservation Areas do need up to date Appraisals in order for their At Risk status to be determined. There is a tentative plan to address Conservation Area Appraisals – many local communities are keen to get involved.
Transport Team West Berkshire District Council	In general, I agree that the baseline data that has been collected and carefully set out in Appendix 2 is appropriate to the West Berkshire Local Plan Review. However, in relation to the section on Transport, perhaps it may be appropriate to review the percentages in terms of average delay per vehicle as a proportion of average journey time, if more recent data than that cited from the 2005 Atkins study is available.
Francis Connolly	Yes generally
Hampshire County Council	We agree that the baseline data collected in Appendix 2 is appropriate to the WBLP Review.
Ian Campbell	<p>DEFECTIVE DATA? In my comments on Question 1 above I list several omissions in the Local Plan. As this Local Plan does not provide sufficient building land to return house prices over a long period to historic normal levels this conclusion suggests the data used in the Plan preparation is not adequate.</p> <p>You list the West of Berkshire Spatial Planning Framework as one of the relevant documents. It contains two errors</p> <p>ERROR 1. It is not sustainable as it fails to put forward a strategy for a sustainable period of time in the future. In a growth area like West Berkshire a sustainable period of time must extend far beyond 2036.</p> <p>ERROR 2. It promotes a urban settlement in the countryside of 15,000 new homes. The choice of this location is a response to a commercial initiative by a consortium of land owners and builders to build on a site of their, not the four councils choice. The adoption of this land is not the result of a rational approach to a site identification exercise assessing all other sites which may be equally suitable. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the right evidence.</p> <p>UNTESTED My submission to you dated 14 January 2014 (Para. 18) said the basis of selection of countryside sites seemed crude. The new draft Local Plan does not explain the rationale for selecting open countryside sites. Unhappily there is no reason to alter this description. This exclusion is a particular concern relating to the Grazeley option, because a settlement here sets a historic precedent. It will establish the pattern for further growth in the decades after 2036. If the correct long term approach to solving the Thames Valley housing crisis is a major new settlement or urban extension in the open countryside it is especially important that the search area and the criteria for selection the location have proper regard to the long term, sustainability score of all other potential open countryside site locations sufficient to satisfy all reasonable foreseeable future housing needs. See for example the requirements mentioned in para. 6 above. In this sense context Grazeley is untested and therefore premature.</p>
West Waddy ADP for Gerald Palmer Eling Trust	The list of evidence to be collected as part of the preparation of the Local Plan Review needs to include the Settlement Boundary Review as the Council is committed to undertaking this study in the West Berkshire Local Plan Review to 2036 Scoping Report as

Respondent	Summary of Response
	<p>outlined in the response to question 1 above and also in the Housing Site Allocations DPD (adopted May 2017) which stated in paragraph 1.35 that:  <i>'All settlement boundaries, including those below the settlement hierarchy, will be reviewed through the new Local Plan.'</i>            It is also a critical piece of the evidence base for determining where housing development should go.</p>
Joy Schlaudraff	<p>Yes, in general. It does not take enough notice of national or global concerns over housing provision. It needs to be more proactive regarding enabling all suitable development, more realistic, less historic, there's no reason why historic buildings can't be conserved and enhanced within semi-rural and urban environments, as much as rural environments. Housing is basic to all. If there is not housing, people can not prosper, in ANY way</p>
Woolf Bond Planning for Donnington New Homes	<p>We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.</p>
Pegasus Planning Group for Donnington New Homes	<p>Yes – the baseline data collected in Appendix 2 covers all the relevant areas, and is appropriate to the West Berkshire Local Plan Review.</p>
Environment Agency	<p>Please be aware that you can get flood risk data from us at <a href="mailto:enquiries_THM@environment-agency.gov.uk">enquiries_THM@environment-agency.gov.uk</a></p>
Mid & West Berks Local Access Forum	<p>As far as we are aware but we note that there are a number of documents listed which we were not aware of &amp; have not read. We note, and approve of, the frequent references to green infrastructure, access to quality green space, and its importance to health and well-being.</p> <p>For example, we endorse the comments:</p> <ul style="list-style-type: none"> <li>- page 81 <i>'Planning therefore has some influence for enabling good mental health and wellbeing through helping to create access to quality green space, ....'</i></li> <li>- page 102 on Green Infrastructure the need for 'Interconnecting GI assets to form a strong GI network of green spaces and corridors which deliver the range of GI functions'</li> </ul> <p>We are a little unclear what the main purpose of Green Infrastructure is. Is it for the human population or to enhance wildlife? Biodiversity seems to be covered in its own right. Thus we advise that the main purpose of Green Infrastructure should be to provide benefits for the human population to encourage healthy outdoor activities and active travel.</p> <p>We note that it is planned to include CS12 Equestrian/ Racehorse Industry in the new plan but there does not appear to be any baseline data to support this. We understand that the horse industry contributes significantly to the national and West Berkshire economy and a significant amount of land is used by the industry. Data needs to be collected. See the submission by the British Horse Society.</p>
British Horse Society	<p>There is little baseline data included to support the inclusion of the Equestrian / Racehorse Industry (commonly called the Horse Industry).</p>



Respondent	Summary of Response
	<p>The BHS was very pleased to see the Horse Industry recognized in CS12 in the current plan. It strongly believes that the horse industry must be included in local development plans and very much hopes that the new plan will be even stronger on equestrian issues. The BHS has used the current West Berks development plan as an example to other local authorities.</p> <p>I was not involved in drawing up the current West Berks Local Development Plan and am unaware of the data which may have been collected to support the inclusion in the current plan.</p> <p>The non-racing horse industry (as well as the horse racing industry) makes a significant contribution to the economy, to employment, land use &amp; leisure activities in West Berks and to the health &amp; well-being of a wide age range of the population.</p> <p>Please note that my role within the British Horse Society (BHS), is as an Access and Bridleways officer for West Berks and southern region (Berks, Bucks, Hants, IOW, Oxon). We receive training for this role but we are volunteers. The BHS does not have planning officers and it often falls on its access &amp; bridleways officers to respond to development plans</p> <p>Nationally, the horse industry is recognized as a significant land based industry and West Berkshire is no exception. The equine industry is not just made up of the horse racing industry. It consists of professional, semi-professional and recreational riders (see pages 10 &amp; 11 in A report of research on the Horse Industry in Great Britain <a href="https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain">https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain</a>). Economic activity centres around educational establishments, livery yards, veterinary practices, farriers, forage suppliers and small parcels of land rented for the keeping of horses who may be primarily pets. There is considerable land use for livery yards which are small businesses and an important example of farm diversification scattered all over West Berkshire. In addition there are a number of equestrian centres which offer training and education. These activities need to be recognized and policies developed to support them in all local plans, from the construction of riding arenas, stabling and inclusion of provision for horses in the construction of new public paths / bridleways / green infrastructure</p> <p>With reference to the consultation document:</p> <ol style="list-style-type: none"> <li>i. the horse Industry contributes to ‘Communities and Well Being’ and ‘Economy and Infrastructure’ listed on page 9.</li> <li>ii. We are pleased to see on page 102 the need for improved equestrian access. We fully endorse this and believe the Mid &amp; West Berks Local Access Forum also supports this.</li> <li>iii. Under Future trends on pages 102 /103, <i>‘Focusing and prioritising GI investment on economic growth points where the majority of people will be located in the future to deliver multiple GI benefits’</i>, we would like to point out that there needs to be mention here on where horses are kept / where there are equestrian establishments which is often <b>not</b> where people live. We suggest an amendment along the lines of <i>‘Focusing and prioritising GI investment on economic growth points where the majority of people will be located and where there is an economic or recreational need in the future to deliver multiple GI benefits.’</i> This assumes that GI means, or includes, the provision of off-road paths, public open space etc and not just wild-life corridors with some public access. The well-being of the human population needs to be fully recognized and the contribution of the horse to human well-being recognized.</li> <li>iv. The Equestrian / Racehorse industry (horse industry) should be mentioned under ‘Rural economy and rural infrastructure’. Equestrianism uses a significant amount of the grazing land nationally and the same is likely to be true in West Berks.</li> </ol>

**Responses received to the SA/SEA Scoping Report (February 2018)****Q3: Do you have, or know of, any additional baseline data which should be added to that already listed?**

Number of responses received: 21

Respondent	Summary of Response
Francis Connolly	Not to my knowledge
Ian Campbell	<p>DEFECTIVE DATA? In my comments on Question 1 above I list several omissions in the Local Plan. As this Local Plan does not provide sufficient building land to return house prices over a long period to historic normal levels this conclusion suggests the data used in the Plan preparation is not adequate.</p> <p>You list the West of Berkshire Spatial Planning Framework as one of the relevant documents. It contains two errors</p> <p>ERROR 1. It is not sustainable as it fails to put forward a strategy for a sustainable period of time in the future. In a growth area like West Berkshire a sustainable period of time must extend far beyond 2036.</p> <p>ERROR 2. It promotes a urban settlement in the countryside of 15,000 new homes. The choice of this location is a response to a commercial initiative by a consortium of land owners and builders to build on a site of their, not the four councils choice. The adoption of this land is not the result of a rational approach to a site identification exercise assessing all other sites which may be equally suitable. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the right evidence.</p> <p>UNTESTED My submission to you dated 14 January 2014 (Para. 18) said the basis of selection of countryside sites seemed crude. The new draft Local Plan does not explain the rationale for selecting open countryside sites. Unhappily there is no reason to alter this description. This exclusion is a particular concern relating to the Grazeley option, because a settlement here sets a historic precedent. It will establish the pattern for further growth in the decades after 2036. If the correct long term approach to solving the Thames Valley housing crisis is a major new settlement or urban extension in the open countryside it is especially important that the search area and the criteria for selection the location have proper regard to the long term, sustainability score of all other potential open countryside site locations sufficient to satisfy all reasonable foreseeable future housing needs. See for example the requirements mentioned in para. 6 above. In this sense context Grazeley is untested and therefore premature.</p>
West Waddy ADP for Gerald Palmer Eling Trust	Yes, the results of the Settlement Boundary Review, which is still to be undertaken, for the reasons given in the responses to questions 1 & 2.
Natural England	Baseline data with more of a specific focus around development pressures within the AONB (e.g. with regards to numbers and percentages of housing and other non-housing related planning applications coming forward within the AONB and outside of it) could be integrated into the SA scoping in order to clearly understand the baseline with regards to development within this protected landscape.

Respondent	Summary of Response
Joy Schlaudraff	Yes. There are many unidentified sites, because there are no free or cheap assessments by the council
Woolf Bond for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Pegasus Planning Group for Donnington New Homes	No – I am not aware of any additional baseline data which should be added to that listed.
Stratfield Mortimer Parish Council	<p>Not being expert in any of the fields mentioned, it is difficult to say that a precise piece of data has not been used. However, it is clear that the following issues do not appear to be covered by any of the data listed:</p> <p><b>Population</b></p> <ul style="list-style-type: none"> <li>• While the fact of an ageing population is covered it would seem that there is no data on what such a population would like to see happen. For instance they might seek to down-size at a particular point in life. Are there no such attitude surveys?</li> <li>• This is a general point about all the issues. There seems to be little or no information on what people actually want, now or in the future, as opposed to simply extrapolating existing statistics.</li> </ul> <p><b>Health</b></p> <ul style="list-style-type: none"> <li>• There is virtually nothing in this section about mental health</li> <li>• There seem to be a mix of value judgements and statistics that reduce the section's impact.</li> <li>• There does not seem to be any information on NHS and other health providers plans</li> <li>• There is little or no background on trends in delivery of medical services such as the use of remote monitoring of conditions</li> <li>• There is very little on the impact of environmental conditions on health or indeed cross-referencing to other issues</li> <li>• Again this last issue is prevalent through all of this appendix</li> </ul> <p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Should there not be a data set on health and air quality?</li> </ul> <p><b>Education</b></p> <ul style="list-style-type: none"> <li>• There is no mention of changing educational practices such as internet learning</li> <li>• There is no mention of apprenticeships and this route to qualifications</li> <li>• There is no mention of the need to retrain for different jobs as the 'job for life' disappears.</li> <li>• In general terms this section confines itself to those educational needs that are met, in some way, by WBC and does not take a more wide-ranging view.</li> <li>• There is little or no cross referencing to other sections where education is important such as Health</li> </ul> <p><b>Housing</b></p>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• There does not seem to be any data on housing construction such as the increasing use of factory built homes.</li> <li>• Nor does there seem to be any data on the type of buildings required to minimise the environmental footprint of housing</li> <li>• Little cross-referencing to other issues such as flooding</li> </ul> <p><b>Deprivation</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Crime</b></p> <ul style="list-style-type: none"> <li>• No mention is made of the national crime survey where individuals are asked about their experiences of crime in the last year. This gives a different picture to police crime statistics. Indeed police crime trend figures are well known to be suspect as the basis for recording has changed over time.</li> </ul> <p><b>Sport</b></p> <ul style="list-style-type: none"> <li>• Mortimer has commissioned a consultant to report on sport in and around the parish and this can be made available if required.</li> <li>• There are no figures showing the correlation between sporting activity and health, especially for the older members of society</li> <li>• While this section is entitled community sport and leisure facilities there is no real mention of leisure facilities which, presumably, would include everything from pubs to cinemas.</li> <li>• There is no mention of the myriad of clubs that cater for specific interests from gardening to chess.</li> <li>• There is no mention of informal leisure facilities such as recreation grounds and open countryside</li> </ul> <p><b>Landscape</b></p> <ul style="list-style-type: none"> <li>• There is no mention of landscape as an aid to better health</li> <li>• The characterization of landscape into the very broad categories does not do justice to the very varied landscapes held within each category</li> <li>• There is a presumption that this only concerns the rural areas. Surely the urban landscape is just as important?</li> </ul> <p><b>Geology</b></p> <ul style="list-style-type: none"> <li>• Would it be appropriate to deal with Hydrology in this section?</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Commons</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• There does not seem to be any information on the overall current state of biodiversity.</li> <li>• The emphasis is all on protected areas and species. It is believed that WBC hold records of species identified in the District.</li> <li>• Should the Lawton report be mentioned?</li> </ul> <p><b>Green Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Should designated Green Spaces be mentioned and how many there are in the District?</li> </ul>

Respondent	Summary of Response
	<p><b>Climate</b></p> <ul style="list-style-type: none"> <li>• There is no mention of the likely impact that climate change will have on health.</li> </ul> <p><b>Water quality and contaminated land</b></p> <ul style="list-style-type: none"> <li>• Should the future trends cross-reference to climate change?</li> </ul> <p><b>Water supply</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Various papers have been published on the impact of short high intensity storms affecting impermeable areas be these man made or simply very dry ground. These intense events can be just short periods of rainfall or intense events within a longer storm. It is considered that these events need to be considered when assessing the sustainability of any policy or proposal.</li> </ul> <p><b>Soil</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Previously developed land</b></p> <ul style="list-style-type: none"> <li>• The future trends section is confusing. If it is saying that brownfield sites may increase in number why would the use of green field sites increase as a result? If this is because of a general decrease in the availability of other windfall sites where is the evidence and is this the correct place to mention it?</li> </ul> <p><b>Minerals</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Waste</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Renewable energy</b></p> <ul style="list-style-type: none"> <li>• There does not seem to be a recognition that in the future there will be increasing need for electricity as renewables provide that form of energy and the use of electric vehicles will put demand on a much higher plane. There is likely to be demand for ancillary facilities as well as generating capacity, for example, large scale electricity storage (battery) plants.</li> </ul> <p><b>Economy</b></p> <ul style="list-style-type: none"> <li>• There is mention of the road network but not the rail network.</li> <li>• There is no mention of broadband provision which is now an exceptionally important determinant of good prospects for the economy of an area.</li> <li>• There is no mention of the problems faced due to increased congestion on all transport networks or the opportunities offered by rail electrification</li> <li>• There is little or no cross-referencing to other sections such as education and health</li> <li>• There seems to be no recognition of how work will change due to greatly increased use of Artificial Intelligence</li> </ul> <p><b>Tourism</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Agriculture</b></p>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• It is noticeable that this is the first time that Brexit has been mentioned. In reality might this not affect a number of sections in the analysis?</li> </ul> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• There is no mention of the impact of the increasing use of electric vehicles on transport or indeed the use of autonomous vehicles.</li> <li>• The mention of reductions in usage by home working is welcomed but this depends on good access to broadband and this is not mentioned.</li> <li>• There is mention of the encouragement of active transport modes but very little information on the location of this.</li> <li>• There is little cross-referencing, for instance to the minerals section where the reuse of materials for roads could be important or public rights of way that encourage walking and health.</li> <li>• There is little or no mention of freight transport</li> </ul>
Carter Planning for Mr R.L.A. Jones	No but any future Neighbourhood Plans will need to be included
Burghfield Parish Council	No
Burghfield NDP Steering Group	No
North Wessex Downs AONB	No. Although Horse racing industry is an important sector of West Berkshires economy and data from this could be incorporated if viable.
Turley for North East Thatcham Consortium	<p>With regards to the SA Process beyond this Scoping Report, the Consortium acknowledges that the Council will be updating its evidence base in support of the Local Plan Review and therefore assumes that West Berkshire Council will amend the baseline data and key sustainability issues in light of any new evidence.</p> <p>The Consortium's response to Question 2 above has highlighted a number of new sources of baseline data which are considered to be helpful to the SA Process. These are:</p> <ul style="list-style-type: none"> <li>• The latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA)</li> <li>• The Reading Pre-Submission Local Plan (2017) and particularly paragraph 4.4.12 which states the need for greater number of family housing within the Western Berkshire HMA.</li> </ul>
Pro Vision for Audley Group	<p>Particularly in the context of West Berkshire's ageing population being above the national average, it would be appropriate to include reference to the following House of Commons report published last month: <i>Housing for Older People, Second Report of Session 2017-19; Communities and Local Government Committee (5 February 2018).</i></p>

Respondent	Summary of Response
Woolf Bond Planning for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Pegasus Planning Group for Donnington New Homes	No – I am not aware of any additional baseline data which should be added to that listed.
Archaeology Team West Berkshire Council	Another form of primary evidence we use is LiDAR data supplied by the Environment Agency – work by the Council's GIS team has turned this into Hillshade models available on corporate mapping. This display both surface and terrain topography and is valuable for many areas (eg for flooding assessments) as well as for our purposes in identifying archaeological earthworks.
Transport Team West Berkshire Council	<p>In addition to the telephone information service (Traveline) for bus times that is referenced in Appendix 2, in line with the Local Transport Plan Policy on Information, through partnership working with Reading Transport Limited, live local bus information is also available via Traveline's NextBuses mobile internet and text service, and via Traveline South &amp; East's and individual transport operators' apps (e.g. the free 'Kennections' app). Service status and disruption updates are also now available via social media, including via Twitter feeds integrated into apps.</p> <p>Further, Reading Transport have now taken on the maintenance of nine on-street audio-visual screens at bus stops served by their routes, and are currently working with the Council to introduce audio-visual information on board the Kennections local bus fleet.</p> <p>During 2017, local bus services were enhanced with the introduction of contactless bankcard payment and mobile ticketing on routes radiating from Newbury operated by Kennections (under contract to WBC), by Reading Buses, and by Stagecoach South. GWR are also introducing contactless payment to their ticket machines at key stations including Newbury.</p>
Mid & West Berks Local Access Forum	Not that we are aware of but see answer to Q2.
British Horse Society	<p>Up-to-date data specific for West Berks may be difficult to obtain. National data on the importance of the Horse Industry is more readily available although some of it is rather out of date.</p> <p><b>West Berks-Specific data:</b></p> <p><b>1. The National Equine Database / Central Equine database.</b></p> <p>In theory, this should allow an estimate of the economic value of the horse industry to be calculated in West Berks. Further information may be available via <a href="https://data.gov.uk/dataset/national-equine-database-ned">https://data.gov.uk/dataset/national-equine-database-ned</a></p> <p>Legally, every horse has to have a passport. In the past, the number of passports by postcode was available from the National Equine database. Data obtained by the Society in 2011 showed that 16,711 horses were registered with RG postcodes. The British</p>

Respondent	Summary of Response
	<p>Equestrian Trade Association (see below) estimated that in 2015 each horse costs £3,600 pa to keep. Thus, the economic value of horses kept in RG postcodes equated to <u>£60 million per annum</u> at that time period. Others claim the BETA figure is an underestimate.</p> <p>The National Equine Database was discontinued and as far as we are aware up-to-date figures are not available to the public. The Society understands that a Central Equine Database is planned but has little information about it.</p> <p>It might be worth West Berks Council asking Defra for advice on how it should calculate the economic value of the horse industry in West Berks. Also it might be worth contacting the CEO at the BHS Headquarters: The British Horse Society, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2XZ</p> <p><b>2. Conduct a survey / snapshot of equestrian enterprises in West Berkshire.</b></p> <p>It may, perhaps, be necessary for the Council to conduct a survey /snapshot of non-racing equestrian enterprises in West Berkshire to gain an estimate of the size of the horse industry.</p> <p>There are numerous enterprises throughout West Berks which contribute to the equestrian economy. These include: equestrian centres, livery yards, veterinary practices, farrier services, forage suppliers etc. ( see below, National data 2a below for the range of the horse industry nationally).</p> <p>For example,</p> <p>(i) there are at least 4 large equestrian <b>veterinary practices</b> in West Berks. These might be a source of the number of horses kept to owners with West Berks postcodes.</p> <p>(ii) a ridden horse will usually be shod by a <b>registered farrier</b> every 5-8 weeks. The number of registered farriers in West Berks might be available from the Farriers Registration Council and an estimate of the average number of horses on each farriers' books obtained. Both these are likely to give an under estimate of the number of horses kept in West Berks but may serve as an estimate.</p> <p>(iii) <b>Licensed riding schools:</b> these may seriously underestimate the horse population if they do not include livery yards and private premises</p> <p>3. For the <b>importance / economic value of horse racing in West Berks</b>, the British Horse Racing Board may be a source of information.</p> <p><b>National data:</b></p> <p>We are aware of the following:</p> <p>1. <b>British Equestrian Trade Association's National Equestrian Survey 2015</b>  <a href="http://www.beta-uk.org/pages/industry-information/market-information.php">http://www.beta-uk.org/pages/industry-information/market-information.php</a>  Taken from the website: <i>'This highlights new spending patterns and changing trends over the past five years to provide an insight into the equestrian sector today. Key findings include: Nationally, the economic value of the equestrian sector stands at £4.3 billion of consumer spending across a wide range of goods and services each year. This has increased from £3.8 billion in 2011. <b>Riding for pleasure, at 96%</b>, was the most popular equestrian activity, with 59% of riders taking part in non-affiliated competitions.'</i></p> <p>It may be that BETA may have data specific to West Berkshire which it may release on application</p> <p>2. <b>British Horse Industry Confederation reports published 2004 /2005.</b></p> <p>a. <a href="https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain">https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain</a>. See the diagrams on pages 10 &amp; 11 which depict the breadth of the Horse industry which also will relate to West Berks.</p>



Respondent	Summary of Response
	<p>b. A summary this report is available at <a href="http://www.ridingsafely.net/defrabhicssummary1.html">http://www.ridingsafely.net/defrabhicssummary1.html</a>. I have a paper copy</p> <p>c. Strategy for the Horse Industry in England &amp; Wales  <a href="https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales">https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales</a></p> <p><b>3. The Health Benefits of Horse Riding</b></p> <p>In 2010, the BHS commissioned the University of Brighton, in partnership with Plumpton College, to research the physical health, psychological and well-being benefits of recreational horse riding in the United Kingdom. The report is available at <a href="http://www.bhs.org.uk/enjoy-riding/health-benefits">http://www.bhs.org.uk/enjoy-riding/health-benefits</a></p> <p>4. <a href="https://www.lantra.co.uk/">https://www.lantra.co.uk/</a> may have useful data.</p> <p>It should be noted that the agriculture data provided by Defra is unlikely to include equestrian activities as most horses in the UK are not classified as an agricultural animal. However, many farms have diversified into livery yards (places where horse owners pay to keep their horses often on a DIY basis) and the income from this is a source of income. The livery costs range from around £200 to £800 a month per horse.</p>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q4. As far as you are aware, are there any inaccuracies or anomalies in the data presented?

Number of responses: 17

Respondent	Summary of Response
Stratfield Mortimer Parish Council	No apart from the lack of cross-referencing and surveys of public opinion of the existing situation and their aspirations.
Carter Planning for Mr R.L.A Jones	No.
Burghfield Parish Council	No
Burghfield NDP Steering Group	No
North Wessex Downs AONB	No
Turley Associates for North East Thatcham Consortium	Other than the comments presented above, the Consortium has not identified any specific inaccuracies or anomalies however it is noted that some of the baseline data sources were utilised in support of the adopted Core Strategy and therefore we fully support the Council's commitment to a new and revised evidence base as part of the development of the Local Plan Review
Woolf Bond Planning for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Pegasus Planning Group for Donnington New Homes	No – I am unaware of any inaccuracies or anomalies in the data.
Archaeology Team West Berkshire Council	I believe the historic environment section is reasonably accurate – but NB the HER is continually being updated.
Public Transport Team West Berkshire Council	No
Francis Connolly	Not to my knowledge

Respondent	Summary of Response
Ian Campbell	<p>DEFECTIVE DATA? In my comments on Question 1 above I list several omissions in the Local Plan. As this Local Plan does not provide sufficient building land to return house prices over a long period to historic normal levels this conclusion suggests the data used in the Plan preparation is not adequate.</p> <p>You list the West of Berkshire Spatial Planning Framework as one of the relevant documents. It contains two errors</p> <p>ERROR 1. It is not sustainable as it fails to put forward a strategy for a sustainable period of time in the future. In a growth area like West Berkshire a sustainable period of time must extend far beyond 2036.</p> <p>ERROR 2. It promotes a urban settlement in the countryside of 15,000 new homes. The choice of this location is a response to a commercial initiative by a consortium of land owners and builders to build on a site of their, not the four councils choice. The adoption of this land is not the result of a rational approach to a site identification exercise assessing all other sites which may be equally suitable. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the right evidence.</p> <p>UNTESTED My submission to you dated 14 January 2014 (Para. 18) said the basis of selection of countryside sites seemed crude. The new draft Local Plan does not explain the rationale for selecting open countryside sites. Unhappily there is no reason to alter this description. This exclusion is a particular concern relating to the Grazeley option, because a settlement here sets a historic precedent. It will establish the pattern for further growth in the decades after 2036. If the correct long term approach to solving the Thames Valley housing crisis is a major new settlement or urban extension in the open countryside it is especially important that the search area and the criteria for selection the location have proper regard to the long term, sustainability score of all other potential open countryside site locations sufficient to satisfy all reasonable foreseeable future housing needs. See for example the requirements mentioned in para. 6 above. In this sense context Grazeley is untested and therefore premature.</p>
West Waddy ADP for Gerald Palmer Eling Trust	No
Joy Schlaudraff	<p>Yes.</p> <p>Paragraph 55 of the current nppf, lends great scope to West Berkshire. More notice should be taken of it, its spirit for all developments, not just single dwellings. This was not the point of the paragraph spirit.</p> <p>Paragraph 95 of draft nppf, and all the new draft nppf, should be given great weight.</p> <p>It updates us all with the real needs of real people; historic landscape character is all very well, but we need to house people. The land is for the people, not the people for the land</p>
Mid & West Berks Local Access Forum	Not that we are aware of but we are not familiar with a number of the documents listed.
British Horse Society	Not as far as the Society is aware.

**Responses received to the SA/SEA Scoping Report (February 2018)****Q5: Do you agree that these are the key sustainability issues for the West Berkshire Local Plan Review?**

Number of responses: 21

Respondent	Summary of Response
Stratfield Mortimer Parish Council	Please see response to question 3
Carter Planning for Mr RLA Jones	Yes – the key sustainability issue is future housing needs and how they will be met. Perhaps Housing should be a specific Thematic Topic rather than being part of Communities and Well Being. Housing is the single most important issue and yet the paragraph on it does not specifically refer to overall housing needs being met but concentrates on the more detailed matters of income levels, the size of houses and old persons accommodation.
Burghfield Parish Council	Yes: the key sustainability issues for West Berkshire are covered. However, the statement should be more proactive in identifying and addressing emerging changes to some of these issues. For example in relation to waste management there is now a growing awareness of the environmental damage arising from discarded plastics. Our emerging Local Plan should therefore be seeking to discourage the unnecessary use of plastics, to increase the range of plastics that are recycled, and to seek to contain other waste plastics to ensure that they do not reach, particularly, the marine environment.
Burghfield NDP Steering Group	Yes: the key sustainability issues for West Berkshire are covered. However, the statement should be more proactive in identifying and addressing emerging changes to some of these issues. For example in relation to waste management there is now a growing awareness of the environmental damage arising from discarded plastics. Our emerging Local Plan should therefore be seeking to discourage the unnecessary use of plastics, to increase the range of plastics that are recycled, and to seek to contain other waste plastics to ensure that they do not reach, particularly, the marine environment.
North Wessex Downs AONB	No. Landscape pressure should also include climate change and biodiversity should include flooding.
Turley Associates for North East Thatcham Consortium	The Consortium has reviewed the key sustainability issues within Table 2 of the SA Scoping report and save for the comments provided in Question 6 (below) agrees that (based on the baseline data provided) these represent the key sustainability issues for the West Berkshire Local Plan Review. The Consortium acknowledges that any new baseline data may warrant a further review of the key sustainability issues.
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.

Respondent	Summary of Response
Pegasus Planning Group for Donnington New Homes	Yes – these are the key sustainability issues for the West Berkshire Local Plan Review. Specifically, increasing the supply of housing and flood risk should be given considerable weight when considering the key sustainability issues. This is because they have been given continuing or increased significance in the revised NPPF.
Archaeology Team West Berkshire Council	<p>Under Landscape, Townscape and Cultural Heritage - Landscape – agree with these Historic Character and Features – what is meant by the word ‘features’? It’s not used anywhere else. Should be replaced by ‘Heritage Assets’</p> <p>This text “The conservation of historic, sites and commons, monuments, battlefields, parks, buildings and Conservation Areas has contributed to the historic, cultural, economic heritage of West Berkshire and helped to sustain the distinctive communities in the District” could be improved – change to “Sustainable management of historic sites (monuments, buildings and structures) and landscapes (battlefields, parks and gardens, Conservation Areas) contributes to the social, cultural and economic vitality of West Berkshire and helps to maintain the distinctive communities in the District”</p> <p>We wonder why the paragraph on nuclear safety is included in this section?</p>
Public Transport Team West Berkshire Council	<p>Yes, I agree that the issues identified are the key sustainability considerations for the Review.</p> <p>In respect of “increased availability of transport links” being identified within the SA Scoping Report as a means of addressing rural social isolation, it is vital that stakeholders appreciate the associated financial implications,</p> <p>In relation to Economy and Infrastructure, in parallel with encouraging use of more sustainable transport modes including buses, train, walking and cycling in particular for urban journeys, close consideration should be given to bidding for significant funds (e.g. Major Roads Network funding to deliver wider ranging development of strategic roads, including new links, so as to take inter-urban and long-distance through traffic further away from West Berkshire’s main settlements, thereby reducing the environmental impact for the District.</p>
Francis Connolly	<ul style="list-style-type: none"> <li>• Generally yes</li> <li>• The Grazely area proposals for 15,000 new homes should be investigated for further development for say up to 25,000 new homes. Cognisant of the good transport links including public transport, (rail and fast bus)</li> <li>• Greater commitment to affordable and starter homes with guarantees on delivery</li> </ul>
Hampshire County Council	We agree that the issues outlined in Appendix 2 are key sustainability issues for the West Berkshire Local Plan Review.
Ian Campbell	Community wellbeing is given as the first sustainable thematic topic. You mention there are a number of factors that are important to enable everyone to fully participate in society, which impact on the housing issue. In particular an ageing population is identified as an issue, with the over 65’s forecast to grow by 59% in the period 2016-2036 and the over 85’s by 148% in the same period, both above the national average. The Plan points to a much increased demand for suitable housing bearing in mind the wish of these age groups to retain independence. It also highlights the impact of the house prices being now amongst the highest in the UK for key

Respondent	Summary of Response
	<p>occupational workers. Finally the Plan notes the high dependency on private transport and the implications of a car dependency on emissions and air quality.</p> <p>SHORT-SIGHTED. This analysis high lights trends in house prices and transport but makes no attempt to quantify any of the outcomes at the end of the Plan period in 2036. What will prices be in 2036? This is a gap. It also fails to look further ahead by another 20 or 40 years to the 2080's. From a sustainability perspective this is a big hole in shrewd thinking.</p> <p>LIMITATIONS It is certain that most predictions in the Plan will be wrong. This is not a criticism. It is a reflection on incomplete base data, and changing circumstances. The prudent way forward is to plan for a range of outcomes, not one selected outcome. Which is why a sustainable local plan must look much further ahead. It must look at long term trends, and solutions. For example 60year potential housing locations and the infrastructure they will demand if dependency on private cars is to be significantly constrained. These long term perspectives are omitted. They are the essence of sustainable planning. If their inclusion exceeds the council's authority then the Council must notify the Government its housing aspirations cannot be achieved without new local powers. Ignoring the dilemma, or hoping that they can be delivered is not sufficient. Other councils are grappling with these challenges. West Berkshire's approach is not apparent. (See Planning Resource, How a group of Oxfordshire councils secured £215m. of government infrastructure cash; 8 February 2018; by Stuart Watson).</p>
Thatcham Town Council	Yes
West Waddy ADP for Gerald Palmer Eling Trust	<p>Yes, particularly the comment on housing, which states that:</p> <p><b><i>'Housing: The higher than average annual income, and house prices now amongst the highest in the UK, have particularly affected key occupational workers and potential first time buyers who are unable to get onto the property ladder. The lack of smaller sized as well as affordable dwellings for predicted lower density households is an issue for the future, particularly in relation to rural areas and in retaining younger local people employed in the District. The increasing number and proportion of older persons and those with long term needs places more demand for housing and accommodation that is available and/or adaptable for different stages of life.'</i></b></p> <p>This emphasises the importance of making housing provision in rural areas particularly for occupational workers; first time buyers and affordable housing. A key tool in identifying how this can be done will be the Settlement Boundary Review, which is still to be undertaken and therefore needs to be a priority.</p>
Joy Schlaudraff	<p>Yes, but there is far too much emphasis on key point 1 which is blocking nearly all development. This needs to be taken away or highly trimmed.</p> <p>Key point 2 is much more to the point regarding current day needs. (Enable provision of housing in sustainable locations, and reduce inequality)</p>
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.
Pegasus Planning Group for Donnington New Homes	Yes – these are the key sustainability issues for the West Berkshire Local Plan Review. Specifically, housing for an aging population, increasing the supply of housing, culture (tourism), community uses, and green infrastructure should be given considerable weight

Respondent	Summary of Response
	when considering the key sustainability issues. This is because they have been given continuing or increased significance in the revised NPPF.
Environment Agency	For the above question you should consider adding in another sustainability issue which is conservation and enhancement of river corridors which includes their ecological buffer zones from the top of the river bank. These are usually 8-10 metres in width.
Mid & West Berks Local Access Forum	Yes, they seem appropriate. We particularly endorse the frequent reference to the importance of well-being and the role of green infrastructure. Green Infrastructure might be strengthened by making it an objective in its own right rather than combining it with Biodiversity. The health of the human population is of high significance and the importance of healthy outdoor exercise is increasingly being recognized.
British Horse Society	Yes, they seem appropriate. We note reference to equestrian sporting prowess under ' <b>Landscape, Townscape and Cultural Heritage</b> ' and draw your attention to points above on how data might be collected, if required.

**Responses received to the SA/SEA Scoping Report (February 2018)****Q6: Are you aware of any issues which, in your opinion, should be added, or any that should be removed?**

Number of responses received: 19

Respondent	Summary of Response
Francis Connolly	<ul style="list-style-type: none"> <li>• The Greater Reading Area (West Berks, RBC and Wokingham BC) development should be planned comprehensively</li> <li>• South Newbury development should also consider the adjacent North Hampshire area.</li> </ul>
Ian Campbell	<p>Community wellbeing is given as the first sustainable thematic topic. You mention there are a number of factors that are important to enable everyone to fully participate in society, which impact on the housing issue. In particular an ageing population is identified as an issue, with the over 65's forecast to grow by 59% in the period 2016-2036 and the over 85's by 148% in the same period, both above the national average. The Plan points to a much increased demand for suitable housing bearing in mind the wish of these age groups to retain independence. It also highlights the impact of the house prices being now amongst the highest in the UK for key occupational workers. Finally the Plan notes the high dependency on private transport and the implications of a car dependency on emissions and air quality.</p> <p>SHORT-SIGHTED. This analysis high lights trends in house prices and transport but makes no attempt to quantify any of the outcomes at the end of the Plan period in 2036. What will prices be in 2036? This is a gap. It also fails to look further ahead by another 20 or 40 years to the 2080's. From a sustainability perspective this is a big hole in shrewd thinking.</p> <p>LIMITATIONS It is certain that most predictions in the Plan will be wrong. This is not a criticism. It is a reflection on incomplete base data, and changing circumstances. The prudent way forward is to plan for a range of outcomes, not one selected outcome. Which is why a sustainable local plan must look much further ahead. It must look at long term trends, and solutions. For example 60year potential housing locations and the infrastructure they will demand if dependency on private cars is to be significantly constrained. These long term perspectives are omitted. They are the essence of sustainable planning. If their inclusion exceeds the council's authority then the Council must notify the Government its housing aspirations cannot be achieved without new local powers. Ignoring the dilemma, or hoping that they can be delivered is not sufficient. Other councils are grappling with these challenges. West Berkshire's approach is not apparent. (See Planning Resource, How a group of Oxfordshire councils secured £215m. of government infrastructure cash; 8 February 2018; by Stuart Watson).</p>
Thatcham Town Council	<p>Inclusion of 'Provision for Young People' as a sustainability issue  'Affordable Housing' as a separate issue that is distinct from wider 'Housing'  'Flood Risk' to also incorporate 'Flood Prevention'</p>
West Waddy ADP for Gerald Palmer Eling Trust	No



Respondent	Summary of Response
WYG for Donnington New Homes	<p>Donnington New Homes is supportive of the approach set out in the Sustainability Appraisal Scoping Report and considers that the objectives and issues which have been identified, provide an appropriate way in which to assess the sustainability of policies and proposals in the new local plan. In particular, SA Objectives 1 (to enable the provision of housing to meet identified need in sustainable locations) and 4 (to promote and maximise opportunities for all forms of safer and sustainable travel) are welcomed. Table 2 identifies Key Sustainability Issues for the district. These include specific housing pressures including an ageing population, affordability and the way in which the high cost of housing will result in problems with staff recruitment and retention, affecting not only the local economy but also the vitality and vibrancy of the district</p> <p>Table 2 also identifies that a sustainable transport system can have both economic and environmental benefits. It is believed that the proposed urban extension at Sandleford Park South can make an important contribution to addressing these issues and meeting the SA Objectives. The development of Sandleford Park, as set out in adopted policy CS3 and the Sandleford Park SPD and now being brought forward by planning applications submitted in March 2018, will deliver up to 1,500 new homes and support a range of options for sustainable travel. These include footpaths and cycle routes as well as the phased provision of bus services, ultimately routing through the site from Monks Lane to Andover Road.</p> <p>The proposed southern extension to Sandleford Park will help deliver up to 500 additional homes in a sustainable location, maximising opportunities for sustainable travel and helping meet the objectives proposed in the SA Scoping Report. Its allocation will also mean that about 2,000 dwellings will be delivered at Sandleford Park. <i>[Please see attached document for further details of the site]</i></p>
Joy Schlaudraff	<p>Yes ! See above question 5. What has been termed a key sustainability issue, isn't in fact a sustainability issue. It is an issue of the historic landscape and non-built environment.</p> <p>However, if small major development (between 25-50 houses) were allowed, on all suitable sustainable location sites, in close proximity to Rural Service Centres eg Burghfield Common and Theale, this would sort the housing crisis, before it overcomes us. If looked into many of these sites are, in fact, suitable for development. We just don't like change. Once its happens, we'll adjust to it.</p> <p>If we don't make some areas now semi-rural in development, the housing crisis will overtake us, and we could end up with urban environments, instead of more balanced semi-rural ones, where there is a good balance between nature and houses, with houses in beautiful surroundings. What not to like?</p> <p>Paragraphs 80 – 85 of the new draft nppf, should be given great weight</p>
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.
Pegasus Planning Group for Donnington New Homes	No – I am not aware of any issues that should be added or removed.
Environment Agency	For the above question you should consider adding in another sustainability issue which is conservation and enhancement of river corridors which includes their ecological buffer zones from the top of the river bank. These are usually 8-10 metres in width.

Respondent	Summary of Response
Julian Worth	As indicated in response to Qu1, mineral extraction, which impacts significantly on the subjects considered in the Local Plan, notably landscape and water. In general, extraction in new areas should be opposed - alternative sources of aggregates are available, notably through the Theale rail depots, and despoilation of West Berks can be avoided by making greater use of these alternatives
Stratfield Mortimer Parish Council	Please see response to question 3. In particular the need to include other infrastructure requirements such as good broadband and those associated with quickly changing transport trends such as electric and autonomous vehicles. The inclusion of more social attitude surveys would help identify what people actually want as opposed to simply extrapolating existing trends.
Carter Planning for Mr R.L.A. Jones	No.
Burghfield Parish Council	One of the biggest local issues we currently face is the low proportion of affordable housing being constructed, in part because developers are able escape from their responsibilities by claiming lack of viability. This problem needs to be urgently addressed with central Government.
Burghfield NDP Steering Group	One of the biggest local issues we currently face is the low proportion of affordable housing being constructed, in part because developers are able escape from their responsibilities by claiming lack of viability. This problem needs to be urgently addressed with central Government. We should also seek to address the issue of sustainability in the longer term. We can not go on allocating additional land for housing and other development every few years. We need to work locally and nationally to find a way of curbing the need for continuing to build on agricultural and other greenfield land.
North Wessex Downs AONB	Green Infrastructure should not simply be about new routes/links it should also focus on improving existing routes and links within both rural and built environments, such as the river corridor/canal.
Turley for North East Thatcham Consortium	<p>The Consortium considers that the following amendments and additions to the key sustainability issues should be undertaken by West Berkshire Council which, in turn, should result in policies that secure greater economic, social and environmental benefit:</p> <ul style="list-style-type: none"> <li>• Communities and Well Being (Education/ Skills) – There is an acute need for additional Primary and Secondary School places within Newbury and Thatcham</li> <li>• Communities and Well Being (Housing) - In addition to a significant need for both private and affordable housing there is also a greater need for the provision of family housing within West Berkshire as a result of Readings provision of a greater number of flats</li> <li>• Communities and Well Being (Deprivation) – There is a need to positively address the areas of deprivation within the District with an opportunity in Thatcham and Newbury for new development to provide long term benefits</li> <li>• Communities and Well Being (Community Facilities) – There is a need to ensure appropriate community and leisure facilities are provided across West Berkshire in line with projected growth of both housing and the economy.</li> </ul>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• Climate Change and Resource Efficiency (Climate Change) – Significant reductions in Greenhouse Gas emissions can be secured through the location of major new development in sustainable locations which include those that provide the most opportunity for the use of sustainable modes of transportation.</li> <li>• Economy and Infrastructure (Employment Land) – Recent evidence indicates a need for the provision of employment land which in combination with growth in housing could result in an increase in commuting within the District through more sustainable modes of transportation</li> <li>• Economy and Infrastructure (Sustainable Transport) – To reduce reliance on the private car, development should be located in areas whereby key services, facilities and employment opportunities are accessible by sustainable modes of transportation such as train, bus, cycling and walking.</li> </ul>
Planning Transport Team West Berkshire Council	No
Mid & West Berks Local Access Forum	It must be recognized that development should not compromise existing ‘green infrastructure’ without replacement of green infrastructure which is equivalent or better than existing (see the MWBLAF policy above). Focussing on where people live is reasonable but bear in mind that green infrastructure needs to be preserved and improved from where people take exercise which is not necessarily where they live, eg. to public open spaces, such as commons, where many dogs are exercised; from equestrian livery yards where horses are kept. Integration of off-road access within and from new developments by the thoughtful provision of off-road paths where they are required, and in the context of existing open spaces and the rights of way network, will help discourage car use to popular sites.
British Horse Society	<p>It is essential that the horse industry is fully recognized, based on sound evidence, as contributing to the economy, leisure &amp; recreation, health and well-being in all the appropriate local plans <b>IF</b> it is to thrive and continue to contribute to the West Berks economy. Plans need to refer to the provision of equestrian accommodation (from professional establishments which offer training, to livery yards and use of individual fields where field shelters may be required) and places to ride including public paths / bridleways and other open spaces. So often, my experience is that inclusion of equestrians, particularly on new paths, has to be fought for with each application or project even though equestrian needs are recognized in the current West Berkshire Active Travel Plan &amp; Local Development Plan. Walking &amp; cycling is automatically catered for as a hopeful means of alternative travel even without evidence that the provision of cycle paths has significantly increased cycling uptake.</p> <p>It should be noted that the urban fringe is a popular place for equestrian establishments because many horse riders live in urban areas and <u>not</u> at the premises where horses are kept. Thus equestrian establishments on the urban fringe can be under threat from housing developments and need protection. A prime example of an establishment close to an urban location is Hall Place Equestrian Centre located in Tilehurst and on the fringe of the population of Reading (<a href="http://hallplaceequestriancentre.co.uk">http://hallplaceequestriancentre.co.uk</a>). Another is the carriage driving centre at Sheldon Farm, Tidmarsh and Celebration Carriages at Poplar Farm, Cold Ash (<a href="http://www.celebration-carriages.co.uk">http://www.celebration-carriages.co.uk</a>). Such establishments need recognition &amp; protection as they contribute to the economy, employment, health &amp; well-being of the human population.</p>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q7: Are the objectives suitable in the context of the West Berkshire Local Plan Review?

Number of responses received: 19

Respondent	Summary of Response
Francis Connolly	As my answer under question 6 for the area south of M4 J11
Hampshire County Council	Yes, the objectives are suitable in the context of the WBLP Review.
Ian Campbell	<p>The Local Plan seems to set in place a a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature.</p> <p>As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
West Waddy ADP for Gerald Palmer Eling Trust	Yes
Joy Schlaudraff	See above 2 answers. No. The first objective isn't. Its overdone, and out of date. See draft paragraphs 80- 85 of the new draft nppf.

Respondent	Summary of Response
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Pegasus Planning Group for Donnington New Homes	Yes – these objectives appear suitable in the context of the review.
Energy Team West Berkshire Council	<p>Headline Objective 4 talks about maximising the opportunity for all forms of safe and sustainable travel BUT there is no mention of Low Emission Vehicles (LEV) in any of the detail and this is potentially a massive omission in terms of the way in which existing and future UK strategy / legislation / fiscal incentives are focusing on the adoption of low emission vehicles and associated infrastructure. If not under Objective 4 then LEV and associated infrastructure should be considered under Objective 9.</p> <p>Consider whether the first sub-category under Headline Objective 8 (To reduce energy use and promote the development and use of sustainable /renewable energy technologies) could be further split to reflect the relative importance and differences of these areas, and to allow more specific indicators to be adopted, for example:</p> <ul style="list-style-type: none"> <li>a) To reduce Energy Use (reduce kWh),</li> <li>b) Promote the use of new or preferred energy technologies ('Smart' towns)</li> <li>c) Promote the use of renewable energy generation and energy storage</li> </ul>
Stratfield Mortimer Parish Council	<p>As far as the objectives are concerned it could be argued that some of them are contradictory, but this may well be intentional and acceptable. For example, to promote the opportunity for travel may contradict the aim of conserving and enhancing the natural environment.</p> <p>Of more significance is the objective of promoting and maximising opportunities for all forms of safer and sustainable travel. Surely in sustainability terms should not the first action be to minimise the need to travel? Only when a trip is necessary should it be safe and sustainable.</p> <p>Similarly should not the objective about emissions start off with eliminating the need for unnecessary emissions before going any further?</p>
Carter Planning for Mr R.L.A. Jones	<p>Yes. As stated meeting housing needs is considered to be the single most important objective in the District.</p> <p>We support the Number 1 SA Objective being the provision of housing to meet identified needs in sustainable locations.</p>
Burghfield Parish Council	Yes. It is particularly good to see reference to the need to increase energy storage from renewable technologies (page 24) in ways that may become available from current research into battery power and other areas. This should enable us to store energy harvested from solar power and wind for use during periods of darkness and calm conditions, and may thus substantially increase the proportion of the energy we use that is derived from renewable resources.
Burghfield NDP Steering Group	Yes. It is particularly good to see reference to the need to increase energy storage from renewable technologies (page 24) in ways that may become available from current research into battery power and other areas. This should enable us to store energy harvested from solar power and wind for use during periods of darkness and calm conditions, and may thus substantially increase

Respondent	Summary of Response
	the proportion of the energy we use that is derived from renewable resources. One action we could take now would be to provide facilities for charging car batteries in new developments.
North Wessex Downs AONB	Yes, how the objectives will be achieved is another matter.
Turley for North East Thatcham Consortium	The Consortium has reviewed the SA Objectives and notwithstanding our comments in response to Question 8 considers them to be broadly suitable in the context of the West Berkshire Local Plan Review. As stated above, it is possible that the objectives may need amendment following the identification of new baseline data or evidence further into the Local Plan Review process.
Historic England	We are pleased to see the historic environment included in a Sustainability Objective. However, we would prefer a separate objective specifically for the historic environment/ heritage assets – the natural and historic environments are both significant matters in their own right, worthy of separate consideration. There is a danger that conflating the two could mask effects on one or the other. Whether a separate objective or not, reference should be made to the significance/special interest of the historic environment/heritage assets – the significance/special interest is what is important about heritage assets and what should be conserved or enhanced (as well as the asset itself).
	Yes – these objectives appear suitable in the context of the review.
Archaeology Team West Berkshire Council	‘To protect, and enhance the built and historic environment including heritage assets’ – don’t consider that the word built is necessary as this is a sub-set of the historic environment
Mid & West Berks Local Access Forum	They seem so. We particularly support inclusion of objective H ‘Green Infrastructure & healthy Living’ as a distinct objective.
British Horse Society	Yes

### Responses received to the SA/SEA Scoping Report (February 2018)

**Q8: Are there any other additional objectives that should either be included or are there any that should be removed?**

Number of responses received: 20

Respondent	Summary of Response
Francis Connolly	Not at present
Ian Campbell	<p>The Local Plan seems to set in place a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature. As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
West Waddy ADP for Gerald Palmer Eling Trust	Not that I am aware of.
Joy Schlaudraff	<p>Yes. We should have an objective to do our bit, to help the nation and ourselves supply enough housing.</p> <p>We admit shamelessly that we are one of the UKs most wealthy regions, yet we are appearing to be very selfish in our refusal to put beautiful housing in beautiful surroundings for others, before historic conservation.</p> <p>The first objective should either be removed, or put last on the list of priorities.</p>

Respondent	Summary of Response
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Pegasus Planning Group for Donnington New Homes	Yes – given the value of tourism to the economy, a new objective should be added regarding improving and promoting opportunities for tourism in West Berkshire.
Julian Worth	Reduction and elimination of mineral extraction which is a highly damaging and unsustainable activity
Stratfield Mortimer Parish Council	There does not seem to be an overall vision/objective which puts these objectives in context. Without such a context it is difficult to determine if there are any missing objectives because the totality of the aim of the analysis is not stated. However, even without such an overall objective it is evident that specific objectives concerned with happiness, community spirit and health and wellbeing would start to bring into play the aspirations of individuals and communities. It is considered important that the individuals aspirations are considered as they are the ultimate beneficiaries of good policies.
Carter Planning for Mr R.L.A. Jones	No.
Burghfield Parish Council	There should be a stronger statement under objectives about the importance of maintaining and enhancing the local environment. What at present appears under G. does not quite fill the bill because not all that we might wish to conserve is part of our “local distinctive character and identity”. Perhaps begin this section “To conserve and enhance the distinctive and otherwise desirable features of the built, historic and natural environment.....”.
Burghfield NDP Steering Group	There should be a stronger statement under objectives about the importance of maintaining and enhancing the local environment. What at present appears under G. does not quite fill the bill because not all that we might wish to conserve is part of our “local distinctive character and identity”. Perhaps begin this section “To conserve and enhance the distinctive and otherwise desirable features of the built, historic and natural environment.....”.
North Wessex Downs AONB	No. Objectives should always aim to enhance rather than simply conserve and where possible enhance, each development should provide a net gain to landscape character and biodiversity. Pg 25 last few paragraphs state that impacts on the natural environment are heavily dependent on the siting and type of development, it should also include scale and design. Objective G should include environment in the title
Turley for North East Thatcham Consortium	The Consortium does not consider that any additional objectives are warranted however we do have a number of suggested amendments and additions to the sub-objectives and indicators used to assess the impact upon the SA objective. For ease of reference our suggested amendments are placed here acknowledging that this responds to Questions 8 and 9 and which are as follows:



Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• <b>SA Objective 1-New Sub objective:</b> The Consortium suggests the inclusion of a new sub-objective as follows; <ul style="list-style-type: none"> <li>○ To locate new development in sustainable locations with access to an appropriate range of services and facilities through sustainable modes of transportation <ul style="list-style-type: none"> <li>▪ Suggested Indicators – Allocation in accordance with the Settlement Hierarchy; Services and Facilities accessible by sustainable modes of transportation such as walking, cycling and public transportation</li> </ul> </li> </ul> </li> <li>• <b>SA Objective 2:– New Sub objective:</b> The Consortium suggests the inclusion of a new sub- objective as follows; <ul style="list-style-type: none"> <li>○ To tackle deprivation and inequality in the District <ul style="list-style-type: none"> <li>▪ Suggested Indicators – Proximity to deprived areas; the use of specific measures to tackle deprivation including employment and training opportunities</li> </ul> </li> </ul> </li> <li>• <b>SA Objective 3- New Indicator:</b> The Consortium suggests the inclusion of a new indicator to measures the success of this SA Objective which is as follows: <ul style="list-style-type: none"> <li>○ Number of new primary or secondary school places provided by the proposed development</li> </ul> </li> <li>• <b>SA Objective 4 – New Indicator:</b> In order to encourage and identify new development in the most sustainable locations the Consortium suggests the inclusion of a new indicator within SA Objective 4 which is as follows: <ul style="list-style-type: none"> <li>○ Percentage of new development within walking or cycling distance of a train station</li> </ul> </li> <li>• <b>SA Objective New Indicator:</b> The Consortium suggests the following indicator <ul style="list-style-type: none"> <li>○ Percentage of new development within walking or cycling distance from an existing town centre</li> </ul> </li> <li>• <b>SA Objective 8 – Amendments to existing indicators:</b> In order to align with national policy for sustainable design and construction and to utilise metrics that allow the assessment of a wide range of development types and sizes, the Consortium suggests the following amendments to the indicators associated with SA Objective 8: <ul style="list-style-type: none"> <li>○ % of commercial buildings meeting either BREEAM Very Good or Excellent standard</li> <li>○ % of energy generated from renewable or low carbon energy sources</li> </ul> </li> </ul> <p>The Consortium considers that the amendments below will allow for a more effective implementation of the SA Framework for both policies and proposed allocations however we reserve the right to make further comments once we have reviewed the methodology deployed to update the Settlement Hierarchy and carry out the assessment of each proposed allocation. Key to SA objectives 1 and 4 are the distances utilised to measure the sustainability of a proposed location with respect to key services and facilities. It is also appropriate to acknowledge the potential benefits of multi-modal travel which may involve a short walk to a bus stop and then a longer journey to a key destination but which can be regarded as a sustainable travel choice. Within the SA methodology deployed it will also be important to understand the role of mitigation such as sustainable travel plans which can significantly improve the sustainability of a sites location but which is not apparent should the assessment rely on existing baseline or GIS data.</p>
Pro Vision for Audley Group	<p>With reference to comments on behalf of Audley Group on the Local Plan Review, the Sustainability Appraisal (SA) Objectives should also include supporting sustainable development in the rural areas. The SA objectives do not distinguish between the urban and rural areas despite the different sustainability considerations in these areas.</p>

Respondent	Summary of Response
	<p>The benefit of appropriate development in the rural areas should not be underestimated. Paragraph 28 of the NPPF states that LPAs should:“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.”</p> <p>And“promote the retention and development of local services and community facilities in villages, such as shops, meeting places, sports venues, cultural buildings, public houses and places of worship”.</p> <p>This theme is expanded in the Draft Revised NPPF under the sub-heading “Supporting a prosperous rural economy”.</p> <p>Draft paragraph 85 states:</p> <p><i>“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist”.</i></p> <p>The sustainability objectives for the revised local plan, which form the foundation to the revised policy, should therefore be explicit in recognising the different challenges and opportunities in the rural areas of the district.</p>
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Historic England	<p>The key emerging local level objectives for the historic environment should be summarised as “conserve and enhance the historic environment”.</p> <p>We welcome West Berkshire Local Plan Review Objective G, although it should also refer to the significance/special interest of heritage assets (what it is that makes them important).</p>
Pegasus Planning Group for Donnington New Homes	No- we are not aware of any additional objectives that should either be included or removed.
Archaeology Team West Berkshire Council	It is dismaying seeing that Culture has the highest number of impacts from other objectives classed as ‘neutral’, or the other way round, the lowest number of positive impacts from the other objectives set out in the SA and the Local Dev Plan. This is noted in the text, but no mitigation is suggested. We should be looking particularly at improving communication between parties involved in delivering each objective so as to manage this as best as we can.
Transport Team West Berkshire Council	No
Mid & West Berks Local Access Forum	Nothing has come to mind so far.



### Responses received to the SA/SEA Scoping Report (February 2018)

**Q9: It may be necessary to rank the objectives to assess options. Do you have any comments on those which hold particular importance?**

Number of responses received: 20

Respondent	Summary of Response
Francis Connolly	Most important is to ensure deliverability
Ian Campbell	<p>The Local Plan seems to set in place a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature. As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
Thatcham Town Council	Housing should be a priority given the national need for more house building.
West Waddy ADP for Gerald Palmer Eling Trust	Housing is of particular importance as it is not only needed to ensure a good standard of living but is an essential requirement. It should therefore be given the highest ranking.
Joy Schlaudraff	<p>Yes !</p> <p>The whole chart (Summary of Key Emerging Local Level Objectives, at end of Appendix 1) has got the priorities back to front !</p>

Respondent	Summary of Response
	<p>The objectives are right in the main, but should read from bottom to top, not top to bottom. They should read:</p> <ul style="list-style-type: none"> <li>Economy and Infrastructure</li> <li>Communities and Wellbeing</li> <li>Climate change and resource efficiency</li> <li>Biodiversity and green infrastructure</li> <li>Landscape, townscape and cultural heritage</li> </ul> <p>Read them through in that order, and it all makes more sense. This would be far more successful and address needs quickly. Agriculturally poor land, in addition, should be allowed to develop, where in sustainable locations, and not have to be a designated official farm, in order to diversify. That is just ridiculous</p>
Woolf Bond Planning for Donnington New Homes	<p>We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.</p>
Pegasus Planning Group for Donnington New Homes	<p>SA Objective 1: 'To enable provision of housing to meet identified need in sustainable locations' should be considered the most important objective. The core tenet of the NPPF is the presumption in favour of sustainable development, as the government attempts to increase the supply of housing. The Local Plan to 2036 will likely have a higher OAN when it is calculated using the government's new standardised method, meaning that more sites will need to be allocated for housing in the Local Plan to 2036. The objective within this, 'To enable provision of housing to meet all sectors of the community, including those with specialist requirements' is also very important. The Draft Revised NPPF reiterates the importance of providing more accessible housing units for older people, and this objective will help this to be achieved. However, it would be helpful if more specific reference could be added to meeting the needs of older people.</p> <p>SA Objective 2: 'To improve health, safety and wellbeing and reduce inequalities' is also a very important objective. As more housing is developed, and areas become denser, it is more important than ever that green space exists to be used by those who do not easily have access to it at home. The objective within this, 'To enable the protection and enhancement of high quality multi-functional green infrastructure across the District' reiterates that protecting existing green space, and creating new, useable green space, is an essential part of new development.</p> <p>SA Objective 3: 'To improve access to education, health and other services' is also an important objective. Given growing populations and the quantity of new housing being developed, community uses are extremely valuable for maintaining existing communities, and bonding new communities together.</p>
Stratfield Mortimer Parish Council	<p>There does not seem to be an overall vision/objective which puts these objectives in context. Without such a context it is difficult to rank objectives as they all contribute differently to different aspirations. With such an overall vision/objective the public may be able to make informed choices. This is not the case at present.</p>

Respondent	Summary of Response
	For instance if the overall object is to be able to sustain a better lifestyle without putting future generations at risk then objective 7 seems to have little bearing.
Carter Planning for Mr R.L.A Jones	The Respondent supports the Council's objectives. In particular the Respondent fully supports the Number 1 objective "To enable the provision of housing to meet identified need in sustainable locations". This should remain the Number 1 objective of the new Local Plan.
Burghfield Parish Council	All ten objectives are very important, and we would not wish to rank them. Indeed, they could be listed in alphabetical order to emphasise that they are not ranked.
Burghfield NDP Steering Group	All ten objectives are very important, and we would not wish to rank them. Indeed, they could be listed in alphabetical order to emphasise that they are not ranked.
North Wessex Downs AONB	Yes as one of the greatest pressure is on the natural environment from housing, objective G should be high on the agenda along with objective H and C, whereby efficient use of existing vacant sites are sought first for development before greenfield sites.
Turley for North East Thatcham Consortium	<p>The National Planning Policy Framework (NPPF) and the proposed revisions both state that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>Paragraph 8 of the proposed Revisions to the NPPF state that the three pillars (economic, social, environmental) of sustainable development should be pursued in mutually supportive ways.</p> <p>With this statement in mind, the Consortium considers that it is difficult to rank the SA objectives in accordance of importance given that all represent the three pillars of sustainable development which must be pursued jointly. As an example, the provision of additional private and affordable housing within the District is an absolute priority social and economic priority yet the SA Scoping Report recognises that this might result in some environmental impacts which, following mitigation could be acceptable to West Berkshire.</p> <p>In practical terms the Consortium recognises that this may require qualitative judgement by the SA Practitioner of the impacts and benefits from any policies or proposed allocations upon the SA objectives. It is therefore of fundamental importance to the SA and Local Plan Review Process that the methodology and conclusions of each key stage of the Local Plan Review are transparent and available for public consultation.</p> <p>Of particular interest to the Consortium will be the methodology deployed by the SA to assess all of the <i>reasonable alternatives</i> (site allocations) to deliver the housing and employment need within the District. There is an established body of case law and best practice to ensure that the SA makes a positive contribution to the selection of the most sustainable options for development within a Local Plan.</p> <p>The Consortium would be pleased to liaise further with West Berkshire Council during the development of the SA Process and Local Plan Review in order to ensure it is robust and in accordance with the necessary guidance and legislation.</p>
Pro Vision for Audley Group	Meeting the accommodation and care needs of the ageing population, which is noted to be higher than the national average in West Berkshire (Sustainability Scoping Report: Table 2, page 17), should be one of the key priorities for the Local Plan Review. Failure to

Respondent	Summary of Response
	prioritise this issue is likely to have a significantly detrimental affect on the overall housing provision, health and social well-being in the district.
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Historic England	If it is necessary to rank the objectives to assess options, then we consider that Objective 5 should be accorded particular importance, having regard to statutory requirements regarding listed buildings, scheduled monuments and conservation areas and the clear indications in the National Planning Policy Framework that heritage assets should be conserved and enhanced.
Pegasus Planning Group for Donnington New Homes	SA Objective 1: 'To enable provision of housing to meet identified need in sustainable locations' should be considered the most important objective. The core tenet of the NPPF is the presumption in favour of sustainable development, as the government attempts to increase the supply of housing. The Local Plan to 2036 will likely have a higher OAN when it is calculated using the government's new standardised method, meaning that more sites will need to be allocated for housing in the Local Plan to 2036. SA Objective 9: 'To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change', and the objective within this, 'To sustainable manage flood risk to people, property and the environment' also hold a particular importance. Given the changing climate, and the more frequent occurrence of major flooding events, it is becoming increasingly important to ensure that new development mitigates any potential flood risk to itself, and where possible, reduces flood risk for surrounding areas as well.
Transport Team West Berkshire Council	The Objectives that in my view hold particular importance are: Objective 10: to support a strong, diverse and sustainable economic base which meets identified needs – on the grounds that the ability to deliver against other objectives is likely to be reliant upon economic performance; Objective 1: to enable provision of housing to meet identified need in sustainable locations – on the grounds that ensuring the availability of housing – of suitable quality - in appropriate, accessible places is intrinsically linked to economic performance and social cohesion. Objective 3: to improve accessibility to community infrastructure; Objective 4: to promote and maximise opportunities for all forms of safe and sustainable travel; Objective 2: to improve health, safety and well-being and reduce inequality - Again these objectives are inter-related; the establishment of and continued support for more sustainable modes of transport under Objectives 3 and 4 can contribute to reducing inequality as well as improving access and enhancing economic opportunities.
Mid & West Berks Local Access Forum	The Forum is not convinced that ranking distinct objectives is appropriate as each is important in its own right. However, it might be noted that it is often said that good health is the most important aspect of life and thus objective H should have a high priority.
British Horse Society	We are not sure this is a valuable exercise as each objective is important in its own right.

### Responses received to the SA/SEA Scoping Report (February 2018)

**Q10: Do the indicators provide a relevant measure for the associated objectives? If not, then please suggest additional indicators.**

Number of responses received: 21

Respondent	Summary of Responses
Francis Connolly	Generally yes
Ian Campbell	<p>The Local Plan seems to set in place a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature. As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The housing indicators are:</p> <ul style="list-style-type: none"> <li>• No of housing completions</li> <li>• Affordable housing completions</li> <li>• Housing mix by type and size</li> </ul> <p>These are not sufficient on their own but need to be measured against housing need for each of the sub areas including the rural areas to ensure that housing provision is distributed across the District, including in rural communities, and that the key sustainability issues arising from a lack of housing for key occupational workers; first time buyers and affordable housing are addressed.</p>



Respondent	Summary of Responses
Joy Schlaudraff	<p>Yes and no.                      The lower objectives should have a higher priority as before said, and the objectives should be ranked differently.                      Bottom to top.                      And the first objective should be left off, as we are giving it far too great place.</p>
Woolf Bond Planning for Donnington New Homes	<p>We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.</p>
Pegasus Planning Group for Donnington New Homes	<p>Many of the indicators do provide a relevant measure for the associated objectives. However, some objectives do require additional indicators if they are to be judged correctly.                      Objective 2(3), 'To enable the protection and enhancement of high quality multifunctional green infrastructure across the District' currently does not include an indicator regarding allotments. It is suggested that an additional indicator is added for this objective, which states 'Number of allotments'. This is because allotments are extremely valuable for many people, especially those who are older, who do not have easy access to a garden. As densities increase, the demand for allotments is rising as people seek an area of green space that they can make their own. They are an important part of the overall provision of Green Infrastructure in West Berkshire, and should be considered as such.</p>
Environment Agency	<p>Under objective 9: "To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change". There is sub heading called "To sustainably manage flood risk to people, property and the environment". There are indicators for the objective concerning flood risk. One of these indicators says,                      "No of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds"                      We think this should read:                      "No of planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds"                      This objective should also include an indicator for no inappropriate development within the floodplain. This follows the guidance for flood risk in the Planning Practice Guidance. Table 3 'Flood Risk vulnerability and flood zone compatibility shows which development vulnerability category from table 2 should not be permitted in certain flood zones.                      There should also be an indicator about the avoidance of development in the Flood Zones. This ties in with the requirements of the flood risk sequential test.                      Under objective 5 another indicator to add in should be "conserve and enhance ecological /wildlife corridor value of watercourses and their ecological buffer zones."</p>
Energy Team West Berkshire Council	<p>Headline Objective 1 should be more than just about meeting identified need through the number of affordable homes completed.                      This indicator focuses on the ability for individuals to buy (capital) the house without considering if they can afford to 'run' (revenue) the house. The area of West Berkshire whilst considered affluent still has a number of fuel poverty areas and with increasing energy prices, alongside slow wage growth, this issue could potentially worsen across the district without the proper strategic intent and planning. The WBLP review would not be expected to provide the solution on its own but is an important 'tool' as part of the solution.</p>

Respondent	Summary of Responses				
	<p>As indicated under the response to question 7, there should be an indicator included under Objective 4 (or Objective 9) that measures the adoption and use of Low Emission Vehicles and their associated infrastructure. For example:                      “Number of EVs registered in WBC”                      “Number of public charging points available in West Berks”                      Under Objective 8, the indicator ‘Megawatts generated from renewable energy sources’ needs clarification. Is this associated with housing developments or an indicator for the district in its own right? If associated with housing developments then it could be argued that this indicator favours larger developments in that it would be easier for them to achieve any target just through the adoption of one technology such as solar PV. Depending on whether this is a district or housing development indicator, it may be more useful to put such an indicator into context by changing the terminology to something along the lines of:                      “% of total energy consumption for the district coming from local renewable energy generation” OR                      “% of the total energy consumption for the housing development coming from on-site renewable energy generation”.</p>				
Julian Worth	Reducing tonnage of minerals extracted in West Berks, year-on-year				
Stratfield Mortimer Parish Council	<p>Picking up the point from the previous question, if there was an explicit overall objective it would be a lot easier to see if the indicators were relevant to not only the particular objective but to the overall context of the analysis. Some of the objectives do not seem to be consistent across the page. For instance</p> <table border="0" data-bbox="568 660 2148 1335"> <tr> <td data-bbox="568 660 873 1335"> <p><b>7: To promote and improve the efficiency of land use.</b></p> </td> <td data-bbox="873 660 1164 1335"> <p>To maximise the use of previously developed land and buildings where appropriate</p> </td> <td data-bbox="1164 660 1478 1335"> <ul style="list-style-type: none"> <li>• Percentage of major residential developments completed at: i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph</li> <li>• Percentage of new or converted dwellings and non-residential developments on previously developed land</li> <li>• Area of registered brownfield sites suitable and available for residential development</li> </ul> </td> <td data-bbox="1478 660 2148 1335"> <p><b>Material Assets Soil</b></p> </td> </tr> </table>	<p><b>7: To promote and improve the efficiency of land use.</b></p>	<p>To maximise the use of previously developed land and buildings where appropriate</p>	<ul style="list-style-type: none"> <li>• Percentage of major residential developments completed at: i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph</li> <li>• Percentage of new or converted dwellings and non-residential developments on previously developed land</li> <li>• Area of registered brownfield sites suitable and available for residential development</li> </ul>	<p><b>Material Assets Soil</b></p>
<p><b>7: To promote and improve the efficiency of land use.</b></p>	<p>To maximise the use of previously developed land and buildings where appropriate</p>	<ul style="list-style-type: none"> <li>• Percentage of major residential developments completed at: i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph</li> <li>• Percentage of new or converted dwellings and non-residential developments on previously developed land</li> <li>• Area of registered brownfield sites suitable and available for residential development</li> </ul>	<p><b>Material Assets Soil</b></p>		

Respondent	Summary of Responses
	<p>In this example it would appear that the objective is about using previously developed land. However one of the indicators is about densities which has nothing to do with previously developed land. Either the objective should explicitly include a mention of increased densities or the density indicator should be removed.</p> <p>Some of the items in the table are not fully related. For instance</p> <ul style="list-style-type: none"> <li>• Percentage of development incorporating water conservation and/or water efficiency measures</li> <li>• New Developments with SUDs installed (EA)</li> </ul> <p>To reduce water consumption and promote reuse</p> <p>The use of SUDs as an indicator is only marginally relevant as SUDs normally relate to the discharge of surface water not consumption by individuals.</p> <p>This example also illustrates a more general point that many of the indicators measure inputs or outputs as opposed to outcomes. Hence it is perfectly possible to measure the number of dwellings with water efficiency measures installed (an input measure) but how these are used may mean that they are just encouraging people to use more water. A better measure would be simply to measure the amount of water consumed in the District (an outcome measure). While it is recognised that moving to outcome measures does involve a different mind-set from that employed traditionally to derive indicators or measures research has shown that there are marked benefits from doing so.</p> <p>Another example is objective 9 where the number of SUDs schemes on new developments is a measure. All this does is measure the ‘capping’ of a problem and does nothing to address the outcome which would be for less dwellings overall to be subject to flooding by 2036. Without such outcome measures there is virtually no challenge to policy makers to consider what policies can be derived which make overall improvements to the life of all residents.</p> <p>In objective 3 which is about accessibility to community infrastructure should there not be an indicator which covers cultural venues to create a measure for the new culture strategic objective? In the same section why is it only new residential development that is mentioned in terms of accessibility? Surely the provision of new facilities to assist all the residents of an area is more important. Indeed restricting any indicator to new development effectively creates a double standard and should be avoided. Another example is objective 9 where many of the indicators are all about new developments when the whole of the area should be considered.</p>
Carter Planning for Mr R.L.A. Jones	Yes
Burghfield Parish Council	The list looks pretty comprehensive.

Respondent	Summary of Responses
Burghfield NDP Steering Group	The list looks pretty comprehensive.
North Wessex Downs AONB	Think the indicators suggested will provide a basic baseline for the future SA/SEA
Turley for North East Thatcham Consortium	Please see the Consortiums response to Question 8.
Pro Vision for Audley Group	With reference to the National Planning Policy Guidance (NPPG) (NPPG Paragraph: 037 Reference ID: 3-037- 20150320), it would be appropriate to amend the ‘suggested indicators’ for SA Objective 1 (To enable provision of housing to meet identified need in sustainable locations) as follows: “Number of housing units for older people <b><i>including Use Class C2</i></b> ” (our emphasis).
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Pegasus Planning Group for Donnington New Homes	Yes - the indicators do provide a relevant measure for the associated objectives.
Transport Team West Berkshire Council	Yes, the indicators appear to provide relevant means of measurement against the identified objectives.
Mid & West Berks Local Access Forum	We think that the indicators under 2 (To enable the protection and enhancement of high quality multi-functional GI ) could be strengthened to measure the value of public rights of way and public open space to communities. We might work with the Council to identify indicators. So, often, these facilities are the Cinderella but they provide places for healthy outdoor exercise, free at the point of use and thus available for a wide range of socio-economic groups and for a wide variety of activities (walking, dog walking, horse riding, jogging, cycling, carriage driving).
British Horse Society	An indicator needs to be included which measures the importance to the equestrian community of public rights of way and open spaces open to equestrians (eg. commons) and any other places open to them so that these important facilities do not get overlooked in future development plans.

## Responses received to the SA/SEA Scoping Report (February 2018)

### Q0: Other comments

Number of responses received: 7

Respondent	Summary of Response
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the scoping reports
Wokingham Borough Council	Thank you for consulting Wokingham Borough Council on the Local Plan Review to 2036 Scoping Report and SA Scoping Report for West Berkshire. WBC has reviewed these documents and does not wish to make any comment at this stage. We welcome this local plan review, and look forward to future progress on the Sustainability Appraisal and future consultations for the new plan.
Historic England	General advice on Sustainability Appraisal and the historic environment is set out in Historic England's Advice Note 8 "Sustainability Appraisal and Strategic Environmental Assessment": <a href="https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a> .
Ian Campbell	<p>SUMMARY</p> <p>It is not simple in a council area with a strong growth trademark, where past policies are rooted in long running council wishes to slow growth and stop change in the open countryside, to strike an enduring balance between the two opposing desires. Long entrenched resistance to change results in shortages of homes at affordable prices. Priorities must change.</p> <p>This draft Local Plan fails to address the core issues. It is my opinion Thames Valley growth pressures will continue far into the future. Falls in immigration will not off-set the impact of an ageing population or the magnetic effect of London, now a city of world appeal. Central government will come under increasing pressure to force the building of many more new, affordable homes to manage the numbers of alienated young, frustrated unsuccessful first time buyers urgently, currently unable to follow their parents example. This frustration will grow and impact on future housing policies.</p> <p>West Berkshire, and its neighbours in the western region need to be match or be ahead of Whitehall thinking. Looking ahead for example, what happens to places like West Berkshire when interest rates start to return to historic norms? And what happens when places like London, Slough and Surrey run out of unprotected land? Where will their overspill go? What happens if longevity increases? What happens if high levels of immigration continue?</p> <p>These are the questions a sustainable local plan must ask and answer. To produce a sustainable Local Plan for a target area like West Berkshire with lot of well-located unprotected land this Local Plan must, as the Duty to Cooperate expects, must look far ahead and seek ways of helping neighbours whilst profiting in the process locally too.</p> <p>If the West of Berkshire Spatial Framework is the first phase of a regional masterplan for central Thames Valley, and this can be demonstrated to the Inspector the Plan may be sound. Are all the elements tested? Is there evidence to support them? It is not apparent in this Local Plan.</p>

Respondent	Summary of Response
	<p>There is way forward. The SHMA figures, if rolled forward suggest at least 200,000 new homes will be needed in the Thames Valley over the 60/70 year's ahead. This means finding a location in the Thames Valley for a new Milton Keynes with local support. With foresight this is possible. To win local support some policy changes will be necessary. They can be summarised as follows</p> <ul style="list-style-type: none"> <li>~ a plan for the period 2036-2086;</li> <li>~ cross-party politically support locally, to match the Westminster consensus;</li> <li>~ cross-border cooperation regionally;</li> <li>~ agreement that nationally protected areas remain unchanged;</li> <li>~ future major new development will be directed to unprotected countryside;</li> <li>~ new settlements or urban extensions will be medium and high density, highly accessible by public transport with low or very low private car ownership.</li> <li>~ existing land owners cooperation is vital. This will be achieved by ensuring loss of longterm development rights causes no financial loss, and the value of existing use rights will increase through improvements to the compulsory purchase code.</li> <li>~ land value capture is included in the next Local Plan., together with an enhanced compensation code for land owners and introduction of financial compensation to local residents in host areas.</li> </ul> <p>Those who say this approach fails to address the short term supply deficit do not understand the market. Existing land owners, seeing a new political consensus on future land supply, and no prospect of policy U-turns will accelerate existing land supply pipelines as the competitive impact of a new supply sources becomes clear.</p> <p>Appendix provided as part of the representation which sets out some details about the respondent and their background. *Not made publicly available.</p>
Natural England	<p>Natural England would like to would like to see specific reference made to water quality of the River Kennet SSSI and the River Lambourn SSSI/SAC designated sites within the document.</p> <p>These designated sites should be given particular consideration (and be monitored through the appropriate indicators), due to their sensitivity to high phosphorus concentrations and subsequent vulnerability with regard to package treatment plant and septic tank usage.</p> <ul style="list-style-type: none"> <li>• Green Infrastructure should focus on improving existing routes and links within both rural and built environments, and not just creating new ones. Existing green linear features should be considered such as river corridors and existing canal networks and enhanced wherever possible, thus contributing to the council's commitment to providing biodiversity net gain.</li> <li>• In the last few paragraphs of Page 25, it is stated that impacts on the natural environment are heavily dependent on the siting and type of development. This should also reference scale and design of developments (with regards to potential effects on both biodiversity and landscape).</li> </ul>
Bracknell Forest Borough Council	<p>Part of your Borough is seemingly within 5 km and within 7km of the Thames Basin Heaths SPA. The implications are that developments up to 7km may need to provide mitigation measures. It is advisable that you contact Natural England (NE) on this matter. It should be noted that the Habitat and Species Regulations have been updated, with the most recent regulations published in 2017. Bracknell Forest Council is currently agreeing a methodology with NE regarding the air quality assessment which will be</p>

Respondent	Summary of Response
	<p>undertaken as part of the HRA for the Bracknell Forest Local Plan which will include an in-combination assessment. We look forward to sharing information on this issue in the future with West Berkshire Council, as appropriate.</p> <p>Please note the 'Bracknell Forest Comprehensive Local Plan' (referred to in Appendix 1 of the SA) has now been renamed the 'Bracknell Forest Local Plan' (BFLP) and provides the long term spatial vision and development strategy for the Borough up to 2034. A consultation on the draft BFLP, including draft SA, draft HRA and draft Infrastructure Delivery Plan took place during February/March this year. It is hoped to arrange a Duty to Co-operate meeting with the relevant bodies to discuss issues raised, over the next couple of months.</p> <p>We welcome the opportunity for on-going discussion relating to the preparation of the above documents, and would be willing to attend meetings, workshops, respond to consultation material as appropriate, and ask to be kept informed of any future consultations.</p>
Forestry Commission, South East and London Area Office	<p><b>Local Plans and ancient woodland – Forestry Commission approach</b></p> <p>The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</p> <p><b>A summary of Government policy on ancient woodland</b></p> <p><a href="#">Natural Environment and Rural Communities Act 2006</a> (published October 2006).</p> <p><b>Section 40</b> – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p><a href="#">National Planning Policy Framework</a> (published March 2012).</p> <p><b>Paragraph 118</b> – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.</p> <p><a href="#">National Planning Practice Guidance</a> – Natural Environment Guidance. (Published March 2014)</p> <p>This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a <a href="#">non-statutory consultee</a> on “<i>development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in <a href="#">Natural England’s Ancient Woodland inventory</a>), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings</i>”</p> <p>It notes that <b>ancient woodland is an irreplaceable habitat</b>, and that, in planning decisions, <b>Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework</b>. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p><a href="#">Standing Advice for Ancient Woodland and Veteran Trees</a>. (Published April 2014)</p> <p>The Forestry Commission has prepared joint <a href="#">standing advice</a> with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to</p>

Respondent	Summary of Response
	<p>protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.</p> <p>The Standing Advice website will provide you with links to <a href="#">Natural England's Ancient Woodland Inventory assessment guides</a> and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. <b>Case Decisions</b> demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our <a href="#">website</a>.</p> <p><a href="#">The UK Forestry Standard</a> (3rd edition published November 2011).</p> <p><b>Page 24</b> "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs).</p> <p><a href="#">Keepers of Time</a> – A Statement of Policy for England's Ancient and Native Woodland (published June 2005).</p> <p><b>Page 10</b> "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".</p> <p><a href="#">Natural Environment White Paper "The Natural Choice"</a> (published June 2011)</p> <p><b>Paragraph 2.53</b> - This has a "renewed commitment to conserving and restoring ancient woodlands".</p> <p><b>Paragraph 2.56</b> – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".</p> <p><a href="#">Biodiversity 2020: a strategy for England's wildlife and ecosystem services</a> (published August 2011).</p> <p><b>Paragraph 2.16</b> - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).</p> <p>Renewable &amp; low carbon energy</p> <p>The resilience of existing and new woodland is a key theme of the Forestry Commission's work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.</p> <p>Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.</p> <p>Flood risk</p> <p>The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.</p> <p>The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.</p> <p>In the wider planning context the Forestry Commission encourages local authorities to consider <a href="#">the role of trees in delivering planning objectives</a> as part of a wider integrated landscape approach. For instance through:</p>



Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• the inclusion of <a href="#">green infrastructure</a> (including <a href="#">trees and woodland</a>) in and around new development; and</li> <li>• the use of locally sourced wood in construction and as a sustainable, <a href="#">carbon lean fuel</a>.</li> </ul>

9 November 2018

**Development and Planning**

Council Offices  
Market Street Newbury  
Berkshire RG14 5LD

**Our Ref:** Local Plan Review

**Please ask for:** Planning Policy Team  
**Direct Line:** 01635 519511  
**e-mail:** [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)

Dear

**West Berkshire Local Plan Review (LPR) to 2036  
Regulation 18 Consultation 9 November - 21 December 2018**

West Berkshire Council is reviewing its Local Plan to cover the period up to 2036. Between February and March 2018 we invited comments on the proposed scope and content of the Review as the first part of our consultation under Regulation 18 of the Town and Country Planning (Local Development)(England) Regulations 2012. The comments and suggestions we received are summarised in our [Consultation Statement](#) and will be taken forward in the development of the spatial strategy and both strategic and local policies as appropriate.

We are now progressing the LPR with a second round of Regulation 18 consultation which also takes into account revised national policy (as set out in the [National Planning Policy Framework](#) that was published in July 2018) and the revisions made to parts of the national [Planning Practice Guidance](#).

We are now seeking your comments on our proposed:

- vision for the LPR;
- revision of the existing spatial areas;
- methodology for reviewing the existing settlement hierarchy;
- criteria for the settlement boundary review; and
- update of our assessment of existing Local Plan policies.

This will be followed up with another consultation in the summer of 2019 with the publication of our assessments of sites that have been submitted to us as part of the Housing and Economic Land Availability Assessment (HELAA).

We would welcome your feedback on our proposals which are set out in our [Consultation Paper](#). Your comments should be submitted during the six week consultation period, running from Friday 9 November to 4:30pm on Friday 21 December 2018. They can be made:

**Online:** using the Council's [Local Plan Consultation Portal](#):  
This is the easiest and most efficient way to make your representations.

or by **Representation Form**: available electronically on the [Council's website](#) and through all libraries in the District and in hard copy at West Berkshire Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. Completed representation forms can be returned:

- by email [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk); or
- by post to the Planning Policy Team, Development and Planning, West Berkshire District Council, Market Street, Newbury. RG14 5LD

All comments must be received by **4:30pm on Friday 21 December 2018**. Please note that all comments will be made available to the public to view and therefore cannot be treated as confidential.

If you have any queries relating to this consultation, please do not hesitate to contact the Planning Policy Team at [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk) or 01635 519111.

Yours sincerely

Gary Lugg  
Head of Development and Planning

*You have been sent this letter because you are either a statutory consultee, have previously made representations on the West Berkshire Local Plan or have asked to be kept informed. If you no longer wish to be contacted please let us know.*

## West Berkshire Local Plan Review (LPR) to 2036

### Consultation Statement for

### Regulation 18 consultation (undertaken from 9 November - 21 December 2018)

June 2019

#### 1. Introduction

- 1.1 The Council is currently reviewing its Local Plan to cover the period to 2036. We are still in the early stages of this Review (LPR) which is known as the Regulation 18 stage.
- 1.2 Between February and March 2018 we invited comments on the proposed [scope and content of the Local Plan Review](#) (LPR) as the first part of our consultation under Regulation 18 of the Town and Country Planning (Local Development)(England) Regulations 2012. The [comments and suggestions](#) we received as part of that work continue to inform the development of the spatial strategy and both strategic and local policies as appropriate. They also gave us an important steer as to what our priorities should be.
- 1.3 As part of the development of the Review we undertook a [second round of Regulation 18 consultation](#) from 9 November to 21 December 2018. This took into account revised national policy (as set out in the [National Planning Policy Framework](#) that was published in July 2018<sup>1</sup>) and the revisions made to parts of the national [Planning Practice Guidance](#).
- 1.4 We sought comments on our proposed:
- vision for the LPR;
  - revision of the existing spatial areas;
  - methodology for reviewing the existing settlement hierarchy;
  - criteria for the settlement boundary review; and
  - update of our assessment of existing Local Plan policies.
- 1.5 This statement sets out a summary of the comments received to this consultation and the Council's response to them<sup>2</sup>.

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<sup>1</sup> In February 2019 the Government published another [revised version of the NPPF](#). This contains minor clarifications to the NPPF that was published in July 2018. None of these clarifications would materially alter any of the responses we received as part of Regulation 18 consultation.

<sup>2</sup> Please note that the Council is not commenting on the suitability or otherwise of any of the individual sites being promoted through the Housing and Economic Land Availability Assessment (HELAA) at this stage. The HELAA will be published later this year.

## 2. Regulation 18 Consultation

- 2.1 In all, there were 123 respondents to the consultation with some respondents commenting on all questions and others only commenting on those questions of specific interest to them. There were 438 comments made in total.

Question	Number of comments
Q1: Vision	81
Q2: Spatial areas	85
Q3: Settlement hierarchy	71
Q4: Settlement boundaries	70
Q5: Updated policies	61
Other comments	71
<b>TOTAL COMMENTS</b>	<b>438</b>

- 2.2 A summary of the respondents' comments to each question is provided below with the full responses available to view on our [Consultation Portal](#)
- 2.3 It is important to make clear that all comments made have been noted and will be given full consideration at the appropriate stage in the LPR.

## 3. Q1: Do you agree with our proposed Vision?

### Summary of comments received:

- 3.1 In general there was broad support for the Vision and its inclusion as a context for the Strategic Objectives was welcomed. Opportunities were highlighted where the Council could work with town and parish councils in order to deliver the LPR.
- 3.2 Our neighbouring authorities were broadly supportive of the Vision. Further expansion on what new housing would bring to the District was considered to be beneficial and consideration of the impact that new housing development in particular may have on the infrastructure of adjacent authorities. The Royal Borough of Windsor and Maidenhead was the exception, expressing concern that our approach would not be compliant with the NPPF because it may not meet the appropriate needs of all relevant households, particularly in relation to in migration, economic development and constrained housing and employment market areas elsewhere.
- 3.3 The importance of setting and considering the Vision in the context of the wider area both in terms of housing, employment and also infrastructure was highlighted by others, as was the consideration of other strategies. The objectives of the Thames Valley Berkshire Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP), for instance, highlights the critical importance

of addressing housing availability and affordability to support local economic growth.

- 3.4 Whilst supporting the Vision, some respondents felt it was too broad and generic and should be more specific to West Berkshire. Some particular suggestions included highlighting the AONB and the challenges facing young people in the rural villages to the west of the District.
- 3.5 A recognition of the rural nature of the District and the challenges that brings was felt to be important generally and that flexibility should be introduced into the Vision to allow for that.
- 3.6 Some of those in the development industry felt that the housing needs of the District were the major issue to be addressed through the Local Plan and that the need to accommodate these should be prioritised and set out at the beginning of the Vision rather than the current economic focus in the first paragraph. In addition, providing 'sufficient housing' was not considered to be an aspirational aim by one respondent.
- 3.7 The fact that the vision should be implemented flexibly, accepting that housing needs can be met from a variety of sources including both large and small sites, with every settlement within the hierarchy capable of making a meaningful contribution towards the District's overall housing needs was stressed by those in the development industry. The role of previously developed land was highlighted by some and a bolder vision with regard to these sites suggested. There were also a variety of promoters who put forward specific sites which they considered would help achieve the Vision.
- 3.8 More specific wording and clarifications on particular issues were requested, particularly from those relating to environmental issues. These included matters such as water quality and pollution. Whilst welcomed by some, the reference to 'outstanding' in relation to the District's landscape and historic assets was felt to be misleading and a more measured approach was considered to be more appropriate. Some disappointment was expressed at the omission of particular wording such as 'sustainable development' and 'landscape led'.
- 3.9 Whilst the encouragement given to economic development was welcomed, it was put forward that the current wording suggests a focus upon the establishment of new businesses within the area, rather than a recognition of the needs of existing businesses which it was argued should be allowed to grow and adapt to changing circumstances, in order to remain prosperous.
- 3.10 Although not directly consulted upon, the updated Strategic Objectives did generate some comment. The importance of them flowing from the Vision was stressed. Specific amendments to the wording of a few objectives were proposed.

### **Council response:**

- 3.11 The consultation responses indicated broad support for the inclusion of a Vision and this is welcomed. Providing an overall context for the Local Plan Review (LPR) strategic objectives, the development of a Vision had arisen as a result of the responses to the consultation on the LPR Scoping Report in February / March 2018.
- 3.12 It is acknowledged that the main concerns of consultees related to the actual detail of the Vision. The Council therefore intends to undertake further work to see if we can strike a balance between making it more West Berkshire specific, picking up some of the particular issues raised, whilst still retaining a strategic outlook.
- 3.13 Encouragingly, there were plenty of opportunities highlighted where the Council will be able work with town and parish councils to deliver the LPR and these will be actively pursued.
- 3.14 More specific wording on particular issues was requested and some tightening up of the draft text, which is helpful. We intend to look at these in detail and amend the draft text as appropriate.
- 3.15 We will also look at the relationship of the Vision to the Strategic Objectives to ensure it is clear. In addition, although not directly consulted upon, the updated Strategic Objectives generated some useful comment and so will be considered again in this context.

### **4. Q2: Do you agree with our proposed revision of the existing spatial areas?**

#### **Summary of comments received:**

- 4.1 Although about a quarter of respondents did not express an opinion either for or against our proposed revision of the spatial areas, of those that did, comments were divided. Whilst most comments were accepting of the AONB and Newbury/and Thatcham spatial areas, most of the responses that were against any revision related to the proposed change to combine the existing Eastern Urban Area and Theale with the East Kennet Valley. Local communities and site promoters who felt that would be directly affected by such a change were particularly concerned. AWE also continued to express concern about potential development at Grazeley.
- 4.2 It was noted by a few respondents that other than their geographical locations adjacent to each other, there was little synergy between the current Eastern Area and the East Kennet Valley. The Eastern Area is very urban in nature with much, but not all, of the undeveloped land forming part of the North Wessex Downs AONB. It has a strong functional relationship with the rest of Reading. By contrast, the East Kennet Valley is characterised by a number of smaller villages located along transport routes and in the wider countryside.

Many of these areas have a stronger relationship with Newbury and Thatcham.

- 4.3 The parish councils in the Kennet Valley were concerned that the East Kennet Valley would become, in effect, a suburb of Reading. They felt each area and community required different approaches to both development and infrastructure delivery. Despite this, one respondent from the development industry felt that combining the two areas would have actually no practical effect on the constraints to development. Whilst the Eastern Area was constrained by the AONB, there still remained opportunities for sustainable development on the edge of the existing settlements. It was noted that the constraints associated with AWE remained, whether the East Kennet Valley was combined with the Eastern Area or remained separate. It was felt that the creation of a new Eastern Spatial Area would provide greater justification for the consideration of a large-scale strategic development at Grazeley. Considered as part of a wider Eastern Area, the new housing could contribute towards housing need within the current Eastern Area and within the Greater Reading Area Urban Area to which it would be well related. It was stressed though that whilst this might be a sustainable option for growth within West Berkshire District, it should not be pursued at the cost of further small-scale development within the Calcot/ Tilehurst/Purley area.
- 4.4 There was more support for the proposed revision from other respondents not directly affected. Cold Ash Parish Council and Thatcham Town Council questioned whether the more rural areas surrounding the larger towns should be included in the Newbury and Thatcham area as this could lead them being treated more in an urban than a rural context. A suggestion was made that Cold Ash should be included in the AONB spatial area instead. Thatcham Town Council also thought the Newbury and Thatcham spatial area should include the land at Lower Way Farm.
- 4.5 General support was expressed for the identification of the AONB spatial area although concern was raised that the area still needs to thrive and that the vitality of rural settlements across the District should be supported, regardless of whether there was any large scale development at Grazeley. The importance of the spatial strategy containing enough flexibility to enable small to medium sites to be allocated and delivered in the short-term was stressed. It was felt that policies relating to this spatial area should recognise the diversity in the character and form of settlements and modest growth that would support existing settlements such as at Hungerford be encouraged. Streatley was used as a particular example where development has not occurred despite its proximity to Goring which is classed as a larger village in the South Oxfordshire hierarchy.
- 4.6 There were also some respondents, particularly from the development industry, who thought that the division of the District into spatial areas was both complicated and unnecessary and that simply having a clear settlement hierarchy applied across the District was sufficient. Concern was expressed that the Council would arbitrarily set targets for the various spatial areas with no evidence to support the intended split between them. They stressed that the benefit of using a spatial hierarchy approach only was that there would

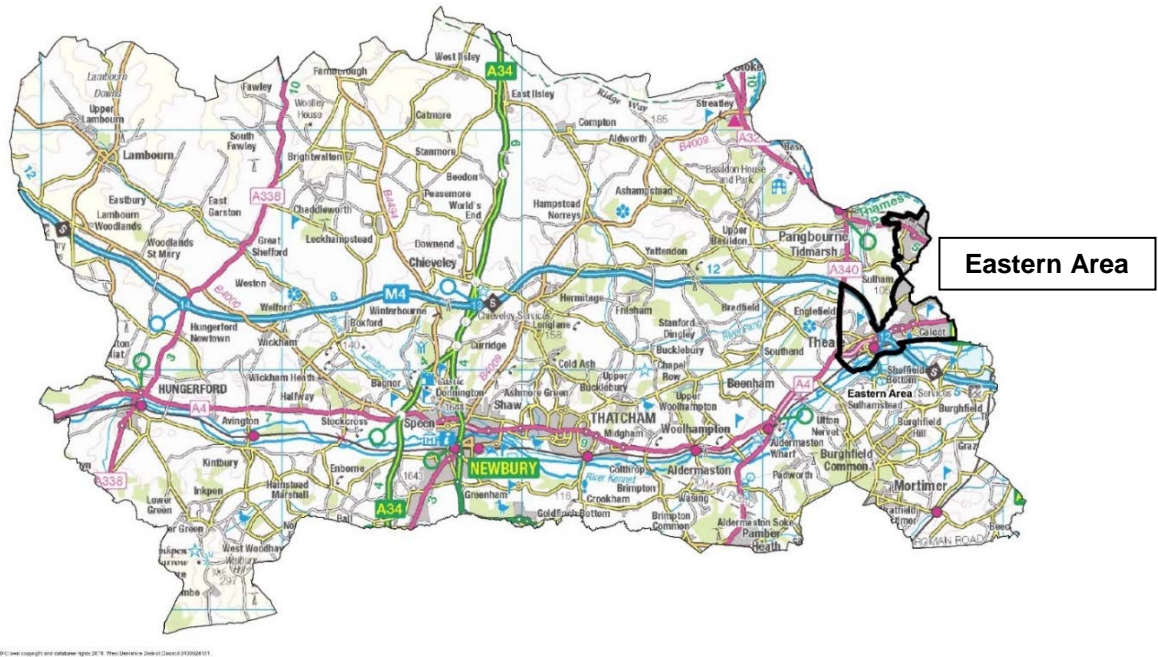


then be clarity where unmet needs could not be met within a given tier as they would be distributed to another tier in the hierarchy starting from the top-down. Unmet needs from any given tier could be met in the most sustainable locations first. It was noted that this approach was relatively standard across the country, including those authorities which include large areas of Green Belt and AONB. The respondent felt there could then be no claim that needs could not be met unless it could be categorically shown that no acceptable sites existed within sustainable settlements.

### **Council response:**

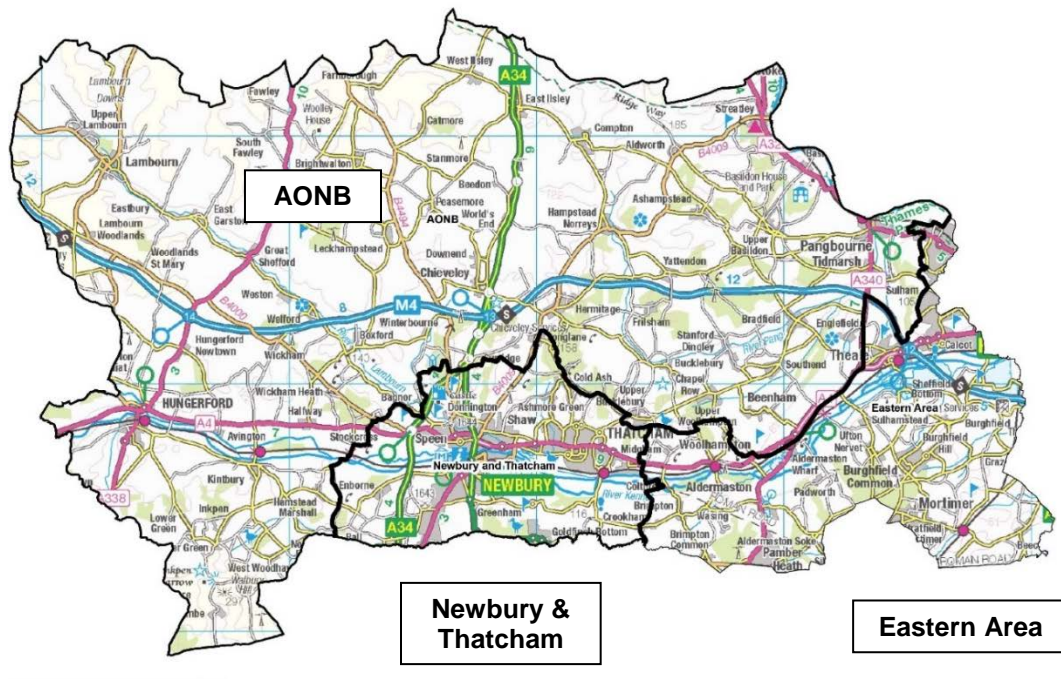
- 4.7 It is fair to say that the proposed amalgamation of the Eastern Area with the East Kennet Valley created most discussion. The disparities between the two areas were highlighted and genuine concern was raised that the individual identities of each would be lost if they were combined.
- 4.8 In taking these issues forward it is important to make clear that the conservation and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside is key to our spatial approach and remains one of the strategic objectives of the LPR.
- 4.9 What is also important to recognise is that there are significant differences in character within all of the spatial areas – whether existing or proposed. The Newbury and Thatcham spatial area, for instance, contains a significant rural hinterland which includes villages such as Cold Ash and Enborne and which visibly contrasts in character with the more urban areas of Newbury and Thatcham. Similarly, in the existing Eastern Area the rural hinterland to the north of Theale contrasts greatly with the urban areas of Calcot and Tilehurst. It is clear that we will need to ensure that differences in character are drawn out clearly in any descriptive text for each of the spatial areas.
- 4.10 Functional relationships were also cited as a reason to not combine the Eastern Area with the East Kennet Valley with respondents arguing that the Eastern Area looks towards Reading and the East Kennet Valley towards Newbury and Thatcham. In reality the situation is much more complex. Neither area can be seen in isolation and both clearly interact with each other and with the AONB and Newbury Thatcham spatial areas too. The rural service centre of Theale currently sits on the edge of the Eastern Area but it could easily be argued that it has more in common with the East Kennet Valley. Combining the two spatial areas would therefore assist when considering the role and function of Theale in the wider context.
- 4.11 In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation (see figure 1 below). In 2010, when the Core Strategy was being prepared, the Eastern Area was originally a broad area for development that included Pangbourne and a small area of the AONB running along the edge of the main urban area. However, through the Core Strategy examination process this area was reduced to exclude all parts of the AONB and so ultimately, the adopted Eastern Area is smaller than originally envisaged. This has since created challenges in delivery.

**Figure 1: Existing Eastern Area spatial area**



4.12 In reality, combining the two existing spatial areas as proposed (see figure 2 below), will simply be more practical and give the Council more flexibility in strategic planning terms. It also needs to be considered in the context of national guidance. The National Planning Policy Framework (NPPF) makes clear that in order to be considered sound, plans and policies have to be both flexible and deliverable.

**Figure 2: Proposed Spatial Areas**



- 4.13 For the reasons outlined above, the Council will therefore amalgamate the existing Eastern Area with the existing East Kennet Valley as originally proposed.

**5. Q3: Do you agree with the methodology we propose to use for reviewing the existing settlement hierarchy?**

**Summary of comments received:**

- 5.1 The overall approach of having a settlement hierarchy was generally endorsed. The two stage quantitative and qualitative process was also supported. Various respondents, particularly from the development industry used the opportunity to put forward arguments as to where, why and how, particular settlements should be considered within the hierarchy.
- 5.2 It was considered important that the proposed methodology should identify the most sustainable settlements to accommodate future development. A few respondents considered the review should be of all settlements, whether they had defined boundaries or not. Some also felt there was a need to distinguish between those within and outside the AONB.
- 5.3 There was concern expressed from a few in the development industry that our approach would not take into account the potential for settlements to be sustained by, and acquire improved facilities or services as a result of sustainable development taking place or proposed to take place.
- 5.4 There were some suggestions relating to the various categories of settlements. One respondent thought that rural service centres should be divided into two groups in relation to their access to a railway station. Another noted that while there are currently two additional types of area where there will be more limited development (smaller villages with settlement boundaries and open countryside), consideration should be given to a third category between the two, to recognise settlements or parts of settlements that have a looser pattern of development (but not so loose to be reasonably described as 'isolated') but nevertheless relate to a settlement with a boundary. Given the diverse nature of the settlements across the North Wessex AONB spatial area, it was felt that there were many groups of dwellings that would fit into this category
- 5.5 There were a variety of comments and concerns expressed in relation to the scoring of facilities and services. There was criticism from some that no explanation had been provided to how the points were allocated to each of the criteria.
- 5.6 One respondent commented that the audit of services and facilities speaks to the performance of the settlement in terms of accessibility (to services, facilities and employment) rather than sustainability and so the text should be amended to reflect that.

- 5.7 Clarification was sought on a number of issues and it was felt that further justification may be required to determine the points system with regard to certain facilities and services. In some circumstances it was argued it was unclear why a particular service secured a higher score than another. For instance, it was felt it was unclear why a village hall / community hall should score higher than a permanent library. Both offer community facilities and were often a source of local information.
- 5.8 A few respondents thought it was important that the points awarded should be weighted to take account of partial provision, for instance, the part time provision of Post Office facilities through the existence of outreach services or the provision of a mobile library. In addition, clarification on whether services and facilities had to be a unique facility or whether they could be combined with one another, such as a community hall, were also sought.
- 5.9 The scoring given to public transport was raised by quite a few respondents. Some felt that that further weighting should be given to accessibility by public transport and that there should be a distinction between bus and rail services. It was thought that the presence of a railway station had been underplayed and that it was not clear why accessibility to a railway station scored the same as accessibility to a bus service to a larger centre. It was argued that a rail service provided a greater level of accessibility to higher order settlements where people could have access to a greater range of services and facilities. The frequency of services was also considered important.
- 5.10 Questions were also raised with regard to the scoring for schools. It was highlighted that many of the significant villages in the District have a primary school but few have a secondary school. It was argued that given the amount of travel associated with secondary school education and the facilities and services that these establishments offered, additional weighting would be justified.
- 5.11 The consideration of a settlement's wider access to services and facilities within its vicinity and locality was acknowledged by some but it was considered important that an explanation of how the 1km was defined (whether from the centre of a settlement or its boundary) was justified within the methodology. A point made by a few respondents was that it should be acknowledged that services and facilities may be located in an adjoining authority, or outside of a settlement. In addition, a clearer definition of what is meant by access 'to business employment opportunities of an *appropriate size* within the settlement or within 2km of the centre of the settlement' was considered essential.
- 5.12 It was argued that some of the criteria were not necessary: a dental surgery was not regarded as a day to day requirement and so both its inclusion and score of three points were questioned. Similarly, whilst a health centre may be a more frequent requirement for some, it was argued it was not reasonable to expect one to be located in each settlement due to the changes in the way healthcare services are now delivered. Additionally, the presence of a bank/building society was not felt to be an indicator of sustainability any more, given the rise of internet banking.

- 5.13 There were a number of suggestions proposed for addition criterion:
- availability of broadband
  - car parking provision
  - the level of community involvement
  - sheltered accommodation
  - restaurants and takeaways
  - supermarket
  - existing development commitments, both permitted and planned
  - number of dwellings
  - population
  - properties / floorspace liable for business rates
- 5.14 It was also felt that the distance from urban centres (both within and outside the District) should be included because the sustainability of settlements in locational terms is relative, not only to the services/facilities within the settlement itself, but also in relation to services/facilities in other settlements.
- 5.15 The statistical scoring exercise was noted as being a starting point and the qualitative assessment was generally welcomed. There was clear support for any decisions made through it to be transparent and informed by evidence. A respondent from the development industry was particularly keen that the Council showed flexibility even with the hierarchy in place.
- 5.16 There were various suggestions put forward as to what the qualitative assessment should include, such as consideration of the availability of potential development sites and long-term land holders that might act as development partners, the presence of significant redundant or brownfield sites and the proximity to employment opportunities or good accessibility links. It was also argued that there should be consideration given to the future potential of each settlement to support sustainable growth.
- 5.17 Furthermore, concern was expressed that there were no details as to what the scoring thresholds would be for classifying different settlements. It was felt that this should be clearly set out in the final methodology before the assessment starts so that the process is completely transparent.
- 5.18 Finally, there was a strong support for further consultation on the settlement hierarchy and the evidence/analysis that supports it as the Local Plan Review progresses particularly with parish councils.

**Council response:**

- 5.19 The settlement hierarchy plays an important role in identifying sustainable locations for development. It categorises the District’s settlements according to their different roles and groups them accordingly. The general endorsement given to the principle of our approach, particularly the two stage quantitative and qualitative process, is therefore welcomed.
- 5.20 We acknowledge that the provision of services and facilities within settlements can change over time and so that is why we are updating our existing assessment of settlements as we plan for the period to 2036. By assessing existing settlements at this early stage of the LPR we can ensure the spatial strategy is based on an accurate and up to date reflection of the role of settlements within the District.
- 5.21 It is acknowledged that the main concerns of consultees relate to the actual detail of the methodology, particularly the clarity surrounding the points given to specific services or facilities. We therefore intend to undertake further work on the points system in light of the comments made. This will include:
- whether additional weighting should be given to the part time provision of services; the sharing of services; accessibility by public transport; the distinction between rail and bus services and; the provision of a secondary school.
  - Consideration of whether some criterion should be removed e.g. dental surgery or bank/building society
  - Consideration of the additional criterion proposed
  - Scoring thresholds
  - Clarification of some of the definitions used
- 5.22 We recognise that further work will need to be undertaken to assess whether the existing categories within the hierarchy continue to remain the most appropriate going forward to 2036. To some extent this will depend on the outcome of both the audit of existing services and facilities and the qualitative assessment.
- 5.23 The responses clearly showed that involvement in the evolution of the settlement hierarchy is important for many stakeholders and this is welcomed. The importance of a sound evidence base will be key to its success and so the interest expressed from parish councils is particularly encouraging. We will be contacting each of them as part of the quantitative assessment to clarify the level of services and facilities within each settlement as appropriate.

**6. Q4: Do you agree with the criteria we have set out for reviewing the settlement boundaries?**

**Summary of comments received:**

- 6.1 The majority of respondents agreed with the principle of the Council’s landscape led approach to the drawing of settlement boundaries. One favoured a community led approach instead. Another respondent considered that using physical boundaries was not necessarily a useful way of defining landscape impact and another was unclear how this would work in practice. A few respondents from the development industry disagreed with the principle of boundaries altogether, feeling that they didn’t accord with the principles of the NPPF and by creating a binary approach, did not allow enough flexibility to allow for appropriate development to come forward. Another thought that it should include greater consideration of the economic and social benefits resulting from development, particularly in the AONB.
- 6.2 The use of the existing evidence base was welcomed although one respondent questioned the up to datedness of some of the studies quoted. The use of Historic Landscape Characterisation in particular was welcomed by some. Historic England noted that the specific issues to be considered on a site by site basis should include the potential impact on the significance of designated and non-designated heritage assets, which may require a specific Heritage Impact Assessment. Parish plans were also mentioned as being useful evidence. The Environment Agency also made clear that if any settlement boundary were close to a main river corridor then it would expect to see an ecological buffer zone between the edge of the settlement and the top of the riverbank.
- 6.3 Whilst the use of the higher level studies was supported, one parish council suggested that the relative weighting between the landscape studies and the physical attributes could usefully be clarified. Another respondent also argued for further clarification as to their relationship and thought this would be an important issue particularly when considering settlements within or closely related to the AONB.
- 6.4 Clarity regarding the inclusion of sites allocated through the local plan process was sought. It was also assumed the review of settlement boundaries would be undertaken after the assessment of potential site allocations had been completed. The issue of whether to include the whole of the allocated sites within the boundary or whether to just include the developable area was also raised. It was considered essential that the review of settlement boundaries takes account of all development which has taken place since the boundaries were first drawn up or last reviewed and that this included sites with extant planning permission. There were a number of respondents from the development industry who made specific comments in relation to individual sites that are being promoted for development and felt should be included within any settlement boundary review. It was argued that the policy approach should allow for development proposals ‘within or adjacent to a settlement boundary’.

- 6.5 One respondent commented that revisions to the settlement boundaries should be informed by the updated LHN figure. It was also argued that settlement boundaries should be flexible and be drawn to allow windfall development if the Council was going to rely on them for five-year land supply calculations and housing trajectories. There was a suggestion that settlements in the AONB should be treated differently to those outside.
- 6.6 Although some examples of what the Council means by '*clearly defined physical features*' were given, one respondent felt the process would be more transparent if a more comprehensive list were provided and that this should consider the permanence of features. A feature that is more likely to remain static over time, such as an adopted road, would act as a robust boundary whereas boundary features such as hedges could easily be removed and prone to change over time.
- 6.7 The proposal to include '*individual plots or other similar scale development opportunities*' caused some discussion. A few thought they shouldn't be included as it wouldn't be plan led, whereas others, particularly from the development industry, welcomed the flexibility they would bring to the long term sustainability of settlement, particularly in rural areas. Some argued that the reference was unclear as to what size of plot was being referred to, whereas others thought it was unnecessarily restrictive and where a plot could accommodate several houses, it should be assessed on its own merits.
- 6.8 It was argued that there was a tension between allowing for '*individual plots or other similar scale development opportunities*' and the exclusion of '*open undeveloped parcels of land on the edges of settlements*'. It was suggested that the wording should be revised to include '*small sites where development would form a logical complement to the existing pattern of development and sites allocated through the local plan process.*'
- 6.9 Some respondents argued that some of the criteria proposed for excluding land from the settlement boundary were overly restrictive and unclear. These should instead be lists of features and characteristics that would be taken into consideration, with greater emphasis being given to specific issues to be considered on a site by site basis.
- 6.10 The proposal to exclude some existing developed areas, including loose knit buildings, farm buildings and farmyards, horse related development and public utilities (sewage treatment plants, substations) from settlement boundaries where they are located on the edge of a settlement caused concern from some in the development industry. It was argued that such sites are likely previously developed in nature and could, if surplus to operational developments in the future, provide obvious development sites well related to their communities. It was asserted that such sites should be assessed on a case by case basis but should be considered for inclusion within the settlement boundary as a default position.



**Council response:**

- 6.11 The overwhelming support given to the principle of the Council's landscape led approach to the drawing of settlement boundaries is welcomed.
- 6.12 We are currently updating some of the evidence base with a Landscape Character Assessment for West Berkshire due to be completed later this year and this will help in providing a context for the review of settlement boundaries.
- 6.13 It is appreciated that whilst the principle of the approach was supported, clarity was sought in some of the detail. We therefore intend to undertake further work on the practical application of dealing with the inclusion of individual plots or other similar scale development opportunities. Other issues will be considered and incorporated as appropriate as the review progresses.

**7. Q5: Do you agree with our updated assessment of policies?**

**Summary of comments received:**

- 7.1 Although this consultation related to our 'updated' assessment of policies, some comments made previously in our Feb - March 2018 were reiterated and reinforced using the revisions made to the NPPF. At the same time, others felt there was not enough information to be able to make an assessment or that the information was not presented clearly enough to comment.
- 7.2 In general, the ability of the policies to incorporate flexibility was stressed, particularly from those in the development industry. Considering the 'bigger picture' with the ability to accommodate various scenarios was important. There were offers of help to work together from a number of respondents on either individual policies, those relating to specific spatial areas and also relevant supporting documents and guidance. Clarifications were also sought on specific policies, with the importance of the linkages between the policies and the Vision stressed.
- 7.3 A number of comments were made relating to the economy. Some respondents stated that the role of the and function of the Protected Employment Areas (PEA) should be reviewed in light of the evidence produced from the Functional Economic Market Area Assessment (FEMA) and the Economic Development Needs Assessment (2016). It was also argued that many sites within the PEAs are currently underutilised and could be more sustainable if redeveloped for mixed use schemes. It was also noted that Green Park should be recognised as a key employment location and as such would need to continue to be supported by the enhancement of transport and infrastructure.
- 7.4 Both Newbury and Thatcham town councils advocated specific policies relating to their areas. A new business park, designed especially for new and

innovative businesses at A34/ M4 Junction 13 and the creation of a “Business Enterprise Zone” to complement the existing area at Colthrop, respectively.

- 7.5 Policies regarding the delivery of homes generated much discussion, particularly within the development industry. The ability of the LPR to consider and accommodate the needs of the wider housing market area within appropriate locations was stressed. The consideration of sites adjacent to settlement boundaries was again reinforced. At the same time it was also argued that policy should be seen in the context of relevant policies in the NPPF that protect areas and assets of particular importance. It was stressed that it was important that the LPR considers all options regarding existing housing site allocations and that it would need to have regard to whether they continue to remain deliverable and / or developable when assessed against up-to-date evidence.
- 7.6 The policy stance to support the delivery of affordable housing needs to be strengthened it was argued, to reflect the fact that this is one of WBC’s strategic priorities and to address housing need in general. One respondent strongly urged the Council to adopt the definitions of affordable housing in the revised NPPF, including starter homes and discounted market sales housing. It was also claimed that in order to reduce negotiations on viability, the Council may need to reduce its overall affordable housing requirement, prepare a more area based policy or reduce the costs arising from other policies.
- 7.7 Some respondents stressed that whilst the Council needs to consider the broad mix of homes that are required across the area (particularly with regard to an aging population) it was important that flexibility was retained with regard to the type of homes delivered on each site. Having a requirement to provide a fixed mix of housing types within a specific policy was questioned. It was also argued that the LPR should incorporate sufficient flexibility for the mix of dwellings sizes to be reflective of the surrounding environment and development pattern.
- 7.8 It was asserted that retail policies should be reviewed in light of the current challenges facing the high street. Future planning policy should allow for the development of a suitable mix of main town centre uses with higher density residential development within the town centre. The defined boundary of Newbury town centre in particular should continue to be afforded protection to ensure that out of town retailing does not harm or jeopardise investment within the town.
- 7.9 The Environment Agency provided some detailed comments and specific policy wording with regards to our approach to flood risk, specifically the sequential test, sequential approach and exception test, together with pollution prevention and water quality measures. It also noted that the LPR should include a specific water resources policy, together with another on watercourses. Thames Water also made detailed comments regarding water and wastewater infrastructure.

- 7.10 A comprehensive district-wide green infrastructure (GI) strategy was advocated in order to enable the most appropriate and efficient delivery of GI with new allocated development, and GI provision which best meets the needs of the District and the strategic objectives of the LPR. The overlap between this and a widening out of a policy on the Kennet and Avon Canal was also noted.
- 7.11 Whilst the inclusion of a specific policy covering cultural facilities was supported, it was also noted that this could also be achieved by way of a strategic policy promoting cultural facilities more generally under the umbrella of community facilities, the promotion of new cultural uses within town centre policy and ensuring robust protection of such facilities through an enhanced community, cultural and social facility policy.
- 7.12 One respondent argued the continued importance of maintaining separate policy provisions within the LPR for schools, colleges and residential institutions which lie partially or entirely within the open countryside.
- 7.13 Lastly, there was also support for the provision of specific policy protecting public houses, with the recommendation that the existing Supplementary Planning Guidance (SPG) is brought into Local Plan policy to give it greater weight.

### **Council response**

- 7.14 Although this consultation related to our ‘updated’ assessment of policies it is acknowledged that some comments made previously in our Feb - March 2018 consultation were reiterated and reinforced using the revisions made to the NPPF.
- 7.15 We agree that the ability of the policies to incorporate flexibility will be important. There were offers of help to work together from a number of respondents on either individual policies, those relating to specific spatial areas and also relevant supporting documents and guidance which are welcomed. The additional technical information and guidance submitted will be particularly useful as the policies are reviewed further.
- 7.16 It is clear that as part of our assessment of policies some of the key tasks over the next few months will be:
- the inclusion of a strategic policy on climate change
  - the consideration of the revised affordable housing definitions and further consideration to different types of rural exception sites
  - further work on housing types and mixes, including appropriate pattern book densities and specialist housing such as older persons accommodation, custom and self-build and houseboats
  - to have regard to the existing housing site allocations and be further informed by our work on the Housing and Economic Land Availability

Assessment (HELAA) to help assess whether they continue to remain deliverable

- a review of the Protected Employment Areas (PEAs)
- a review of retail issues, including the hierarchy of centres and our approach to retail frontages
- consideration given to additional policies on water resources, pollution prevention and water quality
- consideration of our overall approach to the Kennet and Avon Canal and wider cultural and tourism issues

## **8. Other comments**

### **Summary of comments received:**

- 8.1 There were extensive comments made in response to the consultation generally, primarily relating to the Council's review of the housing requirement and the housing land supply. Some previously made comments in the Feb-March 2018 consultation were also updated in light of the revised NPPF.
- 8.2 The representations highlighted the continued importance of working strategically with our neighbouring authorities, specifically with regard to the provision of housing and in particular affordable housing and accommodation for Gypsies and Travellers and Travelling Showpeople, the strategic road network, the potential strategic development at Grazeley and the Thames Basin Heaths Special Protection Area (SPA). Statutory consultees also took the opportunity to reinforce the importance of identifying and mitigating any potential impacts on the strategic road network, rail infrastructure and the historic environment.
- 8.3 The length of the plan period was raised again. The Review will need to plan for at least 15 years from its adoption and is intended to cover the period to 2036. One respondent felt that consideration should be should be given to adopting a plan with a later end date in case the adoption date slipped. Another respondent questioned the timescale for the LPR, thinking it unlikely the Council would meet the timetable as set out in the current LDS.
- 8.4 There were a number of comments advocating both for and against the continued exploration of potential development at Grazeley. AWE in particular reiterated its previously expressed concern about major housing development close to AWE Burghfield. It was felt by some that the scale of development proposed at Grazeley would mean it was unlikely to come forward until 2036 and so to include a specific allocation within the Plan would conflict with the NPPF and make the LPR unsound.
- 8.5 Some in the development industry again took the opportunity to highlight the need for clarification around the approach the Council will take to housing in

rural areas, particularly the need to achieve a good mix of smaller sites and the need to identify opportunities for villages to grow and thrive.

- 8.6 Several respondents thought that insufficient attention had been paid to the economic needs of the area and stressed the importance of reflecting the wider strategies, investment priorities and infrastructure funding requirements of the Local Economic Partnership. It was argued there was also a requirement for the LPR to take account of any needs that may arise over the plan period from ‘predictable and known events’ such as the London overspill, planned infrastructure provision (e.g. Crossrail) and the expansion of Heathrow. It was agreed that it was crucial the employment land requirement was reviewed to look longer term and important it was translated into an appropriate ‘requirement’, with the figure adjusted on a policy basis (including allowing for a greater margin of choice/flexibility to the land demand forecast calculation, to ensure a reasonable choice of sites for businesses and developers and/or to allow for delays in sites coming forward or premises being developed) to determine the actual employment target for the District. It was also considered important to have an understanding as to how people would be working in the future. It was argued that the historic reliance upon “B-uses” may not be a sound approach for understanding future employment needs, where there may be a greater reliance upon technology, employment hubs, working from home and potentially less, or indeed different forms of space.
- 8.7 The focus of many comments was on the review of the housing requirement and the housing land supply. Those within the development industry stressed the importance of the Local Housing Needs (LHN) being seen as simply a minimum starting point and put forward arguments for the final housing requirement to be much higher. It was argued that it was evident that the Council’s housing requirement would be in excess of its need’s assessment given the unmet needs arising from Reading. It would also be important for the Council to consider how best to deliver the affordable housing need of the District on the basis of a realistic assessment of the viability of development within the area.
- 8.8 Having the housing requirement as a range was considered to be a pragmatic approach, but many felt that West Berkshire should be planning to meet the higher end of this range. Opinion was divided as to whether the AONB should be treated differently and whether or not it should be seen as a constraint. It was considered important that the requirement was underpinned by the Housing and Economic Land Availability Assessment (HELAA). A large number of respondents from the development industry took the opportunity to either submit new or resubmit existing sites under the HELAA.
- 8.9 The need to plan for a consistent delivery of homes across the plan period was emphasised, but the stepped trajectory proposed by the Council generated much discussion. There was a general feeling from those in the development industry that was no justification for this approach. It was argued that this would result in an insufficient supply of housing being planned for across the early part of the plan period and that such an approach could cause both affordability and supply issues generally. It was stated that the

LPR should not be over-reliant on housing delivery at fewer strategic development which take longer to come forward, but should incorporate a supply of small and medium-sites, as encouraged by the NPPF.

- 8.10 The housing land supply generated some comments. Some respondents in the development industry considered that the windfall allowance was too high. Others commented that any windfall allowance within the Council's trajectory would need to be fully justified through compelling evidence that demonstrated such sites would provide a reliable source of supply.
- 8.11 One respondent thought that we should include and allocate sites inside settlement boundaries rather than treat them as windfalls, particularly as many of those sites would be brownfield and specifically identified as priority for re-development within the NPPF.
- 8.12 There were some new sites submitted under the Housing and Economic Land Availability Assessment (HELAA) and others which were revised after having previously been submitted.

**Council response:**

- 8.13 The continued importance of working strategically with our neighbouring authorities is acknowledged and agreed. We are currently working with the other authorities in the Western Berkshire Housing Market Area in drafting a Statement of Common Ground which will cover these issues. As far as the timetable for the LPR is concerned, we are currently reviewing the Local Development Scheme (LDS).
- 8.14 The extensive comments primarily relating to the Council's review of the housing requirement and the housing land supply have been noted. The housing requirement and housing supply position will be reviewed during the course of preparation of the LPR, taking account of the latest evidence. The position at the time of consultation on the proposed submission plan will be set out in a supporting technical document. This will bring the evidence on housing need and housing land supply up to date and include an explanation of the proposed housing requirement and any allowances made in the supply for windfall development and for flexibility. It is encouraging to note that having the housing requirement as a range is considered to be a pragmatic approach, especially as the Local Housing Need (LHN) is variable up until the LPR is submitted to the Secretary of State for examination as the inputs are constantly changing. The concerns relating to any development proposed at Grazeley are again noted. The masterplanning work that has been undertaken will provide a detailed assessment of its potential that will be taken into consideration when sites are considered for development as part of the LPR.
- 8.15 The sites submitted under the Housing and Economic Land Availability Assessment (HELAA) and those sites which were revised after having previously been submitted will all be assessed. It is important to note that not all sites that are being promoted and which have been submitted as part of the HELAA will be appropriate for development. The HELAA will make a

preliminary assessment of the suitability and potential of those sites for new homes, employment and other land uses and will provide evidence of both strategic and non-strategic growth opportunities across the District. The Council is therefore not commenting on the suitability of the individual sites being promoted through the HELAA in its response to this Regulation 18 consultation in advance of the publication of the HELAA later in the year.

- 8.16 The HELAA is not a policy making document and so does not make recommendations on which sites should be developed, but the information we gather from the HELAA will inform how and where we allocate sites through the LPR to cover the period up to 2036.

## **9. Next steps**

- 9.1 Following an analysis of the responses received we will:

- Finalise our Vision and Strategic Objectives
- Finalise the methodology for the settlement hierarchy and in co-operation with town and parish councils, start work on the audit of facilities and services
- Finalise the settlement boundary review criteria and in co-operation with town and parish councils, start work on the review of boundaries
- Start to undertake a detailed review of policies in co-operation with relevant stakeholders
- Publish a list of all sites that have been submitted to us for consideration under the HELAA
- Continue to update the evidence base to inform the LPR

**From:** [PlanningPolicy](#)  
**To:** [PlanningPolicy](#)  
**Subject:** Parish Stakeholder Events  
**Date:** 18 February 2020 12:47:03  
**Attachments:** [Presentations - Feb 2020 Consultation Workshops.pdf](#)

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Dear all,

Thank you to everyone who was able to attend the recent stakeholder events. For anyone who was unable to attend, we will shortly be circulating electronically to all Parish/Town Councils, neighbourhood planning groups and Ward Members the information that was handed out at the events. The presentation from the events is attached to this email. The information relating to the Housing and Economic Land Availability Assessment (HELAA), settlement hierarchy review and settlement boundary review will be sent in separate emails with the relevant information for each area.

From the District Council's perspective, the events were very helpful. We hope you found the events useful too. Some of you provided us with information and we have kept this. Most of you will need more time to consider your responses and we hope to hear from you soon. We have asked that information be returned to us if at all possible by **Friday 27 March 2020**. Please respond to the area specific emails you will be sent shortly if you wish to discuss.

We also hope that you found the question and answer sessions of use and that officers were able to provide helpful answers. In the coming months we will be busy undertaking much of the work required to get us to the point where we can consult on a 'draft plan'. Please do keep an eye on the ['Planning Policy News'](#) page our website where we will be publishing updates as we go. Many thanks,

**Planning Policy Team Leader**  
West Berkshire Council

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**From:** Planning Policy Team Leader  
**Sent:** 15 January 2020 15:39  
**To:** PlanningPolicy

**Subject:** Parish Stakeholder Event in the Council Chamber, Market Street Offices, Newbury - 12 February at 10.00

Dear parish/town councils and neighbourhood development plan groups,

As you will know, West Berkshire District Council is reviewing its Local Plan to cover the period up to 2036. Over the past 2 years, we have invited comments firstly on the proposed scope and content of the Review as the first part of our consultation under Regulation 18 of the Town and Country Planning (Local Development)(England) Regulations 2012.



A second round of Regulation 18 consultation sought comments amongst others, on the methodology for reviewing the existing settlement hierarchy set out in our Core Strategy 2006-2026 and the revised criteria for the settlement boundary review as currently set out in our Housing Site Allocations Development Plan Document (2006 – 2026). We have considered all the comments on both and made revisions.

Also, over that period we have been completing the Housing and Economic Land Availability Assessment (HELAA) of all the sites that have been submitted to us for potential development by landowners and promoters. We intend to publish the HELAA at the end of January and, when published, you will be able to view the document on our website.

To help guide us in the next stage of the Local Plan Review we would particularly value having the benefit of your local knowledge and insight of these issues and so in February, we will be holding a series of parish and town council workshops to discuss them in more detail.

For the purposes of the workshops only, we have divided the district into three areas. We hope this will give you more of an opportunity to express your views. Your particular workshop is being held on

**Wednesday 12 February at 10.00 in the Council Chamber, Market Street Office, Newbury** and we would welcome the attendance of up to two representatives from your organisation. The workshop will be no longer than two and a half hours and will cover:

- The confirmation of local facilities and services in your area and how these can help further guide the development of our settlement hierarchy;
- Our criteria for reviewing settlement boundaries and how we take this work forward; and
- the sites promoted to us in the HELAA.

Tea, coffee and refreshments will be provided.

Please respond to this email by **Friday 31 January**, indicating whether or not your organisation can attend. Please also provide the name(s) and direct contact details, including e-mail address, of who will be attending.

Many thanks,

**Planning Policy Team Leader**

10 December 2020

**Planning Policy**

West Berkshire Council  
Market Street, Newbury  
Berkshire, RG14 5LD

**Our Ref:** LPR/Reg 18

**Please ask for:** Planning Policy Team

**Direct dial:** 01635 519 111

**Fax:** 01635 519 408

**email:** [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)

Dear Sir/Madam,

**Regulation 18 Consultation on the Emerging Draft of the West Berkshire Local Plan Review (LPR) to 2037**

West Berkshire District Council is reviewing its Local Plan to cover the period up to 2037. The Local Plan Review (LPR) will identify the development that is required to meet our local needs, set out our strategy for distributing development within the district, as well as outlining our policies for conserving and enhancing the natural and built environment. It will help people in West Berkshire achieve sustainable development.

We are still at an early stage in the plan-making process and have produced an emerging draft version of the LPR. In preparing this we have taken account of previous Regulation 18 consultations which considered the scope and content of the LPR. We think it is important to understand what our stakeholders think at this stage and so we are taking this opportunity to ask you what you think of our current proposals. We want to give you a chance to influence the LPR before we have to formally consult on the draft Plan next year.

We would welcome your feedback on the emerging draft LPR. Your comments should be submitted during the eight week consultation period which runs from Friday 11 December 2020 to 4.30pm on Friday 5 February 2021.

Inspection of the document and how to comment

The consultation document can be viewed at:  
<https://info.westberks.gov.uk/localplanreview2036>.

Representations can be made in writing or by way of electronic communications:

**Online:** using the Council's Local Plan Consultation Portal which can be accessed at: <http://consult.westberks.gov.uk/kse>. **This is the easiest and most efficient way to both view the document and respond.** You will need to register, but then any comments you make will be stored in your account for future reference. Registration is possible using a Facebook or Twitter account.

**By Representation Form:** available electronically on the Council's website (<https://info.westberks.gov.uk/localplanreview2036>) and in hard copy at the following location:

- West Berkshire Council Offices, Market Street, Newbury, RG14 5LD between the hours of 8:30am and 5:00pm on Mondays to Thursdays and 8:30am and 4.30pm on Fridays. Please note that opening hours may be subject to change at short notice due to Covid-19 restrictions.

All representations must be received by **4:30pm on Friday 5 February 2021:**

- By email to [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk); or
- By post to the Planning Policy Team, Development and Planning, West Berkshire District Council, Market Street, Newbury, RG14 5LD.

After this consultation ends, we will consider all responses we receive and prepare the draft version of the Local Plan Review which we hope to publish in Spring 2021.

If you have any queries relating to this consultation, please do not hesitate to contact the Planning Policy Team at [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk) or 01635 519 111.

Yours faithfully,

Gary Lugg  
Head of Development and Planning

*You have been sent this letter because you are either a statutory consultee, have previously made representations on the Local Plan, or have asked to be kept informed. If you no longer wish to be contacted please let us know.*

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Introduction & Background

### (Proposed Submission LPR reference: Introduction & Background)

Number of responses received: 37

Respondent	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr702)	<p>As the Council's Archaeologist I welcome the opportunity to comment on new planning policies to ensure the conservation and management of the district's valuable historic environment.</p> <p>Para 1.6 I would prefer the phrase the 'natural and built environment' to be replaced throughout this document by 'the natural and historic environment'. This latter pair is the terminology used in the NPPF where it's made clear that the historic environment is all aspects of the environment resulting from the interaction between people and places through time, including landscaped, planted and managed flora. So fields, woods, commons, orchards are both natural and historic (though wouldn't be considered to be 'built').</p>	<p>Comments noted. The NPPF uses the terminology 'natural, built and historic environment' see para 8c and para 20d of that document. For consistency amend LPR as follows -</p> <p>Amend para 1.6 2<sup>nd</sup> sentence of the Emerging Draft LPR to read - 'It sets out the strategy for distributing development within the District and the policies for protecting, conserving and enhancing the natural, <del>and</del> built <u>and historic</u> environment.</p> <p>Amend para 5.30 1<sup>st</sup> sentence of the Emerging Draft LPR to read – 'One of the key issues facing West Berkshire is the conservation and enhancement of the distinctive local character of <del>both</del> the natural, <del>and</del> built <u>and historic</u> environment.</p> <p>Amend para 10.29 1<sup>st</sup> sentence of the Emerging Draft LPR to read – 'The NPPF seeks to conserve and enhance the natural, <del>and</del> built <u>and historic</u> environment....</p>

Respondent	Response	Council Response
Public Protection Partnership (lpr10)	Supports the approach	Comments noted
<b>Statutory consultees</b>		
Greenham Parish Council (lpr863)	<p>This review takes place in the middle of what is an unprecedented set of events that will radically alter the economic life of the country and its neighbours: the Covid-19 pandemic; the end of the BREXIT transition period; the enactment of related legislation (Agriculture and Environment Acts); and declaration of a Climate Emergency by both West Berkshire District Council and the UK Government. Yet almost all the evidence based upon which the Local Plan policies presented here are derived pre-dates these events.</p> <p>GPC therefore question whether it is possible to conclude the process of adopting the new Local Plan before further data is gathered on certain aspects. We are proceeding to comment on the Plan with that major <i>caveat</i> and urge the Authority to consider an early review of the evidence and categorically state that some aspects of policy will need amending as soon as the impacts of these events are clear.</p> <p>We refer again to this point in our comments on a number of specific policies.</p> <p>GPC would like to see consideration given to an interim review of the newly adopted Local Plan when the impacts of the major changes in context have become clearer in, say, 2024.</p> <p>In 1.12, we welcome the bringing together of three documents in one. However we are concerned that the Sustainability Appraisal (SA) and other supporting evidence is not also being actively consulted upon at this time, because in the past it has proved as important to site promoters, developers and the Planning Inspector as the Local Plan itself. In 1.29 you say it “is intended to be an integral part” of this process, yet there has been no attempt to encourage consultees such as local councils to comment on the SA. We see this as a serious omission. Even the Opposition Members on the Planning Advisory Group were unaware until well into the consultation (on 14<sup>th</sup> Jan) that the SA was published and at the time of writing (19<sup>th</sup> Jan) there is no sign of the Infrastructure Delivery Plan and several other key documents.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.</p> <p>An interim SA report was published for consultation at the same time as the Emerging Draft of the LPR in December 2020.</p> <p>The Draft IDP was published on the Council’s website in October 2021. It is currently being updated and will be published alongside the Proposed Submission LPR.</p>
Hungerford Town Council (lpr118)	Supports the approach. We agree with the need for an up to date Local Plan that reflects the priorities of West Berkshire and provides some protection from inappropriate developments.	Comments noted

Respondent	Response	Council Response
<p>Newbury Town Council (lpr1100)</p> <p>Newbury Town Council (lpr2275)</p>	<p>This review takes place in the middle of what is an unprecedented set of events that will radically alter the economic life of the country and its neighbours: the Covid-19 pandemic; the end of the BREXIT transition period; the enactment of related legislation (Agriculture and Environment Acts); and declaration of a Climate Emergency by Newbury Town Council (NTC), West Berkshire District Council (WBDC), and the UK Government. Yet almost all the evidence upon which the Local Plan policies presented here are derived pre-date these events.</p> <p>We therefore question whether it is possible to conclude the process of adopting the new Local Plan before further data is gathered on certain aspects. We are proceeding to comment on the Plan with that major caveat and urge the Authority (WBDC) to consider an early review of the evidence and categorically state that some aspects of policy will need amending as soon the impacts of these events are clear.</p> <p>We refer again to this point in our comments on a number of specific policies. We would like to see consideration given to an interim review of the newly adopted Local Plan when the impacts of the major changes in context have become clearer in, say, 2024. In 1.12, we welcome the bringing together of three documents in one. However, we are concerned that the Sustainability Appraisal (SA) and other supporting evidence is not also being actively consulted upon at this time, because in the past it has proved as important to site promoters, developers, and the Planning Inspector as the Local Plan itself. In 1.29 you say it “is intended to be an integral part” of this process, yet there has been no attempt to encourage consultees such as local councils to comment on the SA. We see this as a serious omission. Even the Opposition Members on the Planning Advisory Group were unaware until well into the consultation (on 14th Jan) that the SA was published and at the time of writing (19th Jan) there is no sign of the Infrastructure Delivery Plan and several other key documents.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.</p> <p>An interim SA report was published for consultation at the same time as the emerging draft of the LPR in December 2020.</p> <p>The Draft IDP was published on the Council’s website in October 2021. It is currently being updated and will be published alongside the Proposed Submission LPR.</p>
<p>Shaw-cum-Donnington Parish Council (lpr191)</p>	<p>Supports the approach.</p> <p>The consultation portal is exceedingly tedious. It is unresponsive with each comment taking some minutes of waiting for the site to respond. I would not be surprised if this has not reduced the amount of comment received with respondents giving up fighting the system.</p> <p>1.5 We note that the Plan will “meeting...social...priorities”. Planning applications should ensure that social infrastructure is provided including such items as parish halls, allotments, sports fields, play areas with equipment and there will be other infrastructure depending on local needs. Any planning application should provide appropriate social infrastructure either in cash and/or in kind.</p>	<p>Comments noted.</p> <p>Policy SP23 will ensure that new development is supported by adequate and appropriate infrastructure in a timely manner. This includes physical, social and green infrastructure.</p>

Respondent	Response	Council Response
<p>Stratfield Mortimer Parish Council (lpr386)</p>	<p>The Emerging Local Plan has many positive aspects:</p> <ul style="list-style-type: none"> <li>• We agree with most of the far-reaching aspirations demonstrated in the plan</li> <li>• Stratfield Mortimer is not specifically allocated any more housing</li> <li>• The aim to provide West Berkshire residents with housing of different types, sizes, tenures and affordability is stated as a priority</li> <li>• There is good emphasis on design, green spaces and biodiversity</li> </ul> <p>However, there is also much which could be improved:</p> <ul style="list-style-type: none"> <li>• There is little reference to the role of the NDP as a statutory document. NDPs should be emphasised and the legal/statutory role re site selection, design codes and contribution of local knowledge to such things as flooding and infrastructure shortcomings made clear in a statement of policy in the relevant sections.</li> <li>• There is a lack of rigour in the phrasing of many policies and inconsistent use of terms. Several say things like “we will not allow X” and then go on to say but “if it must be allowed, we will mitigate the impact on X”. That implies you can get away with having an adverse impact as long as it is not quite as bad as it might have been. Many policies use general words like, mitigate, reasonable etc. That can mean anything. They should be defined in the context of the policy. The definition of carbon neutrality for West Berks is a particular issue.</li> <li>• There is a lack of consistency and integration. Some policies say one thing in the SP (Strategic Policies) and then contradict the SP or do not follow through in the DC (Development Control) policies; an example is the Transport SP and DC policy. The Plan makes great play at the start that you have to view it as an integrated plan where you must consider all policies together. However, that is not the case when you read the whole thing. Some parts look integrated but some, noticeably the Transport policies do not seem to mesh.</li> <li>• Building Beautiful is made much of at the start of the document but then simply vanishes, from the core of the document. If there are to be new homes they should be the BEST and create a stronger sense of place than before the development. New homes are inevitable but we don’t have to have boring bog standard, off-the-peg design from national house builders.</li> </ul> <p>Amendments should be made to reduce the number of underdefined terms to ensure clarity and consistency of policy interpretation and application. Though flexibility is beneficial, clarity is needed to ensure consistency of the application of the policies. Furthermore, there are several uses of general terms such as “mitigate”, “reasonable” and “carbon neutral” which are also up to individual interpretation and should therefore be clearly defined within the context of the policy in question.</p>	<p>Comments noted.</p> <p>The Proposed Submission LPR will include an appendix which sets out how the LPR and Neighbourhood Plans will interact.</p> <p>The Proposed Submission LPR will also include a glossary.</p> <p>Planning decisions involve making a judgement and the LPR is phrased accordingly. It is acknowledged that there are some inconsistencies in formatting and these will be rectified when the Proposed Submission LPR is published.</p> <p>Policy SP7 sets out the Council’s approach to Design Quality and is clear that new development will strengthen a sense of place through high quality, locally distinctive design and place shaping.</p> <p>The Council considers it appropriate to highlight its role in mitigating and adapting to climate change under the LPRs Strategic Objectives.</p> <p>The comments relating to draft government proposals are appreciated, but as the emerging draft LPR noted, there was no certainty that the published proposals would be taken forward. In this instance, they were not.</p>

Respondent	Response	Council Response
	<p>The Local Plan should also reflect and take into account, where reasonable and appropriate, the 'Living with Beauty' and National Design Guides. For example:</p> <ul style="list-style-type: none"> <li>• Sustainable and Quality Development strategic objective 3 p11</li> <li>• Quality Design - West Berkshire Supplementary Planning Documents are dated June 2006 which are out of date.</li> </ul> <p><b>Para 1.7</b> This section sets out a very reasonable description of what the plan is for While in general agreement, should there not be something about Climate Change in 1.6 as it is such a major driver in the rest of the document?</p> <p><b>Para 1.11</b> We agree with this but with reservations: Clearly the local plan will have to align with Government Policy. However, would it not be prudent to do some scenario planning on likely ways forward that the Government might take? If nothing else, it would inform the debate about what should happen on housing policy. The preferred approach would be to give a range of likely Government requirements and outline how these would change the local plan. Even if they did not go into detail it would at least indicate the direction of travel.</p> <p><b>Para 1.14</b> This seems eminently sensible because no local area is an island. Would it not be sensible to say if WBC is doing this? The way it is worded almost sounds as if WBC are hedging their bets.</p> <p><b>Para 1.29</b> Clearly the Sustainability Appraisal is and should be integral to the Local Plan. The SA, or the relevant parts of it, should be hyperlinked where relevant to the Local Plan.</p>	<p>A Duty to Cooperate Statement will be published alongside the Proposed Submission LPR.</p> <p>Relevant hyperlinks will be included in the Proposed Submission LPR.</p>
Thatcham Town Council (lpr1397)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p><b>Section 1.4</b></p> <ul style="list-style-type: none"> <li>• "contribute to the achievement of sustainable development ... such that the right development happens in the right place at the right time benefiting communities and the economy.</li> </ul> <p>We acknowledge the needs for sustainable development and the importance of selecting the right place, at the right time. There are different pressures on communities - ensuring 'viable villages' in rural areas is as important as respecting the limits to growth in more urbanised areas that may be constrained by geography or through limits on infrastructure.</p>	<p>Comments noted</p> <p>The policies in the LPR will support in addressing the climate emergency declared by the Council in July 2019, the strategic objectives of the Environment Strategy as well as its duty to mitigate climate change in line with the Climate Change Act 2008.</p> <p>The Council has a statutory duty to prepare a Local Plan and review it every 5 years.</p>



Respondent	Response	Council Response
	<p>Where infrastructure is constraining growth in one area then it is necessary to consider growth in other areas.</p> <p><b>Section 1.12</b></p> <ul style="list-style-type: none"> <li>"the Local Plan will replace in one document the three documents listed above"</li> </ul> <p>We welcome the merger of the 3 documents as this should enable West Berkshire Council to articulate a clear strategic vision for the district. This must align with sustainable growth that takes into account the very considerable challenge of moving towards net-zero carbon by 2030.</p> <p><b>Section 1.13</b></p> <ul style="list-style-type: none"> <li>"The NPPF covers most forms of development and sets out the Government's economic, environmental and social priorities for planning in England"</li> </ul> <p>We respect that the NPPF must be followed but note other organisations and commentary have identified that the NPPF is out of step with central government statements related to net-zero. We believe that the Local Plan should be robust and reflect a net-zero policy as the NPPF itself is likely to evolve during the period of the Local Plan.</p> <p>During the period of this Local Plan consultation, we also note that central government has published its Future Home Standards including the outcome on the Part L (Building Standards) consultation. It is encouraging to see that the government states that "local authorities will retain powers to set local energy efficiency standards for new homes" and therefore West Berkshire is able to adopt standards that ensure it respects its net zero carbon objectives for the period to 2030.</p> <p><b>Section 1.15</b></p> <ul style="list-style-type: none"> <li>"The proposed submission version of the Minerals and Waste Local Plan is due to be consulted on in early 2021."</li> </ul> <p>The consultation includes for the first time the combination of the Core Strategy Development Plan Document, Housing Site Allocation Plan, and Local Plan and a parallel consultation of a Sustainability Assessment which includes a Strategic Environment Assessment, and a partly overlapping Emerging Minerals and Waste Local Plan.</p> <p>We do not believe that conducting such a broad range of consultations using the minimum consultation period, without public briefings and engagements, during a pandemic, is a good approach to democratic engagement.</p> <p><b>Section 1.16</b></p> <ul style="list-style-type: none"> <li>"Neighbourhood plans must be in general conformity with, and reflect the strategic policies in, the Local Plan Review. Neighbourhood plans should not promote less development than set out in the Local Plan but can promote more development."</li> </ul>	<p>The Council is still at the regulation 18 of the Local Plan process – this is the evidence gathering and informal consultation stage. The consultation that the Council has, is and still intends to do fully complies with its statutory obligations and is fully in accordance with the <a href="#">Statement of Community Involvement (SCI)</a>. The Council's timetable for the production of the LPR is set out in its <a href="#">Local Development Scheme (LDS)</a></p> <p>The Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that "<i>We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023.</i>"</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>The Proposed Submission LPR will include an appendix which sets out how the LPR policies will be applied in a Neighbourhood Plan context.</p>

Respondent	Response	Council Response
	<p>It is unclear as to what takes precedent. If an existing neighbourhood plan identifies less development than the strategic policies in the Local Plan Review does the emerging Local Plan take priority?</p> <p><b>Section 1.21</b></p> <ul style="list-style-type: none"> <li>"We also undertook focussed consultation with parish and town councils, and neighbourhood plan (NDP) groups seeking views on the sites assessed in the HELAA."</li> </ul> <p>We note that this consultation is the first opportunity that the public at large will have had to review the NE Thatcham proposal.</p> <p>We note that West Berkshire Council failed to include the Thatcham Town Council objections to the site THA20 in the Site Assessment.</p> <p>It is necessary for the Site Assessment to be updated and for a revision list to be included for the entire consultation that reflects changes made during the consultation.</p> <p>At a minimum it is necessary for the revision list to include:</p> <ol style="list-style-type: none"> <li>That Thatcham Town Council object to the site assessment for THA20</li> <li>When changes were made to the statements related to publication of the Infrastructure Delivery Plan.</li> </ol> <p><b>Section 1.22</b></p> <ul style="list-style-type: none"> <li>"The document being consulted on has been produced during extraordinary times."</li> </ul> <p>We respect this but would like to record that the same pressure to those people preparing a response. This consultation contains 250 pages, but by far the most important information for Thatcham is contained within the evidence packs of which there are many thousands of pages and over 60 documents, appendixes, and spreadsheets. As this LPR impacts on Thatcham disproportionately we do not believe that sufficient attention to public consultation has been considered, nor has there been a sufficient time between Officer Briefing (from 12th January) to enable a Town Council to consult with residents and prepare a consultation response.</p> <p>The impact of Covid and Brexit will both lead to unpredictable changes to economic patterns, labour demand and land use. The impact of Brexit will be unclear for some time, but it raises the question of whether it is an appropriate time to set a strategic direction that includes employment centres and economic development when the business environment is so uncertain.</p> <p>It is necessary that West Berkshire Council reach out to the residents of Thatcham with direct mailshots, more detailed (virtual) briefings where the public can ask questions directly, and social media engagement prior to the second stage of consultation.</p>	<p>An update to the HELAA will be published as part of the LPR evidence base alongside the Proposed Submission LPR.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>Paragraph 1.22 of the emerging draft LPR did acknowledge that <i>'There are still aspects of the LPR which need further work. For example, an updated Policies Map has yet to be produced as there is still work to do on finalising settlement boundaries and town centre boundaries. The document being consulted on has been produced during extraordinary times and some activities such as site visits have taken far longer than usual to plan and undertake.'</i></p> <p>Paragraph 1.26 also noted <i>'As this is an emerging draft version of the LPR, not all evidence has been completed. The evidence base will be added to as the plan progresses.'</i></p> <p>The Draft IDP was published on the Council's website in October 2021. It is currently being updated and will be</p>

Respondent	Response	Council Response
	<p><b>Section 1.24</b></p> <ul style="list-style-type: none"> <li>"One of the key features of the plan-led system is that development plans should be based on up-to-date evidence. The LPR is underpinned by a wide-ranging evidence base, which has been prepared and reviewed over the past three years."</li> </ul> <p>We agree that any plan should be based on evidence. We note that evidence has been collected prior to the Covid crisis. It would be inappropriate to base employment patterns, mobility patterns, and traffic profiles on a period during Covid as this does not represent historical patterns.</p> <p>Brexit also creates great uncertainty on future employment patterns. This will create fundamental change that means labour and economic growth forecasts are already outdated.</p> <p>The Sustainability Appraisal does not refer to WBC Environment Strategy, there is a lack of evidence related to recording of air quality in a recognised air-quality management area, and the traffic assessment is incomplete and misleading. The failure to publish the Infrastructure Delivery Plan, which is baseline material for the Sustainability Appraisal, is a significant failing in the evidence base.</p> <p>Taken together we do not believe the evidence base for the Local Plan is sound.</p> <p><b>Section 1.25</b></p> <ul style="list-style-type: none"> <li>"evidence can be broken down ... views and experiences of our local communities"</li> </ul> <p>We appreciate that the experiences of local communities will be considered. This is particularly relevant for Thatcham as the proposed development is of such a scale that input from a wide range of stakeholders must be sought. Where there are inconsistencies between the evidence prepared by external consultants sought during the Covid period, and those of local communities we would expect the balance of evidence to be biased towards the community.</p> <p>We provide feedback from residents that Town Councillors have collected from social media to support the basis for our response. This feedback reflects &gt;2,500 responses through a combination of resident's petitions and Councillor led surveys.</p> <p><b>Section 1.28</b></p> <ul style="list-style-type: none"> <li>All local plans must be accompanied by a sustainability appraisal (SA) of the plan. The SA offers a systematic and robust way for checking and improving on plans and their policies as they are being developed.</li> </ul> <p>We note the SA is also an interim document, and open to comments.</p> <p>We refer to the SA in more detail in our response to SP 17.</p> <p><b>Section 1.30</b></p>	<p>published alongside the Proposed Submission LPR.</p> <p>An air quality assessment will be published as part of the LPR evidence base.</p> <p>The other issues raised are considered as part of the overall Council's response to Policy SP17</p>

Respondent	Response	Council Response
	<ul style="list-style-type: none"> <li>"We will also finalise any outstanding evidence and prepare the next version of the LPR ... to consult in May 2021"</li> </ul> <p>We refer to the previous comments. These are extraordinary times, and should further evidence be required, such as employment patterns, mobility, or traffic flow, it will be impossible to collect meaningful data. This calls into question what appears to be a very aggressive consultation period, for a complex consultation that for the first time is bringing together three reports and a sustainability assessment.</p> <p>We believe that it is essential that WBC take into account the responses from residents and consultees ensuring a democratic approach is taken towards the second phase, which includes residents' briefings such as those proposed in response to Section 1.22.</p>	
Environment Agency (lpr1655)	<p>Thank you for consulting us with your draft Local Plan Review to 2037. We have reviewed the policies and site allocations in relation to our remit on flood risk, biodiversity and conservation of fisheries and the water environment, groundwater quality and contaminated land, water quality and water resources.</p> <p>We have provided our comments and recommendations in the format of the ordering of your policies which are of relevance to our remit, including the supporting text to these policies. We have also provided some general comments on broader issues such climate change, to provide oversight.</p> <p>We have made comments on site allocations which have environmental constraints within our remit, along with relevant evidence based documents supporting your local plan, such as the Water Cycle Study scoping document.</p> <p>In summary, there are some significant issues with the West Berkshire District Council Local Plan Review Draft that need to be resolved prior to the Regulation 19 stage of the plan making process. These are mainly in relation to the water environment and water quality. However, we are willing to support you going forwards and hope that these issues can be overcome as the local plan progresses.</p>	Comments noted. Responses to the more detailed comments raised are made under the relevant policies.
Historic England (lpr1565)	<p>As the government's adviser on the historic environment, Historic England is keen to ensure that protection of the historic environment is fully taken into account at all levels and stages of the local planning process.</p> <p>We have concerns about the lack of conservation area appraisals in West Berkshire, as well as a number of other issues, some of which relate to soundness. These are set out in detail [under the relevant policy]. Links to our published advice and general comments on planning for the historic environment can be found in [the attached document].</p> <p>There are 53 conservation areas in West Berkshire but 51 of have no conservation area appraisal, including all of those located in and around Newbury. We appreciate that</p>	<p>Comments noted.</p> <p>CAAs are considered under the Council's response to Policy SP9</p> <p>Clarify policies by amending para 1.27 of the Emerging Draft LPR as follows – 6<sup>th</sup> bullet 'Strategic policies (SP)', 7<sup>th</sup> bullet 'Non-strategic site allocation policies (RSA)' and</p>

Respondent	Response	Council Response
	<p>councils have resourcing issues and that the legislation only requires appraisals to be carried out from time-to-time. However, in this case, we consider it appropriate for the local plan to make a specific and measureable commitment to publish appraisals. These should be prioritised taking into account factors such as planned development and sensitivity to change. The Council's conservation officers should be able to advise in this respect. Clearly, it will be for the Council to determine its own resource availability but we would suggest, based on experience from elsewhere, that a commitment to completing at least five conservation area appraisals per year should not be unreasonable.</p> <p>From reading the section on strategic policies on page 8, and from the 'SP' naming, the strategic policies in the plan can be inferred. However, NPPF paragraph 21 states that plans should be explicit about which policies are strategic. This should therefore be clarified.</p>	8 <sup>th</sup> bullet 'Development <u>Management</u> <del>control</del> (DM) policies'
Natural England (lpr1592)	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We thank West Berkshire District Council for its engagement with Natural England from an early stage in the process, and for paying heed to our advice on housing and economic site allocations, particularly with reference to the North Wessex Downs AONB.</p> <p>We have a number of comments on the various policies and site allocations. We recommend these are duly and fully considered as part of our statutory response. We have considered and commented on the policies in the order they appear in the Local Plan. <i>[see individual policies for details]</i></p> <p>We would be very happy to comment further as the plan process progresses.</p>	Comments noted
<b>General consultation bodies</b>		
British Horse Society (lpr822)	<p>Please note that these comments from The British Horse Society (the Society) relate to how proposed development could affect the Horse Industry and in particular how development could impact on riding on public highways (including public rights of way) and open spaces. It has been prepared in parallel with the response from the Mid &amp; West Berks Local Access Forum which has sent in a separate response. Some of the Society's comments repeat and thus endorse those of the Forum's.</p>	Comments noted
Central Bedfordshire Council (lpr27)	<p>Thank you for consulting the Shared Minerals and Waste Planning Service on the West Berkshire Local Plan Review. The Shared Service has no comments to make on the emerging plan and unless future iterations incorporate minerals and waste planning</p>	Response noted

Respondent	Response	Council Response
	matters which may affect Bedford Borough, Central Bedfordshire or Luton Borough, the Shared Service does not wish to be consulted.	
CLY Pipeline System (lpr29)	Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.linerearchbeforeudig.co.uk">www.linerearchbeforeudig.co.uk</a> , our free online enquiry service.	Response noted
Heritage Forum (lpr63)	<p>Supports the approach.</p> <p>1.11 We assume that this refers to the White Paper "Planning for the Future" (August 2020). We are concerned that developments in Renewal Areas, as defined in it, will not be subject to planning applications under the present form and process.</p> <p>1.24 Completion of the Conservation Area Appraisals will be necessary to achieve this objective, by enabling us to assess what heritage is unique and should be conserved.</p>	Comments noted. CAAs are considered under the Council's response to Policy SP9
Jockey Club Estates (lpr1908)	<p>JCE considers that the plan (including the associated evidence base) should accommodate the following matters:</p> <ol style="list-style-type: none"> <li>1. Acknowledgment and consideration of the importance of the HRI when assessing the options for the strategic distribution of growth – the baseline information signalled as being prepared in this regard must be incorporated in further SA work;</li> <li>2. The need to ensure that distribution options avoid or minimise impacts on the HRI since the HRI is not susceptible itself to seeking alternative locations or options (other than on a very local scale).</li> <li>3. The need for appropriate policies to protect the industry both from itself and from other development that may impact upon it.</li> </ol> <p><b>General</b></p> <p>JCE notes and welcomes the reference at paragraph 4.15 to Lambourn being the heart of one of the most important areas for horseracing in the country. It also welcomes the reference at paragraph 11.41 to the importance of the industry to the local rural economy. However, JCE considers that this underplays the contribution that the industry currently makes to the wider economy given the national importance of horseracing to the economy and the complementary role that various horseracing locations around the country have in this regard. Lambourn is an area of growing importance to the industry and is one that JCE is very keen to protect.</p> <p>JCE considers that it is important that the evidence for the Local Plan includes documents that clarify the economic significance to the area so that the impacts of development proposed through the Local Plan can be fully understood and evaluated.</p>	<p>Comments noted and the general support of the Jockey Club Estates is welcomed.</p> <p>Specific comments in relation to the Sustainability Appraisal are dealt with as part of the Council's response to comments on that document.</p> <p>Comments in relation to the Site Selection Background Paper will be incorporated as appropriate into that document, an updated version of which will be published at the Proposed Submission stage.</p> <p>Comments in relation to the horseracing industry are dealt with as part of the Council's response to those issues under Emerging Draft LPR Policy DC34.</p>

Respondent	Response	Council Response
	<p>The importance of the industry stretches beyond economic considerations. It also contributes to the characteristics of the area and assists in making the area an extremely beautiful place to live, work and visit. JCE considers that the next stages of the Plan will need to ensure that this is adequately explained and evidenced with appropriately worded policies to deliver the protection and support for growth that appears to be within the Regulation 18 documents. To assist in this regard, JCE has provided comments on the consultation documents.</p> <p>We consider first the evidence base documents before moving on to the Local Plan.</p> <p><b>Interim Sustainability Appraisal (SA) Report, December 2020</b></p> <p>JCE notes and is pleased to see the acknowledgement in Appendix 1 of this document regarding the gap that exists in the baseline studies relating to the HRI and the intention of the Council to fill this. This is reiterated at paragraph 2.10 of the document. JCE requests that the details of the additional baseline work be identified along with a timeline for the publication of this work. It notes that this information is not included in Appendix 2 of the SA, which relates to baseline information. JCE also offers its continued assistance in preparing this work.</p> <p>The Council is aware of the report that JCE commissioned from SQW to identify the HRI's economic and social impact in Lambourn Valley (Horse Racing in Lambourn Valley: The Industry's Economic and Social Impacts by SQW). It confirmed that the industry directly employs over 500 people (FTE) with over 160 people (FTE) employed in services that are related to the industry. It also contributes £22.6m to the local economy. This is an important summary of the economic significance of the industry that JCE considers should be included in the evidence base for the Local Plan. This is especially significant as the Western Berkshire Economic Development Needs Assessment (2016) only makes one passing reference to the HRI at paragraph 3.12.</p> <p>JCE considers that the Local Plan evidence base should include reports that measure the importance of the industry and explain how this will be protected. Especially in light of the acknowledgement at paragraph 5.35 of the Berkshire Functional Economic Market Area Study, 2016 regarding the challenges that the rural characteristics of the area create to economic development. The HRI is an appropriate industry that complements the character of the rural area and can continue to ensure the economic strength of these challenging areas. This should be recognised in the evidence base documents and should be a consideration of the SA work.</p> <p>JCE notes that SA Objective 10 (economic considerations) includes reference to the impact of policies on the needs of the HRI. It is unclear how that appraisal can be carried out without the baseline evidence being updated in the manner described above. Aligned</p>	

Respondent	Response	Council Response
	<p>with this is the need to understand the housing needs of the HRI. Sufficient and appropriate housing for HRI staff has a direct impact on the ability of the industry to survive and it is important that the housing needs of this industry are adequately understood. This is relevant to both SA Objective 10 and SA Objective 1 (housing).</p> <p>To assist the Council in its understanding of the housing needs of part of the HRI, JCE attaches a report prepared by the University of Cambridge on behalf of Racing Homes, the housing arm of Racing Welfare. Racing Homes is a registered charity with properties in West Berkshire. The attached report summarises the housing issues faced by those employed in the HRI and incorporates a number of recommendations, some of which are relevant to Local Plan considerations. JCE commends this report as a document to add to the Council's evidence base.</p> <p>SA Objective 10 stops short of considering the impact of policies on the existing HRI. This should be explicitly identified, and the relevant evidence base documents used to assess this should be referred to.</p> <p>JCE is concerned that the absence of the information referred to above means that the subsequent assessment of policies and allocations against the Strategic Objectives does not adequately consider the implications for the HRI. This is compounded by the fact that the Local Plan does not contain a specific policy that seeks to protect the HRI. This is discussed further in the Local Plan section below.</p> <p><b>Site Selection Background Paper</b></p> <p>JCE requests that this background paper is updated to reflect new evidence base documents recommended by JCE and identified as forthcoming in the SA. The implications of the site selection process on the HRI should be clearly and readily identifiable given the acknowledged importance of this industry to the area. The absence of this means that it is not possible to conclude that the site selection process has adequately considered this important matter and in turn means that the considerations cannot be adequately reflected in the SA process.</p> <p><b>HRI information</b></p> <p>In addition to the matters referred to above, JCE recommends and advocates the inclusion of a document that summarises the location of HRI activities within the District. It is important that the Plan acknowledges the differences between the activities centred on Lambourn and those in the wider area. Collectively, these contribute to the area being known as the Valley of the Racehorse, but the location of the individual activity creates different issues that should be taken into account when applying development plan policy.</p>	



Respondent	Response	Council Response
	<p>JCE offers its support in identifying these locations and the implications that they have in the consideration of development proposals – both for HRI-related uses and other uses that may impact on the HRI. (see <i>lpr1907</i> for comments on evolving draft LPR)</p>	
<p>Mid &amp; West Berkshire Local Access Forum (lpr1895)</p>	<p>MWBLAF welcomes and supports the detailed and systematic assessment in the Detailed Sustainability Appraisal of the impact of each development on public rights of way and open spaces, for example:        GREE 8 (Sandleford): Public Right of Way GREE/9/1 traverses the site. The developer would incorporate this within the development, in addition to providing additional PROW as appropriate. Public open space and green and blue infrastructure to support the development would be provided with development.        SP17 (North East Thatcham): Public Rights of Way THAT/4/1, THAT/3/3, THAT/2/1, THAT/3/5, THAT3/1/, THAT/1/1, traverse the site. The developer would incorporate these within the development, in addition to providing additional PROW as appropriate. Public open space and green and blue infrastructure to support the development would be provided with development.        RSA 3 (Speen): Overall, in terms of environmental and social sustainability, development of the site would have a positive impact. If the allotments were not retained or re-provided Public Right of Way (PROW) were not protected there could be a negative impact on environmental social sustainability.        It appears from paragraph 1.2 of the interim Sustainability Appraisal and Strategic Environmental Assessment and paragraph 32 of the National Planning Policy Framework that this assessment is used in the preparation of the Local Plan and does not form part of the Plan once approved:        Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. Therefore, the key conclusions of the assessment and any avoidance, mitigation or enhancement measures required must now be added to the Local Plan.        Some elements of the assessments appear to describe the present intention of the current proponent of the site – “The developer would ...”. The wording of these need to be amended to become requirements.        The Forum requests that the key conclusions of the Detailed Sustainability Appraisal of Site Options and any avoidance, mitigation or enhancement measures are included within the relevant policies in the Local Plan document.</p>	<p>Comments noted.</p> <p>The SA process is an integral part of the preparing the LPR and the Council confirms it will continue to inform and influence the plan as it evolves.</p>

Respondent	Response	Council Response
North Wessex Downs AONB (lpr1630)	We would commend you on this first draft which clearly reflects the scale of designation within West Berkshire and the desire to create a landscape led approach. I have already advised a neighbouring LPA to take note of your plan.	Comments noted
Transport for London (lpr26)	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the emerging draft of the West Berkshire Local Plan Review.	Response noted
West Berkshire Green Exchange (lpr1546)	<p>This response is submitted by the committee of the West Berks Green Exchange (WBGE) on behalf of its members.</p> <p>WBC has declared a climate emergency and although the LPR document makes reference to WBC's environmental strategy, there is no sense that planning needs to change sufficiently to deliver the results called for in the environmental plan. In fact, as the Environmental Implementation Plan has not yet been produced, it cannot be known what results are required of planning, which makes the issue of this document, at this time, bizarre.</p> <p>We question whether this is the right time to produce a local plan before thoroughly researching the requirements of local people for living, working and travelling. There has been much change during the past year (2020) because of Covid-19. We expect that there will be some permanent changes to the way in which people live and work, and that a sound plan will need to acknowledge them.</p> <p>Similarly, over the past five years, the general public has come to understand much better the threat of climate change. They require solutions to enable them to live in a carbon neutral environment and in a waste neutral environment. In other words, they require greenhouse gases and waste products to be dealt with locally and not transmitted to the atmosphere or to other places on the planet.</p> <p>There is nothing in the plan seeking to support or incentivise a reduction in the use of energy. In our recent past, post WW2, the human race has gone for economic growth at the expense of almost everything else especially the environment. We have maximised the use of most resources, especially fuel and energy. This has resulted in the evils of climate change and environmental degradation and breakdown, the costs of which will be huge as sea level rise takes its toll on seaside communities, ports and also on land for food production. We are in danger of making the same mistakes again as we bolster economic growth with the maximum use of resources instead of going for a minimisation of energy and resource use.</p> <p>Government would seem to be adopting a policy of continuing to maximise energy use, although using renewable energy instead of fossil energy. This can be seen in its reluctance to address the extremely high energy use of existing homes and putting off</p>	<p>Comments noted</p> <p>The Council has a statutory duty to prepare a Local Plan and review it every 5 years. The Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that <i>"We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</i></p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of</p>

Respondent	Response	Council Response
	<p>maximising insulation of new homes. This policy is good for growth because it means that the replacement electrical heaters in existing homes, heat pumps instead of gas or oil boilers, are four times the size that they would have to be to if the houses were insulated properly before the heaters were replaced. That means four times the electricity use which means four times the generation capacity be it nuclear, wind, solar or tidal. This may be all very good for growth but is a disaster for the environment as it means that we have to literally scour the earth and sea bed for the minerals to build the excess heat pumps, wind turbines, solar panels and nuclear plants necessary to heat uninsulated homes. We are facing a shortage of many of the materials which are required for this high tech machinery as it is without having to ramp up electricity production to power both our houses and cars. With a policy of minimising energy use by very high level home insulation we will use much more insulation material but this, by its very nature, is mostly air so the increased material use is small. The country would save a fortune on the smaller number of wind turbines and solar panels that we have to find space for and we could save on the building of at least one new nuclear plant. The savings on energy costs to each household would also be significant and the increased comfort of a properly insulated house would be a revelation to most people and boost the health of the many in fuel poverty. And the much lower level of generation infrastructure would save pressure on the landscape of AONBs as the demand rises on government to increase electricity supply. Also much of the excess infrastructure would have to be manufactured using current fossil fuel technology worsening the current situation with regard to carbon emissions.</p> <p>Locally the increased electricity use engendered by a transfer of every home to oversized home heating installations and also the complete change over to e-car use will require a serious overhaul of the electricity delivery cabling; the digging up of every road in the district to increase the size of the cabling would be a probability. This could be minimised by a policy of energy reduction.</p> <p>The introduction of carbon neutrality as soon as possible should be essence of any policy going forward.</p> <p>With the Home Quality Mark (HQM) coming forward as a new standard for building houses, the council should require all new homes to be built to this standard rather than the sub-standard, second or third quality homes indicated in the draft plan.</p>	<p>the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>The policies in the LPR will support in addressing the climate emergency declared by the Council in July 2019, the strategic objectives of the Environment Strategy as well as its duty to mitigate climate change in line with the Climate Change Act 2008.</p>
<b>Other stakeholders</b>		
Ian Campbell (lpr860)	I sent to you earlier representations on the developing Local Plan on the 5th December 2018; 4th April 2018; and 14th January 2017. These representations are consistent with	Comments noted.

Respondent	Response	Council Response
	<p>the earlier ones and do not repeat them, except as necessary to reflect your new policies or continued omissions.</p> <p><b>DURATION OF PLAN</b> This plan ends in 2037. It says nothing about the Borough policies for the period beyond that. This is a serious omission and I suggest makes the plan unsustainable.</p> <p><b>HOUSE PRICES AND SUPPLY</b> Despite the fact that the UK has left the EU, it is unlikely that net inward immigration levels will fall to levels that invalidate the ONS housing projections. The recent declines in ageing may slow down the rate of new household formation. By looking two generations ahead it is clear many more new homes must be built in high need areas like the Thames Valley. Put bluntly where will West Berkshire's share of 200,000 +/- new homes be located in the post plan period? The plan says discussions are continuing with neighbouring councils because of the obligations of the Duty to Cooperate. No other information is provided to test the sustainability of this policy. It is not clear why there is a need for secrecy if it is the intention to win local support. The public needs to be informed about the conflicts the Local Plan seeks to resolve long before they become locally contentious. The necessity to plan far ahead is made more compelling by the recent AWE decision to extend the DEPZ around the facility at Burghfield. This decision will materially reduce the number of potential locations for major new housing supply within the Reading travel to work catchment area on unprotected land.</p> <p><b>GOVERNMENT WHITE PAPERS</b> This draft says nothing about the two government white papers published last year, Planning for the Future and the formula for housing numbers matter. Both are expected to impact this local plan. Is it the policy of the Borough to ignore the direction of travel they suggest? It seems so, as this Plan is silent. In a growth area needing strong, far-sighted local leadership is silence a sufficient response? Sustainable planning needs to be pro-active. Relying on the private sector, being re-active is not sufficient, as the example of Grazeley shows. A shrewd, pro-active council will know where it wants long term growth to be directed, following thorough desk-top studies with their neighbours. It will be taking steps to take control of these locations far ahead, enabling them to use their powers to capture for their local communities most of the uplift in value planning consent creates. There are some highly effective private sector landed estates examples to follow, such as the Crown Estate, the well-endowed Oxbridge colleges and others, both rural and urban.</p> <p><b>STRIKING THE RIGHT BALANCE</b></p>	<p>The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>Paragraph 22 of the NPPF was updated in July 2021 to state that '<i>Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</i>' The Council has therefore undertaken further longer term visioning work for Newbury and Thatcham which will be published as part of the evidence base for the LPR.</p> <p>A Duty to Cooperate Statement will be published alongside the regulation 19 version of the LPR.</p> <p>The LPR is being prepared in the context of, and is supported by, a vast amount of national and local information and numerous professional studies.</p> <p>Policy SP12 sets out the Council's approach to the delivery of housing and this will be underpinned by a Housing Background Paper which will be published at Proposed Submission stage.</p>

Respondent	Response	Council Response
	<p>Nearly ten years the coalition devolved responsibility for spatial housing policy to local councils has passed. In the time price/rent affordability as worsened. This outcome cannot be overlooked by any government. Thames Valley councils, enjoying the benefits of strong local economies must also accept their spatial responsibility for providing enough houses in the locations of need. I suggest this short term Local Plan fails to discharge this obligation.</p>	
Gary Clarke (lpr700)	<p>Objection to the plan in general  This local plan is not an effective or persuasive vision for the future relying as it does on predictions and forecasts about economic growth in West Berkshire and specifically a reliance on the need for office space.  A more imaginative solution is required post covid to meet section 1.4. Without infrastructure improvements simply adding houses is unsustainable and is not the right development in the right place at the right time. Developers pressure to build on land in North Thatcham should be resisted.</p>	<p>Comments noted</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>The Draft Infrastructure Delivery Plan (IDP) is currently being updated and will be published alongside the Regulation 19 Local Plan Review.</p> <p>Comments in relation to the proposed development at North East Thatcham are dealt with as part of the Council's response under Policy SP17.</p>
Richard Foster (lpr741)	<p>This local development plan (LDP) is such a major document and will have such a huge effect on Thatcham that it warrants much more publicity than it is currently getting, e.g. through real presentations (not online) particularly among residents of Thatcham, and more opportunity for them to comment thereafter. I urge WBC to put approval of this document on hold until the lockdown is over and a much fuller consultation can take place.  The document feels as though it could have been written in the 1990s, in that it expects development of that type: small, boxed-in, poky little houses. There is no sense of the way</p>	<p>Comments noted</p> <p>The Council has a statutory duty to prepare a Local Plan and review it every 5 years. The Council is still at the regulation 18 of the Local Plan process – this is the evidence gathering and informal consultation stage.</p>

Respondent	Response	Council Response
	<p>in which society has changed in the last 30 years, and particularly in the last year under Covid, with more people working from home and less travelling. Rural villages have problems that are not being addressed, such as housing that is too expensive for young people, loss of essential services such as post offices, shops and pubs, and loss of bus routes making travel difficult. One answer to some of these problems is to put more development into the villages, which would mean challenging the constraints of the AONB, but the planners do not seem willing to do this.</p> <p>Town centres, too, have changed in that time. Many retail outlets have closed because of the competition from online shopping, and will probably never reopen. That real estate could become available for accommodation, but the plan shows no intention of using that resource.</p> <p><b>Summary</b> - This feels like a rushed plan that is being issued without proper publicising and debate, compounded by the restraints of Covid. Furthermore it is backward looking and fails to address basic issues, particularly on transport. It fails to justify the imposition of a massive number of homes on Thatcham and it pays lip service to achieving zero carbon without knowing what that actually involves because it precedes, when it should follow, the Council's implementation plan on its environmental strategy. It should be withdrawn until such time as its deficiencies are addressed and a proper face-to-face set of presentations can be given to the people of Thatcham, the community that it affects most.</p>	<p>The consultation that the Council has, is and still intends to do fully complies with its statutory obligations and is fully in accordance with the <a href="#">Statement of Community Involvement (SCI)</a>. The Council's timetable for the production of the LPR is set out in its <a href="#">Local Development Scheme (LDS)</a></p> <p>The Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that <i>"We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</i></p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and</p>

Respondent	Response	Council Response
		<p>Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>Policy SP2 sets out the Council's overall planning policy approach to the AONB. The policy is clear that the AONB will have appropriate and sustainable growth over the plan period. The policy has to be set within a national planning policy context. The NPPF para 172 is clear that the scale and extent of development in AONBs should be limited and that planning permission for major development should be refused except in exceptional circumstances.</p> <p>Comments in relation to the proposed development at North East Thattham are dealt with as part of the Council's response under Policy SP17.</p>
Peter Grey (lpr685)	<p>To release this important Consultation with its abbreviated time frame for a response, without adequate dissemination and at a time of a national pandemic, was both insensitive and questionable.</p> <p>I have read the whole Consultation document and I have seen the comments of Thattham Town Council, Bucklebury and Midgham Parish Councils, and I fully endorse and support all of their objections.</p> <p>Furthermore, I live close to the affected area and, therefore, have no wish to support a proposal that would effectively transform the identity of my village from a pleasant rural idyll, to a dormitory suburb of a sprawling Thattham New Town.</p> <p>I am seeking a realistic extension of the consultation period, to accommodate the representations of all interested parties, whose opinions should be canvassed on a more widespread basis.</p> <p>I would also like WBC to explain the background and genesis of this proposal, and why it chose to release it shortly before Christmas, and during a devastating, national pandemic, when it must have been patently obvious that relevant populations and institutions would</p>	<p>Comments noted.</p> <p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that <i>"We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</i></p> <p>A written ministerial statement (<a href="https://questions-">https://questions-</a></p>

Respondent	Response	Council Response
	<p>be preoccupied with other more immediate family, health and social concerns. At best, this was extremely poor timing and at worst, just plain cynical.</p>	<p>statements.parliament.uk/written-statements/detail/2021-01-19/hcws720) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>The Council has a statutory duty to prepare a Local Plan and review it every 5 years. The Council is still at the regulation 18 of the Local Plan process – this is the evidence gathering and informal consultation stage. The consultation that the Council has, is and still intends to do fully complies with its statutory obligations and is fully in accordance with the <a href="#">Statement of Community Involvement (SCI)</a>. The Council's timetable for the production of the LPR is set out in its <a href="#">Local Development Scheme (LDS)</a></p> <p>Comments in relation to the proposed development at North East Thatcham are dealt with as part of the Council's response under Policy SP17.</p>



Respondent	Response	Council Response
<p>Ian Halliday (lpr590)</p> <p>Jane Halliday (lpr591)</p>	<p>The Local Plan is based on evidence that largely predates the current pandemic, Brexit and related legislation on agriculture and the environment, declaration of a climate emergency by the council, and the government's plans to change the entire planning system.</p> <p>I believe that these factors will have a major impact on planning issues. For example, Covid-19 will lead to big changes in the way people work, whether or not they commute, where they shop, and so on. There is a danger that the Local Plan will be out of date as soon as it is published.</p> <p>It is vital that these various factors be taken into account when drawing up the Local Plan, and consequently, the Plan should be reviewed specifically in the light of the current circumstances and new government environmental policies before being approved.</p> <p>The Plan should be reviewed specifically in the light of the current circumstances and new government environmental policies before being approved.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p>
<p>Councillor Alan Law (lpr1075)</p>	<p>In General I find the Emerging Draft to be very comprehensive and appropriate.</p> <p>Development in the countryside: I do question why so many related policies had to be rewritten. They were working well and had only been adopted since 2016. Additions and clarifications could have been made without the need for such a comprehensive rewrite.</p>	<p>Comments noted.</p> <p>The existing policies have been clarified and updated where appropriate to accord with current national policy.</p>
<p>Councillor Alan Macro (lpr749)</p>	<p>The results of traffic modelling are not included in the consultation documents. Modelling has been done, though inadequately - particularly for the Theale and Calcot area.</p> <p>Many residents' concerns about new development centre on the anticipated effect on infrastructure and services, such as highways and medical services. The omission of an infrastructure delivery plan in this draft mean they cannot determine whether planned infrastructure will be adequate.</p> <p>Full traffic modelling of the proposed development areas should be carried out and the results published and incorporated in the draft local plan.</p> <p>The infrastructure delivery plan should be developed to address problems identified in the model and incorporated in the draft new local plan.</p> <p>The revised draft, incorporating the above, should then be consulted upon.</p>	<p>Comments noted</p> <p>The Draft IDP was published on the Council's website in October 2021. It is currently being updated and will be published alongside the Proposed Submission LPR.</p> <p>Transport modelling has taken place which incorporates the combined impact of proposed new development through the plan period. Detailed transport work for each development (where applicable) will come forward at the planning application stage.</p>
<p>Susan Millington (lpr457)</p>	<p>The Local Plan is based on evidence that largely predates the current pandemic, Brexit and related legislation on agriculture and the environment, declaration of a climate emergency by the council, and the government's plans to change the entire planning</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>system. These factors will have a major impact on planning issues. For example, Covid-19 will lead to big changes in the way people work, whether or not they commute, where they shop, and so on. There is a danger that the Local Plan will be out of date as soon as it is published.</p> <p>I believe it is vital that these various factors be taken into account when drawing up the Local Plan, and urge that where necessary up-to-date evidence is gathered and incorporated into it, even if this leads to a delay. I suggest an interim review of the newly adopted plan in a year or two when the impact of these factors will be much easier to assess.</p>	<p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p>
Paula Saunderson (lpr943)	<p>I think it is unfortunate you are conducting this review when NPPF and more detailed planning policies are under review. Likewise the implications of the new Environment bill are not fully understood (if it ever gets into statute) and I do not see in your documents any urgent drive to commit to the Climate Change target you voted for. Also the implications of the pandemic are not yet fully understood in terms of impacts on Population levels, Density Patterns, and Employment practices.</p> <p>I do not think you have undertaken the Consultation in a very robust way, as with no Section 18 Public Exhibitions taking place these should have been conducted virtually with the opportunity to display key data visually on Presentation Boards, and the opportunity to question Planning Officers (not the odd Cllr as they come and go).</p>	<p>Comments noted.</p> <p>The Council has a statutory duty to prepare a Local Plan and review it every 5 years.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>The Council is still at the regulation 18 of the Local Plan process – this is the evidence gathering and informal consultation stage. As para 2.21 of our SCI notes, <i>'The exact nature of our consultation will depend on the nature of the document being produced and the ways in which we involve the community will depend on the stage we are at in the preparation of that document.'</i></p>

Respondent	Response	Council Response
		The consultation that the Council has, is and still intends to do fully complies with its statutory obligations and is fully in accordance with the <a href="#">Statement of Community Involvement (SCI)</a> .
Graham Storey (lpr559)	<p>The Plan is based on evidence that largely predates the current pandemic, Brexit and related legislation on agriculture and the environment, declaration of a climate emergency by the council, and the government's plans to change the entire planning system. These factors will have a major impact on planning issues. For example, Covid-19 will lead to big changes in the way people work, whether or not they commute, where they shop, and so on. There is a danger that the Local Plan will be out of date as soon as it is published.</p> <p>It is vital that these various factors be taken into account when drawing up the Local Plan, and I strongly urge that where necessary up-to-date evidence is gathered and incorporated into it, even if this leads to a delay. There should be an interim review of the newly adopted plan in a year or two when the impact of these factors will be much easier to assess</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p>
Councillor Tony Vickers (lpr117)	<p>Throughout this consultation, we find it difficult to choose between "yes" and "no". As we have consulted widely within the local Liberal Democrat Party which we here represent - and beyond among our apolitical contacts - we have found increasing levels of disquiet about the lack of detail on the potential impact of development upon communities. So we have moved from "Yes" to "No" in this first question.</p> <p>In general, we welcome the updated Local Plan and the overall approach taken. In several places however, we wish to see it strengthened.</p> <p>1.4 refers to "sustainable development" but it is some way into the document before any mention is made of a Climate Emergency. Nothing could compromise "the ability of future generations to meet" their needs more than for governments to fail to take every possible measure NOW and hereafter to tackle climate change. So this is 'front and centre' in all our comments.</p> <p>We realise that this Plan can only be made within the context of existing national and local policies but we have to assume that those policies will also take account of the climate crisis and that during the Plan period - even before the next regular review of this Council's Local Plan - significant advances in both technology and policy will occur. Therefore we look for the Plan to be sufficiently robust yet flexible not to become a barrier to progress towards achieving the 2030 Carbon Neutral target of the Council.</p>	<p>Comments noted.</p> <p>It is agreed that the LPR needs to be both robust and flexible.</p> <p>Paragraph 1.22 of the emerging draft LPR did acknowledge that <i>'There are still aspects of the LPR which need further work. For example, an updated Policies Map has yet to be produced as there is still work to do on finalising settlement boundaries and town centre boundaries. The document being consulted on has been produced during extraordinary times and some activities such as site visits have taken far longer than usual to plan and undertake.'</i></p>

Respondent	Response	Council Response
	<p>1.7 states that the LPR must be read as a whole. It has been difficult to comment on many sections in the absence of information that hasn't been presented yet, such as the Infrastructure Development Plan (Appendix 5). Many residents' concerns about new development centre on the anticipated effect on infrastructure and services, such as highways and medical services. The omission of an infrastructure delivery plan in this draft mean they cannot determine whether planned infrastructure will be adequate.</p> <p>It has also hampered our work not to have been told that other evidence was made available on the website after the launch of this consultation. We should not have had to check on a daily basis: we should have been told immediately when it was published there. The results of traffic modelling are not included in the consultation documents. Modelling has been done, though inadequately - particularly for the Theale and Calcot area. But not nearly enough has been done for Thatcham to allay the strong feeling that the town is being "put upon". We realise that traffic modelling is expensive but it is vital that more is done - and seen to be done - before any Plan is presented to the Inspectorate.</p> <p>Full traffic modelling of the proposed development areas should be carried out and the results published and incorporated in the draft local plan.</p> <p>The infrastructure delivery plan should be developed to address problems identified in the model and incorporated in the draft new local plan.</p> <p>The revised draft, incorporating the above, should then be consulted upon.</p> <p>Our comments relate to past process and not to content of the current Draft. Please note and action as appropriate.</p>	<p>The Draft IDP was published on the Council's website in October 2021. It is currently being updated and will be published alongside the Proposed Submission LPR</p> <p>Transport modelling has taken place which incorporates the combined impact of proposed new development through the plan period. Detailed transport work for each development (where applicable) will come forward at the planning application stage.</p> <p>The proposed highways and other transport/travel mitigation packages for the NET site will be identified as part of the LPR Transport Assessment to be submitted for the Local Plan examination.</p>
<p>Barton Willmore for Hallam Land Management &amp; Wilson Enterprises (lpr2396)</p>	<p>On behalf of Hallam Land Management and Wilson Enterprises Ltd, we are pleased to be able to provide the following comments in relation to the above consultation document, with particular consideration given to the proposed new community at Grazeley.</p> <p>For more than five years Grazeley has been jointly promoted as a new Garden Town by Wokingham Borough Council, Reading Borough Council and West Berkshire Council. It is a new settlement that would provide around 10,000 new homes in Wokingham Borough and around 5,000 new homes West Berkshire. It is disappointing to see the West Berkshire stepping back from the project in this draft local plan as set out below.</p> <p><b>Timing and Process of the Publication of this Local Plan</b></p> <p>The Council's latest Local Development Scheme (LDS) was published in April 2020, not long after Lockdown 1 of the UK Coronavirus pandemic. In this document the Council has set out that public participation at Regulation 18 stage was scheduled to take place "December 2017 to September 2021" with Regulation 19 consultation on the proposed</p>	<p>Comments noted.</p> <p>The consultation that the Council has, is and still intends to do fully complies with its statutory obligations and is fully in accordance with the <a href="#">Statement of Community Involvement (SCI)</a> and its Duty to Cooperate.</p> <p>The Council is still at the regulation 18 of the Local Plan process – this is the evidence gathering and informal consultation stage. As para 2.21 of our SCI notes, <i>'The exact</i></p>

Respondent	Response	Council Response
	<p>submission document anticipated in May 2021. This LDS was amended, prior to publication, to enable the West Berkshire Local Plan to follow the Wokingham Local Plan, including its allocation of Grazeley Garden Town.</p> <p>Since March 2020, the English planning and development industry - and local authorities in particular – have had to adjust to working differently and remotely, and having resources diverted to deal with the consequences of the pandemic and national lockdown(s). It is somewhat of a surprise therefore, given the Council's recently adopted Local Development Scheme, that West Berkshire Council has managed to do all the requisite evidence gathering and research to be able to publish such a detailed Regulation 18 document so quickly on Friday 11 December 2020, after more than nine months of disruption. This timeline would suggest publication of the plan was rushed.</p> <p>It is also considered to be unusual that this Regulation 18 document was not considered at any form of public committee or through any other statutory oversight process before publication. In contrast, the West Berks Minerals and Waste Reg 19 Local Plan went to Full Council on 3 December 2020 and officers sought delegated authority to publish that plan for consultation. The vast majority of the Mineral and Waste Plan had already been seen by Full Council and had been out for public consultation before. The report to Full Council on 3 December 2020 merely presented the main changes to the plan, mostly as a result of one site being withdrawn. This is nowhere near as significant as providing the new spatial strategy for development up to 2037 – including 8,114 new homes – as well as policies for employment, retail and leisure uses; infrastructure, flood risk and community facilities; and policies for the conservation and enhancement of the natural, built, and historic environment and planning measures to address climate change mitigation and adaptation. We fail to understand how such a detailed local development plan was not subject to a similar process as the Mineral and Waste Plan.</p> <p>To add to the premise that this plan was rushed to publication without an oversight process by Members, it is understood that the Council may be taking another version of the local plan to Full Council later this spring/summer (prior to the Reg 19 version) which would be outside the adopted LDS programme. We wonder whether this is possibly to regulate the preparation process.</p> <p>The High Court challenge hearings to the extension of the DEPZ around Burghfield AWE started on 15 December just one working day after the local plan was published. Publishing the draft plan late on a Friday evening after significant disruption, without it going to Full Council for consideration and authorisation to publish, one working day before the High Court hearings and a week and a half before offices closed for Christmas, feels rushed and cannot be seen to be best practice.</p>	<p><i>nature of our consultation will depend on the nature of the document being produced and the ways in which we involve the community will depend on the stage we are at in the preparation of that document.'</i></p> <p>The sites included as part of the proposal for Grazeley were located in the administrative areas of Reading, Wokingham and West Berkshire with the majority of the site located Wokingham. Though Grazeley had been identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation. No strategic allocation will therefore be made in this area.</p>

Respondent	Response	Council Response
	<p><b>Duty to Cooperate</b>  Paragraph 1.23 of the draft Local Plan states:  <i>“The LPR is being produced through close partnership working with our neighbouring local authorities to ensure that cross-boundary issues are being taken into account. Key work on satisfying the Duty takes place on an ongoing basis. The Council will prepare a Duty to Cooperate Statement to accompany the LPR and which will set out in detail how we cooperate on strategic cross-boundary issues in order to create and deliver a positively prepared plan.”</i></p> <p>It is concerning given cross boundary issues that are inherent to the consideration of the plan and its evidence base that the Council has pushed this document into a future phase of plan preparation, particularly given paragraph 26 of the NPPF which states:  “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is <b>integral to the production of a positively prepared and justified strategy</b>. In particular, <b>joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.</b>” (Authors emphasis).</p> <p>The Local Plan should be ambitious and plan for the appropriate level of growth to ensure that existing and future communities thrive. This draft Local Plan therefore needs to consider not just West Berkshire’s own development needs but that of its neighbours and the wider spatial area (see Section 4 below) as it did working jointly with Wokingham Borough Council, Reading Borough Council and Bracknell Forest Borough Council to produce the West of Berkshire Spatial Planning Framework in December 2016 and subsequent additional studies. The Framework was intended to guide the four Western Berkshire authorities in pulling together their local plans by identifying some key opportunities for major delivery of new development, particularly for housing and the level of infrastructure provision required.</p> <p>The Local Plan also needs to consider the implications of any neighbouring authority’s local plan allocations and consider any impacts or opportunities this may bring, including planning for social and community infrastructure, such as the proposed new settlement at Grazeley immediately adjoining the boundary of Wokingham Borough (Policy SS3 in the Wokingham Borough council Draft Local Plan, February-March 2020).</p> <p>Paragraph 6.22 of this Reg 18 Local Plan states, <i>“Though Grazeley has been identified as a possible location for a new garden settlement, there are uncertainties regarding the proximity to AWE Burghfield, funding for infrastructure and delivery timescales. No strategic allocation is therefore made in this spatial area.”</i> However, this draft plan effectively then ignores the major proposal on its boundary. By ignoring the</p>	

Respondent	Response	Council Response
	<p>proposal of a new garden community at Grazeley in this Local Plan and moving away from previous commitments and ambitions to develop the Council's own land to the south of Grazeley, as an integral part of the garden community, this draft plan will fail the soundness tests of being positively prepared and having a justified long-term strategy for the development needs of its district or the wider area.</p> <p>West Berkshire has been a joint partner in the Grazeley garden town project since the preparation of the West of Berkshire Spatial Planning Framework. However, the Council seems to have backed away from this joint work and the evidence that supported the garden community, despite being part of the group of authorities that submitted a bid and received funding to pursue this long-term proposal in 2019.</p> <p>This is a significant step back given the forward-thinking nature of this collaboration and the time, resources and expenditure applied in the last five years by all local authorities involved; something which demonstrated a good example of strategic planning as considered in the recent White Paper, "Planning for the Future" (paragraph 2.19).</p>	
Carter Planning for RLA Jones (lpr1899)	<p>Para 1.23 We understand the legal duty to co-operate and are sure that this will be carried out, but it is unfortunate that no details of the co-operation to date are given at this stage. This would have been helpful and would have informed the Draft Plan, and the responses to it, if details could have been given.</p> <p>This is especially true on the subject of housing as the Plan deals with the Council's housing need but does not explain whether or not adjoining Authorities (such as Reading, Swindon and Wokingham) will require housing need to be met in West Berkshire District and if so what the quantum of that additional housing would be.</p> <p>The Draft Plan sets out a figure for overall housing need together with some sites but it may be that both of those aspects will need to be revisited in the light of the duty to co-operate.</p> <p>Give details of the responses to the duty to co-operate as soon as possible so that the overall housing requirement figure and the sites needed to meet it can be addressed.</p>	<p>Comments noted.</p> <p>A Duty to Cooperate Statement will be published alongside the Proposed Submission LPR.</p>
Rural Solutions for Karine Giannamore (lpr2306)	<p>As a general observation, we suggest that this and the following sections should be referred to as 'Development Management' Policies in line with the NPPF. The term 'Development Control' implies restrictive policies and negativity, whereas our experience indicates the Council wishes to be proactive in shaping development proposals in their area.</p>	<p>Comments noted.</p> <p>References throughout the document will be changed from DC to DM</p>
Savills for Englefield Estate (lpr1545)	<p>The LPR is supported by a number of evidence studies including the HELAA and other supporting evidence studies which are referenced above where relevant. The HELAA</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>(December 2020) has been updated to take account of factual inaccuracies in the earlier February 2020 publication. This includes updated assessments of several sites owned by the Estate following submission of additional clarification on 20th March 2020. In response to the updated assessment we would comment as follows:</p> <ul style="list-style-type: none"> <li>BRAD4: Land at Cock Lane, Bradfield Southend – the HELAA assessment has been updated to state, <i>'The site is in use as a temporary allotment (the site comprises garden land that is let by the landowner under license to one private individual).'</i> However the assessment concludes that the suitability of the site is <i>'unknown'</i> because <i>'the promoter has not indicated if these will be reprovided for elsewhere.'</i> The updated HELAA partly acknowledges our response of 20th March 2020 (in which we noted that the site is used as an extension to the garden of the adjoining property, Southend House, rather than as an allotment) and acknowledges that temporary allotments are not protected from disposal and do not constitute green infrastructure. On this basis, there is no justification in planning policy terms for re-provision to be required. The HELAA assessment should be updated accordingly to conclude that the site is <i>'suitable'</i> for</li> <li>BUR12: Land at Green Park, Kirton's Farm Road, Reading, and BUR13: Land west of Green Park Station, off Cottage Lane, Reading – the HELAA assessment has been updated to state that whilst each site <i>'lies adjacent to a 'Major Development Location' and 'Core Employment Area' at Green Park...the surrounding area of the site in West Berkshire is rural and the site does not relate physically or visually to an existing built up area'</i> (our emphasis). As set out in our response of 20th March 2020, it is misleading and wholly inaccurate to describe the sites' context as <i>'rural'</i> given the surrounding transport and utilities infrastructure (e.g. Green Park Station, M4 and substation) and planned development at Green The NPPF (paragraphs 24, 35, 102 and 106) clearly encourages effective strategic planning across authority boundaries and development around transport interchanges and therefore it is critical that the site is considered in its overall context.</li> </ul> <p>Development opportunities - In the context of the above, the Estate's landholdings within the District provide an opportunity for appropriate development to contribute towards the aims and objectives of the LPR.</p> <p><b>Grazeley</b> The Englefield Estate are one of the key landowners of land identified as a potential new settlement at Grazeley (ref. WOK4). As outline in the previous LPR Regulation 18</p>	<p>The specific comments that relate to sites being promoted as part of the HELAA will be dealt with as part of that process.</p> <p>The Council's strategy is to direct development to the most sustainable locations in accordance with the settlement hierarchy. Within these settlements, policy SP13-15 identify the sites that are considered suitable in relation to the hierarchy taking into account the assessment of sites carried out through the HELAA.</p> <p>The sites included as part of the proposal for Grazeley were located in the administrative areas of Reading, Wokingham and West Berkshire with the majority of the site located in Wokingham. Though Grazeley had been identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation. No strategic allocation will therefore be made in this area.</p>



Respondent	Response	Council Response
	<p>consultation, this strategic development opportunity has the potential to deliver a major housing and mixed use development of 15,000 dwellings, including 5,000 dwellings in West Berkshire district. Given the significant benefits that this strategic site could bring to the housing and development needs of the area, should the DEPZ change (noted at LPR paragraph 4.47), a review of the LPR should be undertaken to reconsider development at Grazeley. In the meantime, the LPR should continue to note the potential future opportunity at Grazeley and the on-going cross-boundary work that is being undertaken to support its allocation in future.</p> <p><u>Englefield</u> Englefield village comprises a sustainable rural community within the district with a range of local community services and facilities. The current local planning policies that apply to the village are restrictive of development and this is reflected in the amount of new development that the village has experienced in recent years. As such there is very little inward migration of new families to the village and, together with a lack of employment opportunities, the resultant trend is towards an ageing population. This threatens the medium to long term economic and social viability of the village and its community, in particular the survival of core services. It is however considered that, together with updates to draft LPR policies above, opportunities exist within the village (e.g. HELAA site refs. ENG1, ENG2 and ENG3) to ensure that it remains a diverse, vibrant and rural community with a mix of housing, employment and education which sustains the community and contributes to meeting the needs identified in the LPR.</p> <p><u>Bradfield Southend</u> The Estate's landholdings at Cock Lane, Bradfield Southern (ref. BRAD4) is situated within the existing settlement boundary of Bradfield Southend, and is less than 5 minutes' walk from all the services and facilities within the village (including educational, retail and community facilities). The site is located within the North Wessex Downs AONB, which washes over the entirety of the settlement, however in all other respects, the site is not constrained environmentally. The site is therefore situated in a sustainable location could accommodate in the region of 4-5 dwellings to meet local needs. As noted above, a change to the HELAA assessment is required to reflect the absence of allotments (and therefore lack of justification for their reprovision) and to conclude the site is 'suitable' for development.</p> <p><u>Burghfield Common</u> In addition to the Estate's site at Pondhouse Farm, Burghfield Common (referred to above), the Estate's landholdings at Burghfield Common include land adjacent to Pondhouse Farm and land at Hollybush Lane, Burghfield Common. Taking into account the role of Burghfield</p>	

Respondent	Response	Council Response
	<p>Common within the district, and given that the DEPZ may be subject to change (as noted above), it is recommended that some provision is made for additional housing at Burghfield in order to ensure certainty of future housing supply.</p> <p>The site adjacent to Pondhouse Farm adjoins the eastern edge of Burghfield Common and is within walking distance of all the services and facilities within the village (including educational, retail and community facilities). The site is currently in agricultural use and is not constrained environmentally e.g. by ecological or landscape designations, or by flood risk considerations. The site is therefore situated in a sustainable location to accommodate development in the region of 100-140 dwellings.</p> <p>The site at Hollybush Lane adjoins the northern edge of the Burghfield Common settlement boundary. The site is a c10 minute walk to educational, retail and community facilities and 1 mile away from the village centre. The site is recognised as having opportunities for biodiversity enhancements through its designation as a 'Biodiversity Opportunity Area', however in all other respects, the site is not constrained environmentally e.g. by landscape designations or flood risk considerations. The site, or part thereof, is therefore situated in a sustainable location to accommodate development.</p> <p><u>Mortimer</u></p> <p>In addition to land at West End Road (ref. SM2) and The Street (ref. SM3) (promoted by others), the Estate has landholdings at Spring Lane (ref. SM4) and Monkton Copse, Mortimer (ref. SM5). Mortimer is located just outside the DEPZ in the Eastern Area and has potential to accommodate additional development within the LPR plan period to 2037 (beyond the existing Neighbourhood Plan period).</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Context

### (Proposed Submission LPR reference: Context)

Number of responses received: 16

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr703)	Supports the approach	Support for the approach is noted.
Public Protection Partnership (lpr11)	Supports the approach	Support for the approach is noted.
<b>Statutory consultees</b>		
Cold Ash Parish Council (lpr1727)	<p>The West Berkshire District Council Local Plan clearly represents a significant amount of work and provides a comprehensive response to the key issues of the day, both national/international and local. Few could be in disagreement with its aims however the challenge faced is how to achieve them in a balanced way.</p> <p>The recognition of the value of protecting and enhancing the character of the varying landscapes across the district, and recognising and maintaining the distinctness of individual areas, is extremely positive. Much of West Berkshire is made up of towns, villages and local areas, whose distinctiveness and local character are very important.</p> <p>The main concern around the plan is that the aims have not been met for significant areas of the district, due to a number of constraints; both those placed on West Berkshire District Council and those it has chosen to adopt.</p>	<p>Comments noted.</p> <p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy; and is based on robust up-to-date evidence.</p>

Respondent (with lpr ref)	Response	Council Response
Greenham Parish Council (lpr870)	<p>2.6 states “West Berkshire is well connected in transport terms”. This is true of most of the district, however not true of Thatcham, which leads us to question the decision to allocate so many more houses in NE Thatcham. Traffic to and from the main road network (M4 / A34) has to pass through Newbury and this adds to congestion. There is a need for a road link – especially for HGVs – from the east of Thatcham railway station (by bridge over road and canal /river) from A4 to A339 Thornton Road, via New Greenham Park. This could continue between the Swan roundabout south of the River Enborne to link with Newbury bypass at Wash Water. From this road link, if Sandleford Park (SP 16) is to avoid further congesting both the A339 through Newbury and A343 through Wash Common with traffic that need not use those roads, a local link into Sandleford from the south could be made.</p> <p>We would like the District Council to consider asking for a grant from the Local Enterprise Partnership which together with CIL contributions from the two strategic housing sites in this Local Plan (Sandleford and NE Thatcham SP 17) could largely pay for this, topped up from the general CIL pot.</p>	<p>Comments noted.</p> <p>Paragraph 2.6 of the Emerging Draft LPR provides an overview of the District as a whole. It is acknowledged that some parts of the area will have better access to the rail and strategic road network than others.</p> <p>The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review and some of the issues raised are more appropriately considered as part of that process. Other detailed comments will be dealt with as part of the Council’s response to comments made under Policy SP17.</p>
Hungerford Town Council (lpr119)	<p>Supports the approach. The North Wesssex Downs is rightly highlighted as a very important feature of the West Berkshire District.</p>	<p>Support for the approach noted.</p>
Newbury Town Council (lpr2274)	<p>Para 2.6 states “West Berkshire is well connected in transport terms”. This is true of most of the district, however not true of Thatcham, which leads us to question the decision to allocate so many more houses in NE Thatcham. Traffic to and from the main road network (M4 / A34) has to pass through Newbury and this adds to There is a need for a road link – especially for HGVs – from the east of Thatcham railway station (by bridge over road and canal /river) from A4 to A339, via New Greenham Park. This could continue between the Swan roundabout south of the River Enborne to link with Newbury bypass at Wash Water.</p>	<p>Comments noted.</p> <p>Paragraph 2.6 of the Emerging Draft LPR provides an overview of the District as a whole. It is acknowledged that some parts of the area will have better access to the rail and strategic road network than others.</p> <p>The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review and some of the issues raised are more appropriately considered as part of that process. Other detailed comments will be dealt with as part of the Council’s response to comments made under policy SP17.</p>

Respondent (with lpr ref)	Response	Council Response
Shaw cum Donnington Parish Council (lpr192)	Context Shaping - No comment.	Response noted.
Thatcham Town Council (lpr1381)	<p><b>Section 2.1</b> "AONB ... legally protected landscape" It is our understanding that, for AONB regions, separate policies apply instead of the presumption in favour of granting permission. Where management plans exist, development in the setting of AONB are matters for decision makers. Given that 74% of West Berkshire is AONB it is important that the proper consideration is given, and the area as a whole should not be dismissed as being unavailable for development. This statement should describe the meaning of "legally protected" in context and explain that this does not mean that development is prohibited.</p> <p><b>Section 2.4</b> "The rural environment of West Berkshire adds significantly to the quality of life enjoyed by urban residents of the District and is a considerable asset for the area." We recognise that the rural environment of West Berkshire is a valuable and precious asset. Nevertheless, the rural environment only adds to the quality of life for residents of urban areas if it easily accessible. It is essential that rights-of-way that connect urban conurbations to the surrounding countryside are maintained and strengthened to maintain quality of life, well-being and health.</p> <p><b>Section 2.5</b> "the current economic uncertainty which both COVID-19 and Brexit ... rates of employment in the District are high". We agree that there is a great deal of economic uncertainty and are concerned that committing to a Local Plan during this period is appropriate. We note that West Berkshire contains a large number of employers, including major business and SME's, with a European focus. The largest business sector in 2019 is stated as being Professional, Scientific and Technical Businesses. We would encourage WBC to conduct primary research with a range of European facing companies to understand the extent of growth, or contraction that is anticipated post-Brexit.</p>	<p>Comments noted.</p> <p>This section is an introduction only. Further detail on the AONB is given in Policy SP2 which clearly sets out the Council's approach to the nationally designated landscape.</p> <p>The Council agrees that access to the countryside is important. Rights of Way will be maintained and strengthened through the Local Plan Review and this is set out in Policy SP10.</p> <p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic.</p> <p>Paragraph 2.6 of the Emerging Draft LPR provides an overview of the District as a whole. It is acknowledged that some parts of the area will have better access to the rail and strategic road network than others.</p> <p>The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review and some of the issues raised are more appropriately considered as part of that process.</p> <p>Other detailed comments will be dealt with as part of the Council's response to comments made under Policy SP17.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>We note that in the Evidence Base the employment assessment states that "Covid19 ... the impact on the current economy and future economic growth will need to be assessed' and 'it is not possible to capture the impact ... in this report'. Given that the employment distribution, and economic development, are critical inputs to the policy and strategic direction for West Berkshire we struggle to understand how major developments can be proposed based on what may be dated mobility patterns and traffic flow. It is necessary for West Berkshire to test the robustness of its assumptions through engagement with local businesses.</p> <p><b>Section 2.6</b> "well connected in transport terms. At the centre of the District is an important road interchange"</p> <p>This is a statement that is true of West Berkshire in general, but not at a local level. We recognise that the mainline railway service is an important asset, particularly with regards sustainable travel and the desire to reduce private vehicle use. Nevertheless, the position remains that Thatcham is poorly connected to its station. Its location, access, and parking are sub-standard for a population centre of the size of Thatcham. The crossing creates significant congestion, with queues approaching 1km in length, and the crossing being closed for up to 40 minutes in an hour. In effect this means that Thatcham is poorly connected to the centres to the South. This information has previously been released by West Berkshire into the public domain.</p> <p>Recently, Thatcham Town Council has made enquiries with GWR as to whether the scheduling at the rail crossing can be improved. In the most recent feedback (19th Jan 2020) our request to relocate trip points to reduce closure duration was rejected. There will be no changes to the Colthrop signal box until at least the period 2029-2034. Therefore, there does not appear to be any credible option to reduce crossing closures.</p> <p>It is essential that there is a full disclosure of the traffic queuing, crossing closure rate, and period of closure, in the evidence pack related to traffic assessment. The time period should represent pre-Covid data to align with other evidence.</p> <p>Further, access from Thatcham to the North is primarily through the rat-run route of Cold Ash, Hermitage and Chieveley to access the A34.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>In effect this means that Thatcham is served with one primary East-West route. There are several fundamental issues with the A4 approaching, and through, Thatcham:</p> <ol style="list-style-type: none"> <li>1. The route is over-stretched - it serves as a route for 'active-travel' with the introduction of cycle lanes; it is a main route for HGV traffic to the distribution centres to the East of Thatcham; it is a main access route for 'blue-light' services for A&amp;E hospitals at Reading and Basingstoke (via Brimpton); it is a trunk-road and diversion route for M4 traffic; and it remains the essential route to serve local residents to enable access to the Town Centre. Consequently, the A4 within Thatcham, and its access from both the East and West routes, are often congested during peak periods.</li> <li>2. The A4 road is narrow in width and contains many junctions in a short stretch through the town centre. There are recently introduced active travel measure measures for cycling but these are already being called into question due to vehicles colliding with the cycle lane borders ('Orcas' and poles). It remains unclear to the long-term viability of these measures when traffic flows increase to pre-Covid levels.</li> </ol> <p>The alternative routes to the A4 all involve transiting through residential areas on roads that are not dimensioned for supporting high traffic flow or HGV (e.g. Lower Way to the South, or Bowling Green Road to the North). Therefore, we accept that whilst West Berkshire as whole may be well-connected, we disagree that the proposed site for NE Thatcham is well-connected.</p> <p>It is therefore necessary to clarify the statement to describe that within West Berkshire there are areas that are not well connected and specifically this includes the strategic site proposed for NE Thatcham under policy SP 17 due to constraints on infrastructure.</p>	
Environment Agency (lpr1656)	2.1 – Add: The Rivers Lambourn and Kennet are nationally important chalk rivers, while the former is also internationally important, as are a number of wetland habitats along the Kennet corridor.	Comments noted. Add the following to the end of paragraph 2.1 – <u>'The valleys of the internationally and nationally important chalk rivers of the Lambourn and Kennet also form two distinctive landscapes threading through the District.'</u>
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
West Berkshire Green Party (lpr1822)	<p>The Emerging Draft is based on evidence that largely predates the current pandemic, Brexit and Brexit-related legislation on agriculture and the environment, declaration of a climate emergency by the council, and the government's plans to change the entire planning system.</p> <p>We believe that these factors will have a major impact on planning issues. For example, Covid-19 will lead to big changes in the way people work, whether or not they commute, where they shop, and so on. The collapse in the retail sector at the expense of online shopping will have major implications for town centres – including an opportunity for more homes in town centres, with a corresponding reduction in the need to build on greenfield sites.</p> <p>There is therefore a danger that the Local Plan will be out of date as soon as it is published. The Green Party believes it is vital that these various factors be taken into account when drawing up the Local Plan, and we strongly urge that where necessary up-to-date evidence is gathered and incorporated into it, even if this leads to a delay. We also propose an interim review of the newly adopted plan after a year or two when the impact of these factors will be easier to assess.</p>	<p>Comments noted.</p> <p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic.</p> <p>In line with the NPPF, the policies in the plan will be reviewed to assess whether they need updating at least once every five years and will then be updated as necessary.</p>
West Berkshire Heritage Forum (lpr106)	Supports the approach.	Support for the approach is noted.
<b>Other stakeholders</b>		
Sam Coppinger (lpr277)	<p>We agree that the rural nature of West Berkshire should be paramount in considering new developments and fundamentally that the AONB needs to be preserved.</p> <p>We agree that West Berkshire benefits from really good road connections, however, we would like to bring to your attention that not all rural communities are well served by public transport.</p>	<p>Comments noted.</p> <p>It is recognised that many rural parts of the District have no, or a very minimal bus service. The Council has recently published a Bus Service Improvement Plan, which outlines that Demand Responsive Transport options are being investigated for rural areas where there are no bus services (e.g. between Hungerford and Lambourn).</p>
Councillor Alan Macro (lpr750)	It is true that West Berkshire has several major arteries running through it, but it cannot be said that it is "well connected". Both national (M4 and A34) and local highway networks are overloaded and congested at peak times.	<p>Comments noted.</p> <p>This introductory section has taken a strategic look at the District. The Council will be undertaking a review of its</p>



Respondent (with lpr ref)	Response	Council Response
	This affects roads in and around Newbury, Thatcham and Theale in particular. The section should be re-worded to reflect the problems.	Local Transport Plan following the Local Plan Review and the issues raised will be considered as part of that process.
Paula Saunderson (lpr45)	<p>The AONB, whilst a designation comprises of much intensively farmed agricultural land, and as such is very low in Biodiversity. Many of your villages have become mini dormitories for the affluent with very little of their original feel about them. There seems to be no encouragement of these large landowners to place Green Energy generation schemes on their lands.</p> <p>I am not sure you have a full handle on your Housing Stock, and what types and size of housing is over-supplied and what is under-supplied</p>	<p>Comments noted.</p> <p>The primary purpose of AONB designation, ‘to conserve and enhance the natural beauty of the area’, is set out in the Countryside and Rights of Way Act 2000. Under Section 85 of the Act, the Council has a duty to have regard to the primary purpose of designation and Policy SP2 makes clear that the North Wessex Downs will have appropriate sustainable growth throughout the plan period to support its local communities and rural economy in a manner commensurate with its statutory status.</p> <p>Local housing needs within the AONB will be met through the affordable housing and exception site policies. New homes will be expected to comply with Local Plan Review policies regarding renewable energy and carbon.</p>
Councillor Tony Vickers (lpr523)	<p>2.6 states “West Berkshire is well connected in transport terms”. It is true that West Berkshire has several major arteries running through it, but it cannot be said that it is “well connected” if these are frequently congested. Both national (M4 and A34) and local highway networks are overloaded and congested at peak times. This affects roads in and around Newbury, Thatcham and Theale in particular.</p> <p>The infrastructure delivery plan should be developed to address problems identified in the model and incorporated in the draft new local plan. The revised draft, incorporating the above, should then be consulted upon. Traffic to and from the main road network (M4 / A34) has to pass through Newbury or Theale along the A4 – or ‘rat run’ through Cold Ash. This adds to congestion, limits opportunities for local active travel. There is a need for a road link south of Newbury – especially for HGVs – between Colthrop and the A34 at Wash Water, via New Greenham Park and A339. This could also help alleviate problems from increased through traffic from Manydown (NE of Basingstoke) through A339 in the centre of Newbury.</p> <p>The sentence in 2.6 should be changed to “<b>Most of</b> West Berkshire is well connected in transport terms.”</p>	<p>Comments noted.</p> <p>This introductory section has taken a strategic look at the District. Paragraph 2.6 of the Emerging Draft LPR provides an overview of the District as a whole. It is acknowledged that some parts of the area will have better access to the rail and strategic road network than others.</p> <p>The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review and the issues raised will be considered as part of that process.</p>

Respondent (with lpr ref)	Response	Council Response
	We also propose a change in Section 4 (Newbury and Thatcham Area).	
<b>Landowners, site promoters and developers</b>		
Rural Solutions for Karine Giannamore (lpr2310)	<p>About 90% of West Berkshire is rural in character. The North Wessex Downs Area of Outstanding Natural Beauty (AONB) is a protected landscape, covering approximately 74% of West Berkshire.</p> <p><i>“This rural dimension is very important in shaping the character of West Berkshire, its communities, economy and environment. The importance of agriculture and rural businesses, the prominence of landscape and countryside along with the small scale and dispersed nature of rural communities, are all important issues and challenges to be considered through the review of the Local Plan. The rural environment of West Berkshire adds significantly to the quality of life enjoyed by urban residents of the District and is a considerable asset for the area.”</i></p> <p>Whilst the above is very true, the rural environment is a working landscape, and its local communities require sustainable growth to keep these essential services going. This has become more apparent during the Covid-19 pandemic where people have become much more reliant on local services and facilities within their hamlet or surrounding villages, which between them often support each other.</p> <p>For example, Hamstead Marshall includes the local church, a pub and village hall, whereas the next village Crockham Heath contains the local primary school (Enborne CE Primary) serving a wider cluster of hamlets. Whilst the rural area provides an asset for urban residents, we must not forget those living within these important communities. To indicate that these areas will see no growth at all during the plan period could have long-term negative consequences for the sustainability of these settlements.</p> <p>The concept of a ‘place-based approach’ is good, but this should go further to support the growth of West Berkshire’s rural communities. It focuses on the urban settlements for growth such as Newbury/Thatcham and the eastern areas but more emphasis is needed on the smaller spatial scale. There are important roles and interrelationships which the rural hinterlands play to the benefit of the urban centres and more generally to the wider area.</p>	<p>Comments noted. The issues raised are considered as part of the Council’s response to comments made under Policy SP1.</p> <p>Policies SP20 and DM39 of the Emerging Draft LPR will support the ongoing vitality of rural communities and community facilities.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR reference: Our Vision****(Proposed Submission LPR reference: Our Vision)**

Number of responses received: 28

<b>Respondent</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr705)	Support for the Vision.	Support noted
Public Protection Partnership (lpr12)	Support for the Vision.	Support noted
<b>Statutory consultees</b>		
Cold Ash Parish Council (lpr1728)	<p>Vision neither supported nor not supported.</p> <p>The vision is somewhat prosaic, which is understandable to an extent given the Plan's nature, but a significant omission is the lack of reference to quality of life for residents. How is the Plan genuinely going to enhance this? How are residents going to feel about living in West Berkshire within 5 years, half-way through, and at the end of the Plan?</p>	<p>Comments noted. The Vision is deliberately concise. The common components of quality of life run through the Vision in seeking to satisfy the needs of current and future residents as well as attract and retain employers, workers, and visitors. Development of the physical environment in the form of housing, employment land and infrastructure within a cleaner more sustainable outlook for residents is connected directly to community cohesion, health and social wellbeing. The extent to which the Local Plan can be linked further productivity, satisfaction, and happiness (and thus how people feel) in any measureable way is considered beyond the scope of the Vision.</p>

Respondent	Response	Council Response
Greenham Parish Council (lpr874)	<p>Vision is supported.</p> <p>We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new development will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retro-fit for sustainability in use than is possible with new development.</p> <p>The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan if necessary, at the expense of economic and even social sustainability. However nothing could be more likely to fail to secure social and economic sustainability than failure to tackle climate change, because all the evidence (e.g. The Stern Report of 2006) indicates that the costs of doing so overall and in the long term will increase unless measures are taken early.</p> <p>Therefore our approach to achieving this aspect of the Council's Vision will be to consistently give much greater weight to a development's contribution to mitigation of climate change than to being in keeping with the character and distinctiveness of the area. This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning and in the landscape of rural areas of greater impact than in recent decades.</p> <p>Over the Plan period, even if all new homes are built to zero carbon standards, there will by 2037 be only a small reduction in the overall carbon footprint of the District. New build in any one year seldom accounts for more than 1% of total built stock. We should be insisting on the highest standards in all new builds and encouraging the opportunity to upgrade and replace poorly insulated and badly maintained buildings, in addition to permitting new build. Whatever can be done through the planning system by amending this Local Plan should be done, in the interests of sustainability. Our Vision is for West Berkshire to set the national benchmark standard for green prosperity for all.</p>	Comments noted.
Hungerford Town Council (lpr54)	Vision is supported.	Comments noted.

Respondent	Response	Council Response
	<p>Strongly support 3.3 in particular as we need to accelerate progress on delivering real carbon neutrality for the District as a whole primarily by eliminating direct carbon emissions from residential and commercial buildings and transport rather than relying on off-setting. Local employment opportunities (3.1) particularly in technology and creative businesses are well suited to the area. In our area of relatively high residential prices 3.2 remains a key part of the required vision</p>	
<p>Newbury Town Council (lpr2273)</p>	<p>Vision is supported.</p> <p>We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new developments will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retrofit for sustainability than is possible with new developments. The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan – if necessary, at the expense of economic and even social sustainability. However, nothing could be more likely to fail to secure social and economic sustainability than failure to tackle climate change, because all the evidence (e.g. The Stern Report of 2006) indicates that the costs of doing so overall and in the long term will increase unless measures are taken early.</p> <p>Therefore, our approach to achieving this aspect of the Council's Vision will be to consistently give much greater weight to a development's contribution to mitigation of climate change than to being "in keeping with the character and distinctiveness of the area". This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning, and in the landscape of rural areas, of greater impact than in recent decades.</p> <ul style="list-style-type: none"> <li>• Absolute priority being given to tackling Climate</li> </ul> <p>Over the Plan period, even if all new homes are built to zero carbon standards, there will by 2037 be only a small reduction in the overall carbon footprint of the District. New builds in any one year seldom accounts for more than 1% of total built stock.</p>	<p>The support is noted.</p> <p>The comments on climate change are noted. The LPR seeks to go as far as it is believed we can within the current legislation and the planning system. This is set out in further detail in Policies SP5 and DM3 of the Emerging Draft LPR.</p>

Respondent	Response	Council Response
	<p>That does not mean it is not worth insisting on the highest standards in all new builds, but it does mean that every opportunity to encourage upgrading or replacing poorly insulated and badly maintained buildings (especially homes or buildings that could be homes) must be taken, in addition to permitting new builds.</p> <p>Whatever can be done through the planning system by amending this Local Plan should be done, in the interests of sustainability. Our Vision is for West Berkshire to set the national benchmark standard for 'green prosperity for all', beginning with its own land at Newbury's London Road Industrial Estate as an exemplar carbon positive mixed development and matched by a new urban quarter in the Kennet Centre.</p>	
Shaw cum Donnington Parish Council (lpr193)	<p>Support for the Vision: This section states that developments should be of a high quality design. Experience of recent developments show that large developments are of identikit dwellings and pay marginal if any respect to the local area. Dwellings tend to be smaller with very small if minimal amenity/garden areas. They are built to minimum building regulations particularly with respect to energy efficiency. This is disappointing. They are advertised as exciting executive opportunities and that may well be against the trade descriptions act. We support the aims of this section and hope that these can be met in the light of developer's determination to maximise profits and pay little respect to the aims of this section.</p>	<p>Comments noted.</p> <p>The Local Plan Review includes extensive policies to meet a range of requirements in urban and rural settings in terms of purpose and sustainable design, the mix of dwellings types, their location and affordability. Support is noted as is the caveat of the need for determined and effective implementation of policy to achieve the Vision.</p>
Stratfield Mortimer Parish Council (lpr387)	<p>Vision is not supported.</p> <p>Para 3.2 From our experience with the neighbourhood plan, the type of housing, such as bungalows, is a very important aspect of any plan if it is to achieve buy-in from the local community.</p> <p>Para 3.3 While the main thrust of the proposal is very much supported, the wording is not clear and is largely contradictory. For instance, what does delivering carbon neutrality really mean and is this just for WBC as a body or West Berkshire as an area? If the latter, then a great deal more than is outlined in this plan will have to be done to achieve it.</p> <p>Later in this clause the objective is thrown away by using statements such as reducing carbon footprint which is a very much lesser goal than achieving carbon neutrality.</p>	<p>Comments on Para 3.2 are noted. The plan does not exclude bungalows. Carbon neutrality is a common term referring to the balance of carbon emissions and carbon absorption. The continuation of carbon emissions is a fact. Reference to carbon footprint relates to embracing new technologies within development over the next 15 years to drive down emissions on its own merits alongside absorption measures in, for instance, green infrastructure amongst others. The Vision states that the Plan will "contribute" to carbon neutrality in recognition that the Plan alone will not achieve it by 2030.</p>

Respondent	Response	Council Response
	<p>This clause needs to be re-written to be quite specific about what is to be achieved and the words need to be consistent throughout.</p>	
<p>Thatcham Town Council (lpr1383)</p>	<p>Section 3.1 "Making available housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs." We recognise that there are different pressures across West Berkshire. It is important that villages remain viable, and that primary schools, community hubs, shops and local pubs are sustainable. It is also important that due consideration is given to transport assets such as the electric rail line to encourage sustainable travel. We recognise the importance of the M4/A34 interchange as made clear in the Economic Assessment where it is noted that local agents regard that for industrial development "the best location would be between Newbury and the M4/A34 bypass". This is likely to drive the location of future employment centres. Taken together, there are different pressures across West Berkshire that justify the meaning of a sustainable location. Housing could be located in either villages, or close to employment centres, or close to rail stations, with equal justification that they are sustainable. It is necessary that the Local Plan does not give dominance to one location, because in doing so it undermines the sustainability of other locations and may lead to greater distances to travel to work or weaken the viability of rural villages with ageing populations.</p> <p>Section 3.3 "Development and infrastructure will be sustainable, contributing to our aim to deliver carbon neutral by 2030". We support this mission. We note that the referenced Environment Strategy states "that carbon dioxide will be reduced to a net zero level. In other words, any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented." We draw attention to the Building Homes Standard, recently published by central government that local authorities will retain powers to set local energy efficiency standards for new homes. Therefore, we recommend that West Berkshire has an independent assessor or carbon footprints for major new developments. Where development exceeds net zero carbon beyond 2030 a developer should demonstrate how offsetting will be used to mitigate carbon emissions. We recommend that consideration is given to approaches such</p>	<p>Comments noted. The Council's strategy is to direct development to the most sustainable locations in accordance with the settlement hierarchy. Policies SP13-15 identify the sites that are considered suitable in relation to the hierarchy taking into account the assessment of sites carried out through the HELAA. The comment saying that there is a dominance of one location is not accepted.</p> <p>The comments on climate change and zero carbon or carbon neutrality are noted. The LPR seeks to go as far as it is believed we can within the current legislation and the planning system. This is set out in further detail in Policies SP5 and DM3 of the Emerging Draft LPR.</p> <p>More detailed comments about the NE Thatcham allocation and it's relationship to the countryside and AONB will be dealt with as part of the Council's response under Policy SP17.</p>

Respondent	Response	Council Response
	<p>as the London Authority in which development that fail to meet net-zero carbon result in a financial contribution being delivered to the Authority to support carbon offsetting.</p> <p>Section 3.4 "there will be greater opportunity for enjoyment and appreciation of the special qualities of the built and natural environment." The proposed NE Thatcham development would subsume existing right-of-ways, and if it were to proceed would require residents to walk through a large housing estate to access the AONB to the North. This is in conflict with the statement that it will provide greater opportunity to appreciate the natural environment. It is essential that rights-of-way from urban areas to neighbouring countryside are not compromised.</p>	
Reading Borough Council (lpr1485)	RBC supports the vision to achieve growth that is sustainable and contributes to aims to be carbon neutral by 2030. Housing developed within West Berkshire close to Reading's boundary is likely to rely on Reading for services and facilities. As such, it is vital that these sites are supported by adequate infrastructure. Development should make adequate provision towards local infrastructure through the Community Infrastructure Levy (CIL) and Section 106 payments, which may include the funding and provision of infrastructure within Reading, and RBC considers it essential to agree a protocol between the two authorities to cover this.	The comments supporting the approach are noted and the further representation in relation to infrastructure is also noted.
<b>General consultation bodies</b>		
Heritage Forum (lpr64)	<p>Support for the Vision:</p> <p>Given the rural nature of the AONB, there should be a specific reference to improved transport infrastructure.</p>	Support noted. The Council wishes to promote a broader vision that develops all forms of infrastructure to improve connectivity whilst at the same time striving for carbon neutrality.
West Berkshire Green Exchange (lpr1547)	<p>Vision neither supported nor not supported but changes to text suggested:</p> <p>Words shown below in bold are changes or additions to the original text that we would like to see.</p> <p><b>3 Shaping West Berkshire: Vision and Objectives</b></p>	<p>Comments noted.</p> <p>Amend the first sentence of para 3.2 of the Emerging Draft LPR as follows –  'Making available <u>carbon neutral</u> housing of different types, sizes, tenures and affordability....'</p>



Respondent	Response	Council Response
	<p>3.2 Making available <b>carbon-neutral</b> housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability.</p> <p>3.3 .....Development will be better connected to local services, facilities and open space within the District, <b>by public transport, cycling and walking</b> and where relevant, in adjoining local authority areas.....</p>	<p>Amend the second sentence of para 3.3 of the Emerging Draft LPR as follows –</p> <p>‘Development will be better connected to local services, facilities and open space within the District, and where relevant, in adjoining local authority areas, <u>by favouring more sustainable means of travel including reducing the need to travel,....</u>’</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr278)	<p>Support for the Vision:</p> <p>We absolutely agree that development must be sustainable and contribute to carbon neutrality by 2030. Before development is undertaken, local infrastructure must be considered - can it cope with any additional traffic? The health and well-being of residents is important. Green spaces should be preserved. Residential and industrial development must be in sustainable locations.</p>	<p>Comment noted. The LPR is intended to support these aspirations.</p>
Caroline Farrant (lpr43)	<p>Vision not supported:</p> <p>Repeatedly you say you're providing affordable housing, but in reality they are not affordable. quality and design of houses is negligible.</p>	<p>Comments noted. The LPR seeks to provide a range of affordable housing tenures to meet identified local need, depending on the level of financial support needed to make housing affordable.</p>
Tim Hall (lpr630)	<p>Vision not supported:</p> <p>By 2037, West Berks should already have been carbon neutral for 7 years and yet the Vision does not reflect that adequately. So, not just "provide the space and environment for sustainable development" but "be a sustainably developed space and environment which is carbon neutral".</p>	<p>Comments noted. Paragraph 3.3 addresses carbon neutrality.</p> <p>Amend the first sentence of para 3.3 of the Emerging Draft LPR as follows – ‘Development and infrastructure will be sustainable, contributing to our aim to deliver carbon neutral by 2030 and thereafter....’</p>
Peter Norman (lpr948)	<p>Vision not supported:</p> <p>3.1 There is a real danger that this vision for the future will be out of date by the time you reach the final consultation. To not acknowledge the impact of</p>	<p>Comments noted.</p> <p>Given the preparation of the Employment Land Review 2020 was undertaken prior to the COVID 19 pandemic, the</p>

Respondent	Response	Council Response
	<p>Covid19 and potential changes on employment practices and needs means that the district could be tying into polices that are quickly outmoded in terms of business needs going forward. Have we spoken/surveyed existing employers about their needs/requirements/plans going forward in the light of their pandemic experience? For example how many businesses will be encouraging more home working going forward and hot desking requiring less office space going forward. What impact does homeworking have on providing local amenities to service a larger consumer base versus town centre amenities. What impact does the collapse of national chains have on the High Street going forward and what is it going to look like if we are to encourage footfall so the centre does not die?</p>	<p>Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The Local Plan will be reviewed at least every 5 years which will provide the opportunity for policy to respond to changes.</p>
<p>Ian Parsons (lpr824)</p>	<p>Support for the Vision: The plan seems to offer considerable support for the maintenance of the principle of the AONB. We welcome this and hope that this will continue. Our area has been walked and visited by people from outside the AONB much more in recent months and we would hope that the features of the AONB are retained so that visiting remains attractive.</p>	<p>Comments noted</p>
<p>Paula Saunderson (lpr947)</p>	<p>Support for the Vision selected, although response indicates not:  Until every dwelling and business premises you allow to be built can be operated in a net zero way you are allwoing inferior dwellings to be put into the market for future generations to buy probably unwittingly. The PAs I have seen go through recently do not meet your Vision in terms of Flood Management &amp; Mitigation, Bio-diversity, net zero Operations, traffic impacts etc .etc. So why would we have the confidence you can deliver the Vision given here.</p>	<p>Comments noted.</p> <p>The Local Plan Review is desirable and necessary even though the current adopted Local Plan has a number of years to run. This is in recognition of changes in circumstances and national policy. In addition, there is now a requirement for Local Plans to be reviewed every 5 years going forward.</p>
<p>Councillor Tony Vickers (lpr524)</p>	<p>Support for the Vision:  We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new development will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retro-fit for sustainability in use than is possible with new</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>development. The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan if necessary, at the expense of economic and even social sustainability. Although there is reference to the Council's Environmental Strategy in the next section (4.3) its significance is not made clear enough at various relevant points in Strategic Policies. Our approach to achieving this aspect of the Council's Vision will be to consistently give much greater weight to a development's contribution to mitigation of climate change than to being in keeping with the character and distinctiveness of the area. This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning and in the landscape of rural areas of greater impact than in recent decades.</p>	
<b>Landowners, site promoters and developers</b>		
<p>Savills for Newbury and District Agricultural Society (lpr2047)</p>	<p>Vision is neither supported nor not supported: Our client supports the Council's Vision to foster sustainable business growth and its commitment to ensuring a resilient and sustainable economy. However, our client considers that the Vision should include a commitment to maximise business and employment opportunities by taking advantage of the excellent highways infrastructure which exists in West Berkshire. The presence of the M4 and the A34 means that the district is very fortunate to have strong transport connections to key towns/cities across the south of England including Southampton, Oxford, London and Bristol. Our client is also supportive of Strategic Objective no.4 (SO4, Economy) which establishes a commitment to facilitate a diverse and sustainable economic base across the district. SO4 includes the provision of employment land which provides for a range of local job opportunities. In order to maximise employment opportunities in the district's most populated area (Newbury and Thatcham), the Council should ensure that there is sufficient flexibility in the plan to respond to the needs of growing sectors of the economy. As strategic logistics sites need to be located adjacent to the strategic road network, and there is significant demand for increased provision for them, the plan should allow for greater employment opportunities adjacent to the strategic road network, particularly at Junction 13 of the M4.</p>	<p>Comments noted.</p> <p>The Vision foresees better connectivity but is clear that infrastructure must be increasingly sustainable in order to meet the goal of carbon neutrality. All sustainable modes of transport should contribute and the Vision should not favour one mode in particular.</p> <p>The point about new employment provision will be considered through the HELAA and through the site allocated in the LPR for employment land.</p>

Respondent	Response	Council Response
<p>Barton Willmore for Donfield Homes Ltd (lpr2091)</p>	<p>Vision is not supported.</p> <p>We do not agree that the part of the vision set out at paragraphs 3.2 and 3.3 reflects the character of West Berkshire.</p> <p>Paragraph 3.2 states:  <i>“Making available housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability.”</i></p> <p>The above neglects to recognise that a mix of locations is also important to meeting housing needs. The rural nature of much of West Berkshire needs to be recognised within this paragraph in order to acknowledge that not all needs can be met through delivering housing in urban or relatively urban areas. There is a local need for housing in rural locations and the Council should allocate sites to meet this need.</p> <p>This is supported by paragraph 77 of the National Planning Policy Framework which states that:  <i>“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”</i></p> <p>At paragraph 3.3, the vision goes on to state that:  <i>“Development will be better connected to local services, facilities and open space within the District, and where relevant, in adjoining local authority areas, all of which will foster community cohesion, health and wellbeing.”</i></p> <p>Whilst the aims of community cohesion, health and wellbeing are supported, we question whether this will always be most successfully achieved through good connections to local services and facilities. Whilst in most cases, we agree that locating development such that future residents can benefit from existing local services and facilities, the rural nature of much of West Berkshire needs to be recognised. In particular, some settlements do not benefit from significant existing services or facilities, however, there is still likely to be a housing need arising from these settlements and people who wish to live there and benefit from a more rural location whilst benefiting from close proximity to Reading and Newbury. Indeed, high quality additional homes in and of themselves can result in community cohesion. This should not be overlooked by the Council.</p>	<p>Comments noted.</p> <p>The Vision says just that, “... towns and villages that meet their needs.....”. Allocations are proposed in both.</p> <p>The Council disagrees with the premise of the question. Connection to local services, facilities and open space are essential components for fostering community cohesion, health and wellbeing. Connectivity can be achieved in many different ways to support housing need of rural settlements. Policies are included in the LPR specifically to address development in rural locations to meet local needs.</p> <p>The specific comments for the site put forward here are dealt with in the updated HELAA.</p>

Respondent	Response	Council Response
	<p>With this in mind, we consider that our Client's Site, land off Reading Road, Lower Basildon, (reference BAS1 within the West Berkshire Housing and Economic Land Availability Assessment ('HELAA') (February 2020)) is well-placed to meet the need for housing in a more rural location. The Site lies on the edge of the existing settlement boundary of Lower Basildon and would form a logical addition to that settlement. We refer you to the other parts of our representations, our covering letter and enclosures for further detail in relation to the site which would provide in-fill development between existing residential uses.</p> <p>The vision should acknowledge the need for modest housing development in rural locations in order to truly meet the needs arising from West Berkshire.</p>	
Woolf Bond Planning for JPP Land Ltd (lpr2077)	<p>Vision is neither supported nor not supported.</p> <p>In our response to the earlier draft version of the Local Plan (December 2018), we highlighted our concern regarding the inconsistency of the Council's proposed vision with the approach of the NPPF, particularly paragraph 78). This related to the failure of the proposed vision to effectively support growth in villages. The revision to the vision (particularly the second paragraph) which includes references to both towns and villages is therefore consistent with national advice, as is the allocation our client's land north of Bath Road, Woolhampton.</p>	<p>Comments noted</p> <p>The specific comments for the site put forward here are dealt with in the updated HELAA.</p>
Sovereign Housing Association (lpr2156)	<p>Vision is neither supported nor not supported.</p> <p>Sovereign (SHA) are a leading Housing Association and a major developer delivering one of the largest new affordable housing programmes in the country. We manage just over 60,000 homes, housing around 140,000 residents, in 59 local authority areas across the south and west of England.</p> <p>Our homes are located in both urban and more rural areas supporting various communities and housing needs. As a major developer of affordable housing we currently build just under 1,800 homes per year with plans to deliver around 10,000 new homes over the next five years. SHA's roots were established when Newbury District Council transferred it's housing stock into West Berkshire Housing Association, which since 1989 has grown and evolved into Sovereign Housing Association. Whilst SHA has become one of</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>the largest housing associations in the country, we've held on to our local focus and our commitment to providing quality, affordable homes. We welcome the councils consultation on the Emerging Draft Local Plan Review 2020- 2037 (LPR) and the opportunity to provide our feedback.</p> <p>Again, we welcome the opportunity to engage with the Council with the formulation of the Local Plan update. We hope our input is of assistance and would welcome further engagement as the Council progresses the Local Plan Update.</p> <p>Our housing team works closely with the Council housing enabling officers and would welcome continued partnership and engagement. Should you require any clarification on the issues raised in this representation please do contact me.</p> <p>SHA welcome and support the objectives set out in section three of the LPR.</p> <p>At the time of publishing the LPR the Covid-19 pandemic has already had a devastating impact on communities and economies across the globe. Whilst the virus doesn't discriminate, the wider impacts of the pandemic have seemingly had a disproportionate impact on those with less secure jobs, on lower incomes and living in cramped or poor quality housing with limited access to open space and experiencing data poverty. Whilst the longer term impact of the pandemic on how we live, work and interact remains to be seen, the recovery will require innovation and a degree of flexibility that makes drafting a Local Plan now extremely challenging. The vision and objectives set out in the LPR need to acknowledge there will be a post pandemic recovery that requires the plan to be dynamic and flexible.</p>	
Woolf Bond Planning for JPP Land & Spitfire Bespoke Properties (lpr2316)	<p>Vision not supported.</p> <p><b>The Vision Statement</b></p> <p>In our response to the earlier draft version of the Local Plan (December 2018), we highlighted our concern regarding the inconsistency of the Council's proposed vision with the approach of the NPPF, particularly paragraph 78). This related to the failure of the proposed vision to effectively support growth in villages. The revision to the vision (particularly the second paragraph) which includes references to both town and villages is therefore consistent with national advice.</p>	<p>Comments noted.</p> <p>This comment does not relate to the Vision which the respondent now endorses in the previous paragraph here.</p> <p>Specifically the proposed site will be covered in the updated HELAA.</p>

Respondent	Response	Council Response
	<p>However, although allocations are proposed at some villages, there has been no consideration of growth in the smaller villages like Burghfield which would be consistent with that envisaged in the NPPF. The Council had confirmed that the new local plan would review the settlements boundaries of the smaller villages too. This would be consistent with NPPF 78. Moreover, the settlement boundary to Burghfield is out of date as it has not taken into account more recent developments that have occurred on the ground in the area.</p> <p>[Preferred approach]. Allocation of land located at Brook House Farm, Sulhamstead Road, Burghfield</p>	
<p>Armstrong Rigg Planning for Manor Oak Homes Ltd (lpr2416)</p>	<p>Vision is supported. Manor Oak Homes' support the vision set by the emerging LPR and in particular, the statement at paragraph 3.2 that: <i>"Making available housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability"</i>. This is a highly positive statement that speaks to a Local Plan that will seek opportunities to meet the development needs of its area in accordance with the presumption in favour of sustainable development and must be supported wholeheartedly.</p>	<p>Comments noted.</p>
<p>Barton Willmore for Sulham Estates (lpr2440)</p>	<p>Vision is supported.</p> <p>We note the key themes within Councils Vision and, in particular, the focus on community cohesion, health and wellbeing. The energy efficiency, landscape, heritage and biodiversity elements of the vision are also noted. In relation to the key themes of the vision, we consider that our Client's site, Land at Hall Place Farm, is highly consistent and offers the opportunity to realise the separate strands of the vision on a medium sized site which can be delivered in the short to medium term.</p> <p>Land at Hall Place Farm Tilehurst, provides the opportunity to accommodate in the region of 80 new homes, a farm shop, small workshop units (to support small and medium sized enterprises), allotments and new public</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>open space within a sustainable location adjoining the Eastern Urban Area. The majority of the homes are intended to be delivered as private rental which would be retained and managed by the landowner. The landowner has a track-record of providing quality accommodation to very longstanding tenants and believes that the private rented sector can offer a genuine, long-term alternative to homeownership. Please refer to the Vision Document which accompanies these representations and other supporting reports for further information as to the details of the proposal.</p> <p>Land at Hall Place Farm (TIL18 in the Council's HELAA 2020) should be allocated on the basis that the development proposal offers the opportunity for an exemplar scheme to reflect the Council's Vision for the district.</p>	
Origin 3 for Sandtrend Ltd (lpr2392)	<p>Vision is neither supported nor not supported.</p> <p>National Planning Policy Framework (NPPF), 2019 (and the Draft NPPF, January 2021). Further, the Government maintains its commitment to accelerating housing growth and positive planning. Its 'Build, build, build' agenda is founded on this approach.</p> <p>In turning to the LPR Vision for West Berkshire, this includes making available housing of different types, sizes, tenures and affordability a priority – and that these are provided at towns and villages to meet needs. This too is positive. And para 4.10 of the LPR, its Vision in directing development, recognises that Newbury and neighbouring Thatcham will be the main focus for new development - an approach which follows that of the West Berkshire Core Strategy (adopted 2012). Again this is broadly supported by our client. However, the Vision, in setting a direction through the plan period must support the delivery of an aspirational and deliverable Local Plan – reflecting a robust approach which recognises the challenges and effects of COVID-19 and Brexit, and be flexible to adapt to rapid change. In that respect further consideration should be given by the Council to the Vision so that the LPR can cater for and respond promptly to such change.</p>	<p>Comments noted.</p> <p>The Vision for the LPR is intended as a constant and should not be confused with tactical means for delivery which may well need to respond to change. The LPR will be reviewed every 5 years as required and should ensure that the aspiration of the Vision remains intact.</p>
Rural Solutions (lpr2311)	<p>Vision is neither supported nor not supported.</p> <p>Whilst we agree that the AONB will 'remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside'.</p>	<p>Comments noted.</p> <p>The Council's strategy is to direct development to the most sustainable locations in accordance with the settlement</p>



Respondent	Response	Council Response
	<p>It is important to recognise that rural needs should continue to be met, secured through the retention, enhancement and future viability of local community facilities and local services. This should be emphasised, especially important given 90% of West Berkshire is rural in character. A general policy of restraint outside of those settlements identified in Appendix 3 and on the policies Map is not going to achieve this long-term ambition. These areas are treated as 'open countryside' as set out in Policy DC1.</p>	<p>hierarchy. Policies SP13-15 identify the sites that are considered suitable in relation to the hierarchy taking into account the assessment of sites carried out through the HELAA.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Strategic Objectives

### (Proposed Submission LPR reference: Strategic Objectives)

Number of responses received: 31

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr710)	<p>Support all these objectives, and of course they overlap with each other in many respects, so this interconnection should be explored and exploited. The historic environment and culture (7 and 6 respectively) play a huge part in the economy (4), the vitality of town centres (5) and the character of the AONB (8), and human activity has created many of the parks, gardens, fields and open spaces that make up Green Infrastructure (9). Today's transport and infrastructure if well designed becomes part of the character and interest of the district in the future, as the historic routes, railways and canals are seen now.</p> <p>Section 7 Heritage - prefer the phrase 'special interest of the historic and natural environment'. The historic (ie people's interaction on places, <i>right up to the present day</i>) includes buildings, earthworks, landscape and drainage modifications as well as planting and managing flora). Dividing the environment into built, historic and natural gives a misleading message that that 'historic' is somehow separate from built, and perhaps the historic is just the old crumbly bits!</p>	<p>Comments noted</p> <p>The NPPF states that one of the three overarching objectives of the planning system is to protect and enhance our natural, built and historic environment and the wording is consistent with that.</p>
Public Protection Partnership (lpr13)	Supports the objectives	Comments noted
<b>Statutory consultees</b>		

Respondent (with lpr ref)	Response	Council Response
Chieveley Parish Council (lpr1717)	<p>Chieveley Parish Council agrees with the Strategic Objectives of the plan (3.5) and, in particular, that the landscape in the North Wessex Downs should remain of outstanding value (3.4).</p> <p>The plan must continue to conserve and enhance the North Wessex Downs AONB in accordance with national policies.</p> <p>Any landscape-led development should be both appropriate within that policy context and deliver wider environmental, economic, and social benefits. These requirements should also have regard to local needs.</p>	Comments noted
Cold Ash Parish Council (lpr1729)	<p>Cold Ash Parish Council supports the listed strategic objectives. It is good that these are succinctly worded, which aids clarity.</p> <p>Objective 10 Transport could be improved by signalling a real intent to reduce traffic journeys through the impact of increased home working. This would be a major contributor to many of the other objectives (e.g. 1, 4, 7) and would of course help to offset the impacts of all the extra dwellings built over the life of the Plan.</p> <p>The reference to home working in policy DC38, mentioning increasing FTTP connections to new homes, is welcomed. Ideally there should also be incentive schemes for employers to provide greater opportunities for homeworking for their staff.</p>	<p>Comments noted.</p> <p>Recent developments in communication technology are enabling many employers to provide opportunities for hybrid working.</p>
Greenham Parish Council (lpr875)	<p>We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new development will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retro-fit for sustainability in use than is possible with new development.</p> <p>The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan – if necessary, at the expense of economic and even social sustainability. However nothing could be more likely to fail to secure social and economic sustainability than failure to tackle climate change, because all the evidence (e.g. The Stern Report of 2006) indicates that the costs of doing so overall and in the long term will increase unless measures are taken early.</p>	<p>Comments noted.</p> <p>Mitigating and adapting to the impact of climate change in order to minimise demand for energy is a key priority for the Council.</p> <p>The principles of climate change adaptation and mitigation are embedded in Policy SP5 and supported by other policies in the LPR.</p> <p>All development will be required to meet the high standards and design required to reduce the impact of climate change.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Therefore our approach to achieving this aspect of the Council’s Vision will be to consistently give much greater weight to a development’s contribution to mitigation of climate change than to being “in keeping with the character and distinctiveness of the area”. This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning and in the landscape of rural areas of greater impact than in recent decades.</p> <p>Over the Plan period, even if all new homes are built to zero carbon standards, there will by 2037 be only a small reduction in the overall carbon footprint of the District. New build in any one year seldom accounts for more than 1% of total built stock.</p> <p>We should be insisting on the highest standards in all new builds and encouraging the opportunity to upgrade and replace poorly insulated and badly maintained buildings, in addition to permitting new build.</p> <p>Whatever can be done through the planning system by amending this Local Plan should be done, in the interests of sustainability. Our Vision is for West Berkshire to set the national benchmark standard for ‘green prosperity for all’.</p>	
Hungerford Town Council (lpr120)	Agree with these objectives	Comments noted
Shaw cum Donnington Parish Council (lpr1591)	3.5 We support the strategic objectives. In particular we support 3.5 11 that “ensure the infrastructure (physical and social)...keep pace with development...” In the case of Shaw-cum-Donnington and Greenham very little social infrastructure has been provided and we urge that this situation is changed.	Comments noted
Stratfield Mortimer Parish Council (lpr388)	Throughout this section there are a lot of words or phrases that are used that, without definition, can mean anything. This section deals with objectives and unless they are presented in some measurable form, they are fairly meaningless. For instance, objective one is to mitigate and adapt to the effects of climate change. Does this mean that new development can be accepted if it is capable of withstanding the changed climate or does it mean that all development should be altered to reduce the extent of climate change?	Comments noted.  The Proposed Submission LPR will include a glossary and an appendix which will set out how the LPR policies will be monitored and delivered.

Respondent (with lpr ref)	Response	Council Response
	Clarity and definition of terms is required along with what measurable achievements are expected to meet these objectives so that progress on these objectives can be measured.	
Thatcham Town Council (lpr1384)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p><b>Section 3.5</b></p> <ul style="list-style-type: none"> <li>"strategic objectives ... all-encompassing and interrelated"</li> </ul> <p>We do not disagree with the 11 items listed when taken individually. Nevertheless, there is a lack of a cohesive vision that brings these together that outlines the inter-relation. Given that this is the first Local Plan that brings together the Development Plan, Housing Allocation Plan, and Policies, this appears to be a missed opportunity.</p>	<p>Comments noted.</p> <p>A clear vision and direction for the LPR is set out in paragraphs 3.1-3.4 of the Emerging Draft LPR</p>
<b>General consultation bodies</b>		
Sovereign Housing Association (lpr2157)	<p>SHA welcome and support the objectives set out in section three of the LPR. Whilst reference is made at paragraph 3.2 of "Our Vision" to "<i>Making available housing of different types, sizes, tenures and affordability will be a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability.</i>", further reference and a stronger commitment to delivering more affordable homes could be made within the Strategic Objectives under objective two "Housing".</p> <p>Objective 5 "Town Centres" seeks "<i>To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities</i>". As highstreets and town centres look to bounce back from the pandemic it is important the LPR builds in maximum opportunity to bring variety and vitality into the town centres. Whilst a balance needs to be struck, SHA believe Objective 5 should be expanded to recognise the positive contribution town centre living can make to vibrant towns when complemented by suitable public spaces and amenity.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy DC21 Residential use of space above shops and offices supports the expansion of residential uses in town centres.</p> <p>Also from the 21st August 2021 the new Permitted Development rights enables the conversion of Class E Uses of the new Use Classes Order (Commercial, Business and Service) buildings to dwellings. This is expected to increase residential uses in town centres.</p>
West Berkshire Green Exchange (lpr1548)	Words shown below <b>in bold</b> are changes or additions to the original text that we would like to see.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p><b>3. Sustainable and Quality Development</b></p> <p><b>To ensure provision of sustainable <u>carbon neutral</u> developments of high quality design, construction and efficiency</b></p> <p>5.</p> <p><b>Town Centres</b> To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities <b><u>easily accessible by public transport cycling and walking.</u></b></p> <p><b>9. Green Infrastructure and Healthy Living</b> <i>To ensure that West Berkshire contains a strong network of multi-functional green infrastructure which provides health and environmental benefits and enhances the overall quality of life of sustainable communities. <b>The Council will promote the provision of additional allotment spaces throughout the district to support the health and economic benefits of growing one's own food.</b></i></p> <p>10. Transport <b>The council will prioritise the provision of</b> transport networks that support sustainable growth in West Berkshire and <b><u>the promotion of</u></b> low emission transport choices.</p>	<p>The objectives are by their very nature strategic, all-encompassing and interrelated. The proposed suggested changes cover more detailed and specific issues which are considered more appropriately highlighted under relevant Emerging Draft LPR policies:</p> <p>Policy SP 5: Responding to Climate Change Policy SP 7: Design Principles Policy SP 10: Green Infrastructure Policy SP 22: Transport</p>
West Berkshire Heritage Forum (lpr65)	3.5 7. Heritage. We recommend the expanded wording: “To <u>record</u> , conserve, enhance <u>and protect</u> the local distinctive character, identity, significance and special interest of the built, historic and natural environment in West Berkshire’s towns, villages and countryside.”	<p>Comments noted.</p> <p>Conserve and enhance encompasses ‘record’ and ‘protect’. This is more fully explained and detailed in Emerging Draft LPR policies SP9 and DC8 – DC13 and supporting text.</p>
<b>Other stakeholders</b>		
David Copas (lpr1430)	<p>The chapter on ‘Our Vision and Strategic Objectives’ need to be strong and future proofed.</p> <p>The vision statement in para 3.4 is welcome and that West Berkshire’s landscape in the North Wessex Downs will remain of outstanding value and</p>	<p>Comments noted.</p> <p>The objectives are by their very nature strategic, all-encompassing and interrelated. The strategic policies expand on the issues raised with regards to the natural</p>

Respondent (with lpr ref)	Response	Council Response
	<p>its biodiversity more abundant in settlements and the surrounding countryside.</p> <p>However strategic objectives on Heritage, AONB and Green infrastructure do not spell out a compelling vision for nature. Written strategic objectives on nature are sadly lacking. This means the Council's plan lacks ambition for the future and demonstrates no apparent priority is attached to the natural environment, biodiversity or nature conservation.</p> <p>It is remarkable that the clear global concerns on biodiversity, species loss, habitat loss and climate emergency, well-rehearsed in section 5, are so condensed into inanimate, inherited and purely visual aspects of our area. The council should aim do far more to respond to peoples concern that this is not only under threat globally but also imperilled by weakness in their own plans.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b> <ul style="list-style-type: none"> <li>○ Gives a specific means to deliver the vision of abundant biodiversity across the entire area,</li> <li>○ Holds the council to account for concerns of local people on delivery of Section 5 currently called 'our environment and surroundings',</li> <li>○ To be measured by conservation of existing assets and the creation of new ones.</li> </ul> </li> </ul> <p>Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by developers.</p> <p><b>Chapter 5 Our environment and surroundings – responding to climate change</b></p> <p>There are several important and strategic statements to emphasise here, in particular:</p> <p>'To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11</p> <p>Ecological distinctiveness – design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11</p>	<p>environment with Policies SP8, SP10 and SP11 setting out the Council's strategic approach in more detail.</p> <p>The Proposed Submission LPR will include a glossary and an appendix which will set out how the LPR policies will be monitored and delivered, including for the natural environment with indicators and targets to assess if the objectives are being met.</p> <p>In accordance with the Environment Act 2021 all development will be required to contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to the nature recovery networks (see Policies SP10 and SP11).</p> <p>A new chapter on Nature Delivery is not considered necessary as the topic is well covered in the LPR with policies giving sufficient protection and criteria on assessing development proposals.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings.</p> <p>Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to nature recovery networks.</p> <p>However the absence of the strategic priority reduces their impact and will not ensure their delivery.</p> <p><b>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b> This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect.</p> <p>Changes - <b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b></p> <p><b>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b></p>	
Sam Coppinger (lpr279)	AONB should be protected, local character preserved everywhere.	Comments noted
Peter Dowling (lpr2339)	<p>Support. The inclusion of Strategic Objective 4 (Economy) objective is welcomed and the specific reference to “...support a strong, diverse and sustainable economic base across the district.” is supported as it represents a key delivery outcome that the LPR must help achieve. As noted in paragraph 4.81 of the West Berkshire District Council Employment Land Review (ELR) (August 2020), the industrial market itself is very diverse and strong and this should also be reflected in the LPR:</p> <p>“The industrial market in West Berkshire is very diverse, attracting a range of size and type of occupiers – typically we do not see one particular sector driving demand for space. The area is attractive to some B8 distribution due</p>	<p>Comments noted.</p> <p>The employment market, the diverse economic base of the District, and the need to support growth are recognised in Policy SP20.</p>



Respondent (with lpr ref)	Response	Council Response
	to its east/west links along the M4 and north/south link through the A34. Also, there is activity from business servicing the local and regional markets.	
Caroline Farrant (lpr44)	We are not seeing the suggested mitigated effects of the proposals, were just seeing trees and green spaces disappear, a good example is the crammed in housing on the Robin Hood.	Comments noted.  Any replacement or mitigation measure must seek to secure a net gain in lost functionality and be deployed as closely as possible to the affected green infrastructure asset.
Tim Hall (lpr635)	<p>1. <b>Climate Change</b> should include specific reference to carbon neutrality being achieved as the overriding objective of the plan by 2030, and bettered thereafter, in light of the Climate Emergency.</p> <p>2. <b>Housing</b> should include specific reference to both affordable and social housing rather than just 'identified need'.</p> <p>3. <b>Sustainable and Quality Development</b> should include specific reference to achieving carbon neutrality, in light of the Climate Emergency.</p> <p>4. <b>Economy</b> should include specific reference to maximising re-use of existing brownfield land rather than just 'provision' generally.</p> <p>5. <b>Town Centres</b> should include specific reference to overcoming the challenge of the decline of retail (with the trend to online shopping accelerated by Covid-19) and, associated with that, achieving a greater use of town centres as places in which to live. It should also reference, along with vitality and viability, attractiveness as a place to both live and visit, and 'greening' as a part of that and in light of the Climate Emergency.</p> <p>8. <b>AONB</b> should include reference to the specific need to increase forestry in light of the Climate Emergency and to foster biodiversity.</p> <p>9. <b>Green Infrastructure and Healthy Living</b> should also include reference to biodiversity.</p> <p>10. <b>Transport</b> should say 'ensure' provision.</p> <p>11. <b>Infrastructure</b> should include reference to infrastructure being sustainable and capable of withstanding climate change.</p>	Comments noted.  The objectives are by their very nature strategic, all-encompassing and interrelated. The proposed suggested changes cover more detailed and specific issues which are considered more appropriately highlighted under relevant policies:

Respondent (with lpr ref)	Response	Council Response
		All the points raised are covered in detail under the policies listed above.
Ian Halliday (lpr597)  Jane Halliday (lpr598)	<p>Climate change is the biggest issue facing this council and consequently, it has to be the top priority in all council actions and activities if the target of carbon neutrality by 2030 is to be reached. Therefore Objective 1 (Climate Change) should state that all new development has to make a major contribution towards this.</p> <p>Housing delivery in the draft plan is too reliant on large edge-of-town developments, specifically Sandford and NE Thatcham. These are not sustainable developments and are incompatible with the council's environment strategy and climate change targets.</p> <p>As estates that would be dominated by car use, the Sandford and NE Thatcham developments contravene the council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in Vision point 3</p> <p>Objective 1 (Climate Change) should state that all new development has to make a major contribution towards this.</p> <p>The Sandford and NE Thatcham developments must comply with the council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in Vision point 3.3</p>	<p>Comments noted.</p> <p>A significant number of policies in the LPR do require development to make a substantive contribution towards mitigation and adapting to the impact of climate change.</p> <p>The release of sustainable urban extensions is considered necessary to meet anticipated future housing need including affordable housing. The sites have been assessed as being the most sustainable through the LAA, site selection methodology and SA. The requirements to meet climate change policies will be enforced through planning conditions and S.106 agreements.</p>
Susan Millington (lpr459)	<p>Climate change is the biggest issue facing this council (or any other authority, locally, nationally and internationally). It has to be the No 1 priority in everything we do if the target of carbon neutrality by 2030 is to be reached. I note Objective 1 (Climate Change) but this does not go far enough. New development has to make a major contribution towards this; it is no good waiting until the houses are built and then having to spend far more on retro-fitting them.</p> <p>Housing delivery in the current draft plan is too reliant on large edge-of-town developments, namely Sandford and NE Thatcham. I believe these are not sustainable developments in any meaningful sense of the word, and are incompatible with the council's environment strategy and climate change targets.</p> <p>As estates that would be dominated by car use, they contravene the</p>	<p>Comments noted.</p> <p>Please see response as above.</p> <p>The release of sustainable urban extensions is considered necessary to meet anticipated future housing need including affordable housing. The sites have been assessed as being the most sustainable through the HELAA, site selection methodology and SA. There is insufficient supply of brownfield land to meet housing need.</p> <p>The requirements to meet climate change policies will be enforced through planning conditions and S.106 agreements.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in the Vision section 3. The need for these two new estates could be mitigated or eliminated by:</p> <ol style="list-style-type: none"> <li>1) Identifying more brownfield sites within existing settlements and using the JV with Sovereign Housing and/or the proposed WBC Housing Company to develop these sites with a focus on social housing.</li> <li>2) Scaling back the office space development envisaged in the plan as demand is unlikely to grow as envisaged in the plan, as businesses adapt post-Covid.</li> <li>3) Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This would involve relocating the existing distribution centres to a more appropriate location closer to the motorway junctions. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</li> <li>4) There is a need for more rural homes, particularly affordable and social housing (rather than “executive homes”) that would enable younger families to live and work there. This would enable villages to thrive and not just become nice places for commuters to spend their evenings and weekends. In addition the windfall allowance of 140 dwellings a year in the plan is less than the historical volume. Making assumptions in line with recent years would further reduce the need for new edge-of-town development.</li> </ol> <p>Overall, there is a perception that the draft plan concentrates on building as many homes as possible in just two areas rather than take a more imaginative, balanced and district-wide approach. The plan also has an unconvincing approach to affordable housing.</p>	<p>The remainder of the issues raised are considered under responses to the Spatial Strategy, and responses to housing allocations at Sandford and NE Thatcham.</p>
Peter Norman (lpr950)	<p>Objective 3 In ensuring that the environment and sustainable development is to the forefront of all planning considerations. Unfortunately we have seen in recent applications that Councillors have been all too willing to overrule environmental considerations in planning to the detriment of biodiversity that is acknowledged in the NPPF as critical in our efforts to tackle climate change</p> <p>Objective 11 To ensure that infrastructure needs physical and social <b>arising from growth</b> in West Berkshire are provided to support and keep pace with developments in accordance with the detail set out in the Infrastructure</p>	<p>Comments noted.</p> <p>The impact of alternative allocation options on biodiversity and the landscape have been assessed in the HELAA, through the site selection process, SA/SEA and the Habitats Regulations Assessment. These have resulted in the proposed site allocations in the LPR.</p>

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	<p>Delivery Plan. This objective should not be limited to "arising from growth" It should be an objective to ensure infrastructure meets the needs of the current 158,400 inhabitants of the district and especially the 70,000 odd inhabitants of Newbury and Thatcham where it is clear that current infrastructure are not meeting their needs especially in regard to traffic densities in the town centres and the resultant air pollution which breaches the aims of 3.3</p> <p>Changes -</p> <p>3.3 We should consider Basingstoke and Deane's approach who have with a Landscape, Biodiversity and Trees Supplementary Planning Document. This would be reference document that can be used in advance of site selection and planning to inform early decision making and help avoid monetary or environmental costs later in a project that could have been avoided</p> <p>3.5.11 To ensure that infrastructure needs, physical and social, in West Berkshire are provided to support current and future inhabitants of the district as outlined in the Infrastructure Delivery Plan. This includes reviewing the current state of infrastructure to meet the needs of the population as well as ensuring that sufficient new infrastructure in place to support and keep pace with future developments.</p>	<p>The Council will produce SPDs where necessary to provide more guidance to policies.</p>
<p>Debby Reynolds (lpr1306 and lpr2459)</p>	<p><b>Response to consultation by West Berkshire Council on Emerging Draft West Berks LPR and Thatcham Growth Study Stage 3 report by David Lock Associates</b></p> <p>[NB. The response is recorded all together under lpr1305 for SP17 NE Thatcham, and separately in lpr1307, 1308, 1309 and 1310. It keeps the original numbering of the recommendations.]</p> <p><b>Chapter 3 Shaping West Berkshire Vision and Objectives</b></p> <p>The chapter on 'Our Vision and Strategic Objectives' need to be strong and future proofed.</p> <p>The vision statement in para 3.4 is welcome and that West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside.</p> <p>However strategic objectives on Heritage, AONB and Green infrastructure do not spell out a compelling vision for nature. Written strategic objectives</p>	<p>Comments noted.</p> <p>The objectives are by their very nature strategic, all-encompassing and interrelated. The strategic policies expand on the issues raised with regards to the natural environment with Policies SP8, SP10 and SP11 setting out the Council's strategic approach in more detail.</p> <p>The Proposed Submission LPR will include a glossary and an appendix which will set out how the LPR policies will be monitored and delivered, including for the natural environment with indicators and targets to assess if the objectives are being met.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>on nature are sadly lacking. This means the Council's plan lacks ambition for the future and demonstrates no apparent priority is attached to the natural environment, biodiversity or nature conservation</p> <p>It is remarkable that the clear global concerns on biodiversity, species loss, habitat loss and climate emergency, well-rehearsed in section 5, are so condensed into inanimate, inherited and purely visual aspects of our area. The council should aim do far more to respond to peoples concern that this is not only under threat globally but also imperilled by weakness in their own plans.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b> <ul style="list-style-type: none"> <li>○ Gives a specific means to deliver the vision of abundant biodiversity across the entire area,</li> <li>○ Holds the council to account for concerns of local people on delivery of Section 5 currently called 'our environment and surroundings',</li> <li>○ To be measured by conservation of existing assets and the creation of new ones.</li> <li>○ Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by developers.</li> </ul> </li> </ul> <p><b>Chapter 5 Our environment and surroundings – responding to climate change</b></p> <p>There are several important and strategic statements to emphasise here, in particular:</p> <p>'To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11</p> <p>Ecological distinctiveness – design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11.</p> <p>A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a</p>	<p>In accordance with the Environment Act 2021 all development will be required to contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to the nature recovery networks (see Policies SP10 and SP11).</p> <p>A new chapter on Nature Delivery is not considered necessary as the topic is well covered in the LPR with policies giving sufficient protection and criteria on assessing development proposals</p>

Respondent (with lpr ref)	Response	Council Response
	<p>variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings.</p> <p>Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to nature recovery networks.</p> <p>However the absence of the strategic priority reduces their impact and will not ensure their delivery.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b> This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect.</li> </ul> <p><b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b></p> <ul style="list-style-type: none"> <li>• Gives a specific means to deliver the vision of abundant biodiversity across the entire area,</li> <li>• Holds the council to account for concerns of local people on delivery of Section 5 currently called ‘our environment and surroundings’,</li> <li>• To be measured by conservation of existing assets and the creation of new ones.</li> <li>• Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by developers.</li> </ul> <p><b>Recommendation - 5: In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b> This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect.</p>	
Graham Storey (lpr560)	<p>Climate change is the biggest issue facing this council (or any other authority, locally, nationally and internationally). It has to be the No 1 priority in everything we do if the target of carbon neutrality by 2030 is to be reached. We note Objective 1 (Climate Change) but this does not go far enough. New development has to make a major contribution towards this; it</p>	<p>Comments noted.</p> <p>See Policy SP5 - Depending on the nature and scale of proposals, development will be expected to satisfy all of</p>

Respondent (with lpr ref)	Response	Council Response
	is no good waiting until the houses are built and then having to spend far more on retro-fitting them.	the relevant policy criteria in order to contribute towards mitigating and adapting to the impact of climate change.
Councillor Tony Vickers (lpr525)	<p>We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new development will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retro-fit for sustainability in use than is possible with new development.</p> <p>The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan – if necessary, at the expense of economic and even social sustainability. Although there is reference to the Council’s Environmental Strategy in the next section (4.3) its significance is not made clear enough at various relevant points in Strategic Policies.</p> <p>Our approach to achieving this aspect of the Council’s Vision will be to consistently give much greater weight to a development’s contribution to mitigation of climate change than to being “in keeping with the character and distinctiveness of the area”. This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning and in the landscape of rural areas of greater impact than in recent decades.</p> <p>Changes needed - Absolute priority being given to tackling Climate Change</p>	<p>Mitigating and adapting to the impact of climate change in order to minimise demand for energy is a key priority for the Council.</p> <p>The principles of climate change adaptation and mitigation are embedded in Policy SP5 and supported by other policies in the LPR.</p> <p>All development will be required to meet the high standards and design required to reduce the impact of climate change.</p>
Ian Watson (lpr683)	<p>More recognition needs to be given to the impact of new housing on demand for water. The Kennet CAMS already identifies that under most flow conditions, capacity for abstraction is limited. How will water be supplied sustainably to the new developments?</p> <p>Changes - Seek concrete plans from Thames Water on how it intends to meet additional demand for water and what timescale will be required. Due to constraints on the ability of utilities to carry out capital spend this timetable may not match the planning timetable.</p>	<p>Comments noted.</p> <p>Water resources is dealt with under Emerging Draft LPR Policy DC6</p>
<b>Landowners, site promoters and developers</b>		

Respondent (with lpr ref)	Response	Council Response
Aldi Stores Ltd (lpr2286)	Overall, we support the strategic objectives set out in Para 3.5 and agree that the strategic objectives are both all encompassing and interrelated, and will apply in both urban and rural areas. They are also a good barometer for the key delivery outcomes that the Local Plan Review should measure.	Support noted
Armstrong Rigg Planning for Manor Oak Homes (lpr2417)	<p><i>Full representation promoting development of Land at Fairview, Greenways, Lambourn is attached.</i></p> <p>It is unfortunate that following such a strong start, the emerging LPR proceeds to set a series of unambitious strategic objectives that appear to be wholly unrelated to the proposed vision for the area.</p> <p>To take the vision for housing delivery (as set out above) as an example. The vision is of a Local Plan that prioritises the delivery of housing of different types, sizes and tenures to meet local needs, but this is translated into a strategic objective that reads:</p> <p><i>“2. To ensure that the identified housing need will be met across the District up to the end of the plan period.”</i></p> <p>Paragraph 3.5 of the emerging LPR states that the strategic objectives represent the key delivery outcomes that the success of the LPR will be measured against. As such a strategic objective to simply ensure that the identified housing need is met is simply not good enough in ensuring the housing vision of the Local Plan is delivered. This objective makes no reference to the provision of different types, sizes and tenures of housing, or to the need to locate these homes where they are needed.</p> <p>To ensure that the LPR delivers on its vision of prioritising the delivery of housing of different types, sizes and tenures to meet local needs, this vision must be reflected in the strategic objective for housing. We recommend, that strategic objective 2 is amended as follows:</p> <p><i>“2. To ensure that the identified <b>housing needs for different types, sizes and tenures of housing in specific towns and villages and in the District as a whole</b> will be met across the District up to the end of the plan period.”</i></p>	<p>Comments noted.</p> <p>Objective 2: Housing to be amended as follows:</p> <p><del>To ensure that the identified housing need will be met across the District up to the end of the plan period</del>  <u>To provide a range of sites to ensure that the District’s housing needs and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations.’</u></p>
Southern Planning Practice for the Saunders family (lpr1992)	<p><i>Full representation on behalf of the Saunders Family promoting development to the east of Stoney Lane is attached.</i></p> <p>We are supportive of West Berkshire’s vision set out in paragraphs 3.1 to 3.4 of the Local Plan Review Consultation document. We strongly agree with the</p>	<p>Comments noted.</p> <p>A Housing Background Paper will be produced to accompany the Proposed Submission LPR.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Council's priority to make available housing of different types, sizes, tenures and affordability. In addition to focusing most of the growth in the urban areas, the Council should look to all settlements and available land within the district in sustainable locations to help meet this priority.</p> <p>In order to have a robust five-year land supply, the council should look to all settlement tiers in the hierarchy to deliver homes through a range of small, medium and strategic sites. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure they are not vulnerable to unsustainable, speculative development. We agree that the 11 strategic objectives are all-encompassing. With regards to strategic objective 2, whilst we agree that the identified housing need should be met across the District up to the end of the plan period, we consider that in light of the contents of paragraph 59 of the NPPF, which refers to the Government's objective of significantly boosting the supply of homes, the Council should be more ambitious and plan for the objectively assessed housing need as a minimum. As per the Planning Practice Guidance (PPG) (Paragraph: 001 Reference ID: 68-001-20190722), the standard method for calculating local housing need provides a <b>minimum</b> (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach. We do not believe that there are an exceptional circumstances which would justify an alternative approach in West Berkshire.</p> <p>Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the National Planning Policy Framework (NPPF), the Local Plan Review must: <i>"provide (ing) a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development"</i>.</p> <p>Strategic Objective 5 looks to enhance the vitality and viability of town, district and local centres in West Berkshire. Land to the east of Stoney Lane would provide a significant addition to the population of Newbury which</p>	

Respondent (with lpr ref)	Response	Council Response
	would help to achieve this objective. The allocation of the site would also contribute to meeting several of the Plan's strategic objectives.	
Southern Planning Practice for the Saunders family (lpr2114)	<p>(Full representation attached, in relation to land at Coombe Bottom Farm, Streatley)</p> <p>We are supportive of West Berkshire's vision set out in paragraphs 3.1 to 3.4 of the Local Plan Review Consultation document. We strongly agree with the Council's priority to make available housing of different types, sizes, tenures and affordability. The Council should look to all settlements and available land within the district in sustainable locations to help meet this priority. In order to have a robust five-year land supply, the council must look to all settlement tiers in the hierarchy to deliver homes through a range of small, medium and strategic sites. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements. We agree that the 11 strategic objectives are all-encompassing. With regards to strategic objective 2, whilst we agree that the identified housing need should be met across the District up to the end of the plan period, we believe that the Council should be more ambitious and plan for the identified housing need as a minimum. As per the Planning Practice Guidance (PPG) (Paragraph: 001 Reference ID: 68-001-20190722), the standard method for calculating local housing need provides a <b>minimum</b> (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach.</p> <p>Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the National Planning Policy Framework (NPPF), the Local Plan Review must:</p> <p><i>"provide (ing) a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development"</i>.</p> <p>Strategic Objective 8 looks at the AONB and seeks to continue to conserve and enhance the North Wessex Downs AONB with appropriate landscape-</p>	<p>Comments noted.</p> <p>A Housing Background Paper will be produced to accompany the Proposed Submission LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	led development delivering wider environmental, economic and social benefits. We support this objective and encourage new development which is landscape-led and which conserves and enhances the North Wessex Downs AONB.	
Turley for Panattoni (lpr2380)	<p><i>Full representations by Turley on behalf of Panattoni, supporting allocation of land to the north of the A4, Theale for employment development, are attached with extracts below.</i></p> <p><b>Strategic Objective 4</b></p> <p>Panattoni support strategic objective 4 which states; <i>“To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.”</i></p> <p>Panattoni would however note that it is essential that any future planning policies and employment allocations pursued through the Local Plan Review allow sufficient flexibility to accommodate changes in market and consumer demand over the life time of the Development Plan to ensure that this objective is met.</p>	<p>Comments noted.</p> <p>It is a requirement for Local Plans to be reviewed 5 years from adoption. This would allow for changes in market and consumer demand to be considered.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

Emerging Draft LPR reference: Background to Development Strategy

(Proposed Submission LPR reference: Background to Development Strategy)

Number of responses received: 18

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lp714)	<p>Support approach</p> <p>Para 4.5 and the following map (which is too small) should be better linked. There are constraints mentioned in the text which aren't on the map and vice versa. NB also the map doesn't show <i>all</i> constraints. Furthermore many heritage assets especially non-designated ones, can be opportunities for sustainable development as much as a negative limitation. However in heritage terms you've omitted Scheduled Monuments which of course <i>do</i> require an additional consent regime for change.</p>	<p>Support for approach noted.</p> <p>Emerging Draft LPR paragraph 4.5 – Update figure 1 and amend the text as follows -            'West Berkshire contains a number of physical and environmental constraints which influence the location of development. <u>At a strategic level</u> <del>These</del> these include the North Wessex Downs (AONB), which covers 74% of the District, substantial areas liable to flood, the presence of Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, a registered battlefield to the west of Newbury, <u>various international and national nature conservation designations and the River Lambourn Nutrient Neutrality Zone (NNZ) as identified in Figure I below.</u> In addition there are other <del>designations heritage assets</del> designations, including conservation areas <u>and</u> historic parks and gardens <u>which due to scale are not included in Figure 1, but which are included on the Policies Map, and.</u>'</p>
<b>Statutory consultees</b>		

Respondent (with lpr ref)	Response	Council Response
Greenham Parish Council (lpr877)	Support approach. GPC would like to see the creation of viable communities. To look at the local plan with respect to providing housing to communities to enable them to be sustainable. With the obvious benefits associated with being able to live and work in your community	Support for approach noted.
Hungerford Town Council (lpr123)	Support for approach	Support for the approach noted.
Shaw-cum-Donnington Parish Council (lpr194)	In general we support the strategy. In many places we see the term “sustainable development” and “a presumption in favour of sustainable development” We have difficulty understanding this term from the text. Any built development on undeveloped land is unsustainable as it takes away agricultural or other land that cannot be replaced as land is a finite resource. Even redevelopment is unsustainable as it uses finite resources such as minerals that cannot be replaced. Thus the absolute term “sustainable” is misleading and should be replaced by “minimise the adverse effects on the environment”.	Support for the strategy noted.  No changes are required as a result of this representation. Development can be sustainable if it is brought forward in a way that balances economic, social and environmental factors.
Stratfield Mortimer Parish Council	Do not agree with approach It is unclear what <b>para 4.3</b> means. Are the 5 strategic aspirations part of the local plan? If they are, they need to be integrated into the plan and there is no evidence of this. Similarly, what relevance does the declaration of a climate emergency and the Environmental Strategy have for the plan. It is not explained. Clarity as to the relevance of these other Council Strategies needs to be built into the plan rather than just a casual reference that they exist. <b>Para 4.4</b> As previously stated, it seems naïve to proceed with reference to just the present regulatory framework when it is well known that it is about to change. At least reference the likely direction of travel of the Government’s housing policy/requirements. <b>Para 4.5</b> We support this paragraph as it is sensible to be aware of the constraints that effect any planning decision; while there is only one registered Battlefield site there are two major battlefield sites and it would be pleasing to recognise this in this section	Comments noted.  Paragraph 4.1 of the Emerging Draft LPR makes clear that the spatial strategy sets out the overall strategy for the pattern and scale of development across the District and that has been informed by national planning policy, other plans and strategies, key pieces of the evidence base and responses to previous consultation on the LPR  For clarity, amend paragraph 4.3 of the Emerging Draft LPR as follows – ‘Key Council Strategies are reflected in the West Berkshire Vision 2036, prepared by the West Berkshire Health and Wellbeing Board, which contains five strategic aspirations: <ul style="list-style-type: none"> <li>• <u>A West Berkshire where everybody has what they need to fulfil their potential</u></li> <li>• <u>A West Berkshire with a housing mix with something for everyone</u></li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<ul style="list-style-type: none"> <li>• <u>A West Berkshire that welcomes business, enterprise and industry into a productive, growing and dynamic local economy</u></li> <li>• <u>A West Berkshire where the health and wellbeing of residents of all ages and backgrounds is good</u></li> <li>• <u>A West Berkshire with both beautiful and diverse natural landscapes and a strong cultural offering</u></li> </ul> <p><del>Including housing to meet the needs of all in the community, a productive, growing and dynamic local economy and conserving and enhancing our cultural, historic and landscape assets. A climate emergency was declared by the Council in July 2019 followed by publication of and an Environment Strategy 2020-2030, a strategic plan for the district which aims to deliver carbon neutrality by 2030 has recently been published</del></p> <p>Paragraph 4.4 of the Emerging Draft LPR - The comments relating to draft government proposals are appreciated, but as the emerging draft LPR noted, there was no certainty that the published proposals would be taken forward. In this instance, they were not.</p> <p>Paragraph 4.5 of the Emerging Draft LPR – Update figure 1 and amend the text as follows -          'West Berkshire contains a number of physical and environmental constraints which influence the location of development. <u>At a strategic level these include the North Wessex Downs Area of Outstanding Natural Beauty (AONB), which covers 74% of the District, substantial areas liable to flood, the presence of Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, a registered battlefield to the west of Newbury, various international and national nature conservation designations and the River Lambourn Nutrient Neutrality Zone as identified in Figure 1</u></p>

Respondent (with lpr ref)	Response	Council Response
		below. In addition there are other designations heritage assets, including conservation areas and historic parks and gardens which due to scale are not included in Figure 1, but which are included on the Policies Map. and.'
Thatcham Town Council (lpr1386)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p><b>Section 4.2</b></p> <ul style="list-style-type: none"> <li>"The NPPF promotes the effective use of land including re-using previously developed land, encourages higher densities in urban areas of high housing demand and refers to the need to release small and medium sized sites for development."</li> </ul> <p>We disagree that the selection of NE Thatcham reflects this statement. NE Thatcham is outside the settlement boundary, and the identified large site is rural, countryside, and high-quality agricultural land. Placing the majority of the entire housing supply on a single site is inconsistent with the NPPF policy.</p> <p><b>Section 4.3</b></p> <ul style="list-style-type: none"> <li>"conserving and enhancing our cultural, historic and landscape assets"</li> </ul> <p>We note that the North Wessex Downs AONB Board has objected to the development of all sites that make up NE Thatcham through the HELAA process.</p> <p><b>Section 4.4 – Key pieces of evidence</b></p> <ul style="list-style-type: none"> <li>scale of growth that is required during the plan period is informed by ...</li> </ul> <p>We respond to each of factors separately:</p> <ul style="list-style-type: none"> <li>.. Employment Land Review</li> </ul> <p>We note that the recommendation in this review is that office space development is recommended for Newbury and Theale. If these are to be the major new employment centres there must be evidence that access to Theale (A4 eastbound, AM Peak, and A4 westbound PM Peak) can support the traffic flow, and similarly for Newbury (A4 westbound AM Peak and A4 eastbound PM Peak).</p>	<p>Comments noted.</p> <p>Specific comments in relation to North East Thatcham are dealt with as part of the Council's response to comments made under Policy SP17.</p> <p>The Council will be undertaking a review of its Local Transport Plan following the LPR and some of the issues raised are more appropriately considered as part of that process.</p> <p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. This work also extends the plan period to 2039. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.</p> <p>The HELAA will be revised and updated and published alongside the Proposed Submission LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>We do not observe this evidence in the Traffic Flow Analysis in the evidence pack. This needs to be urgently refreshed and must reflect traffic flow pre-Covid for the reference case.</p> <ul style="list-style-type: none"> <li>.. Retail and Commercial Leisure Assessment</li> </ul> <p>We note that this assessment was prepared in 2017. We are very concerned that structural changes to retail have rendered this assessment irrelevant and that the evidence base needs to be urgently refreshed.</p> <p>Nevertheless, for West Berkshire we note that there is a stated aim from the 2012 West Berkshire Core Strategy "to achieve growth in retail activity and increase the vitality and vibrancy of town centres." Further, the 2006 strategy identified that "Thatcham town centre will be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing Thatcham town centre" (Area Delivery Plan Policy 3).</p> <p>It is clear that residential development in itself does not lead to regeneration as there has been little change to the town centre even though population has increased by 50% in the period from 1981 to 2001, and with further growth since that period. It is essential that West Berkshire assess the reasons for failure for the regeneration to understand the learnings from the 2006 strategy and what plans are in place for future development.</p> <p>We note that the assessment identified risks to retail outlook, due to various factors, including the exit of the European Union and that this would need to be monitored in the short term.</p> <p>It is important that appropriate weight is given to the recent withdrawal from the Single Market and Customs Union, its impact on GDP growth, and the purchasing power and retail demand (assuming post-Covid). Are the underlying assumptions made before leaving the EU, such as retail growth of approximately 3%, still valid? What are the implications for town centre design if this is not the case?</p> <p>We note that the 'click-and-connect' model was recognised in the retail assessment. Covid has accelerated this transition beyond that which could have been anticipated when the assessment was produced. For example, online shopping was predicted to account for just 14% (comparison goods) and 6% (convenience goods) by 2036. A peak of 15.2% was anticipated for</p>	<p>The zones (identified in the Core Strategy) shown on figure 1 will be updated to reflect the latest Detailed Emergency Planning Zone (DEPZ) and Outer Consultation Zone (OCZ).</p>



Respondent (with lpr ref)	Response	Council Response
	<p>comparison goods, and online shopping for convenience goods such as food would increase only incrementally.</p> <p>It is essential that West Berkshire consider the fundamental changes in retail patterns arising from Brexit and Covid. In our view the assessment from 2016 is now invalid.</p> <ul style="list-style-type: none"> <li>... Housing and Economic Land Availability Assessment (HELAA)</li> </ul> <p>Thattham Town Council has previously objected to developments on the sites to NE Thattham. This has not been recorded in the site assessment. Therefore, the key pieces of evidence on which the plan is based, is dated, incomplete and inaccurate.</p> <p><b>Section 4.5</b></p> <ul style="list-style-type: none"> <li>"the presence of Atomic Weapons Establishments (AWE)"</li> </ul> <p>We note that the NE Thattham falls within the AWE Outer Zone. It is essential that West Berkshire liaise with the appropriate authorities to understand the implications of a proposed major development within the Outer Zone. This is particularly important given the scale of this development, and the impact that it will have on the A4 which is likely to be part of the off-site emergency planning.</p> <p>It is necessary for the traffic forecast to represent the peak flow, and that this includes events such as motorway closures that can divert large volumes of traffic onto the A4 and hinder emergency response.</p>	
Environment Agency (lpr1657)	4.5 – Biodiversity should be included in this section on constraints, particularly regarding the protected sites, habitats and species. Although biodiversity and the AONB can also be seen as assets as well as constraints.	<p>Comments noted.</p> <p>Paragraph 4.5 of the Emerging Draft LPR – Update figure 1 and amend the text as follows -</p> <p>'West Berkshire contains a number of physical and environmental constraints which influence the location of development. <u>At a strategic level</u> These include the North Wessex Downs <u>Area of Outstanding Natural Beauty</u> (AONB), which covers 74% of the District, substantial areas liable to flood, the presence of Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, a registered battlefield to the west of Newbury, <u>various international and national nature</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>conservation designations and the River Lambourn Nutrient Neutrality Zone as identified in Figure 1 below. In addition there are other designations heritage assets, including conservation areas and historic parks and gardens which due to scale are not included in Figure 1, but which are included on the Policies Map. and.</u></p>
<b>General consultation bodies</b>		
Heritage Forum (lpr66)	<p>Support for approach</p> <p>4.5 Constraints also include the Kennet and Avon Canal, which limits transport links to those bridges across it wide enough to take a main road, and also include conservation of Greenham and Crookham Commons.</p>	<p>Support noted.</p> <p>Paragraph 4.5 of the Emerging Draft LPR – Update figure 1 and amend the text as follows -          'West Berkshire contains a number of physical and environmental constraints which influence the location of development. <u>At a strategic level</u> These include the North Wessex Downs <u>Area of Outstanding Natural Beauty</u> (AONB), which covers 74% of the District, substantial areas liable to flood, the presence of Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, a registered battlefield to the west of Newbury, <u>various international and national nature conservation designations and the River Lambourn Nutrient Neutrality Zone as identified in Figure 1 below. In addition there are other designations heritage assets, including conservation areas and historic parks and gardens which due to scale are not included in Figure 1, but which are included on the Policies Map. and.</u></p>
West Berkshire Green Party (lpr1823)	<p>In our view, climate change is the biggest issue facing this council (or any other authority, locally, nationally and internationally). It has to be the No 1 priority in everything we do if the target of carbon neutrality by 2030 is to be reached. We note Strategic Objective 1 (Climate Change) but would wish to see this go much further. New development has to make a major contribution towards this; it is no good waiting until the houses are built and then having to spend far more on retro-fitting them.</p>	<p>Comments noted. No changes are required as a result of this representation.</p> <p>Climate Change is a key strategic objective for the Local Plan Review and runs through the whole plan. Policies SP5 and DC3 of the Emerging Draft LPR set out the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>We believe that housing delivery in the current draft plan is over-reliant on large edge-of-town developments, namely Sandford and North-East Thatcham, that these are not sustainable developments in any meaningful sense of the word, and that they are incompatible with the council's environment strategy and climate change targets. As estates that would inevitably be dominated by car use, they contravene the council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in Our Vision (3.3).</p> <p>The need for these two new estates could be mitigated or eliminated by:</p> <ol style="list-style-type: none"> <li>1) Identifying more brownfield sites within existing settlements and using the joint venture with Sovereign Housing and/or the proposed WBC housing company to develop these sites, with a focus on social housing.</li> <li>2) Scaling back the office space development envisaged in the current draft, as demand is unlikely to grow on the scale envisaged in the plan, as businesses adapt to post-Covid.</li> <li>3) Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This would involve relocating the existing distribution centres to a more appropriate location closer to the motorway junctions. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</li> <li>4) Providing more rural homes, particularly affordable and social housing (rather than “executive homes”) that would enable younger families to live and work there. This would enable villages to thrive and not just become nice places for commuters to spend their evenings and weekends. In addition the windfall allowance of 140 dwellings a year in the plan is less than the historical volume. Making assumptions in line with recent years would further reduce the need for new edge of-town development. Overall, there is a perception that the draft plan concentrates on building as many homes as possible in just two areas rather than take a more imaginative, balanced and districtwide approach.</li> </ol>	<p>Council's approach to climate change and building sustainable homes and businesses</p> <p>The spatial strategy focuses development on existing settlements, using the settlement hierarchy, to meet identified needs for housing and employment. The strategy seeks to focus development on previously developed (brownfield) land within the main existing settlements, and to avoid detrimental impact on significant environmental assets including the AONB.</p> <p>The strategy includes making available housing of different types, tenures and affordability. The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries.</p> <p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. This work also extends the plan period to 2039. The update to the ELR will inform the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The plan also has an unconvincing approach to affordable housing (see comments against SP19 below).</p>	<p>LPR and will be published alongside the Regulation 19 consultation.</p> <p>The need and demand for employment land in West Berkshire remains strong. Designated Employment Areas (DEAs) are considered to represent coherent areas of employment land containing established concentrations of office, industrial and warehousing development. These areas allow business uses to locate together, complement and support one another, with relatively little disturbance to surrounding residential areas. It is therefore important to ensure the role and function of each DEA is maintained and strengthened to enhance economic growth so as to prevent their economic function being diluted and potentially compromised through amenity concerns or a lack of competitiveness.</p> <p>The Plan provides for affordable housing and different types of housing in locations across the District. Specific comments in relation to affordable housing are dealt with as part of the Council's response to comments made under policy SP19.</p>
<p>CPRE West Berkshire (lpr1698)</p>	<p><b>West Berkshire &amp; East Berkshire Combined Comments</b> We applaud the very detailed set of documents setting out a vision and development for West Berkshire to 2037. The size of the draft is a very large document that makes it difficult to assimilate in its entirety. Rather than comment on specific policies we have submitted an overview of the situation.</p> <p><b>Housing Numbers and their effect:</b> It is vital not to rush into new development so that we can ensure the infrastructure is in place and that environmental damage is prevented rather than rushing into unnecessary house building. The planned expansion needs to take account of roads, water conservation, waste disposal and energy resources as well as the social considerations. Once the infrastructure and environmental policies are in place housing can follow –</p>	<p>Comments noted. No changes are required as a result of this representation.</p> <p>The strategy seeks to focus development on previously developed (brownfield) land within the main existing settlements, and to avoid detrimental impact on significant environmental assets including the AONB. The spatial strategy takes account of existing and planned infrastructure capacity and the transport network. The proposed housing requirement reflects local housing need and can be accommodated within the District.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>not the other way round. Concentrating population in rural areas increases dependence on cars and roads and the effect this has on climate change. The AONB and rural areas need full recognition as they are vital components of “Quality of Life” with outstanding landscapes to be protected by everyone in the District and a boost to the economy. Active planning is needed for rural areas and recognition of their particular needs. Rural issues and the conservation and enhancement of nationally protected landscapes and the wider countryside should have stronger representation within the Review. Key workers and affordable housing in rural areas are not compatible with low-income households as public transport and social facilities are not as numerous as those in urban areas of West Berkshire. The use of Brownfield or previously developed land would solve the use of the destruction of greenfields and green gaps and provides an opportunity for removing some of the derelict and local eyesores to breathe new life into areas that need regeneration. A large number of sites could be transformed into the homes needed in West Berkshire.</p> <p>The Government target of 300,000 homes was based on information available from the 2014-based projections– the updated figures from ONS identify lower levels of household growth, which would reduce the number of homes required in West Berkshire and save unnecessary destruction of the green spaces. The current draft of the Local Plan proposes 8840-9775 net additional homes which is too high to be accommodated without sacrificing valuable agricultural land and land used for recreation and the housing calculations need to be reviewed. The ONS household data for 2018-2028 gives growth for West Berkshire as 2482 and with windfall sites this total is likely to be exceeded. West Berkshire is in a strong position to contest the number of housing units required with Government, especially against a backdrop of a seven-year land supply.</p> <p><b>General</b></p> <p>The WBC Local Plan consultation proposes 8,840 to 9,775 net additional homes; some 520– 575 pa. We think these figures are too high and the 'housing need' calculations need to be reviewed in the light of changing government guidance and the recent withdrawal of its 'algorithm'. Also the most recent ONS household forecast data 2018 - 2028 gives West Berkshire's growth as 2482, There is the usual range of sites put forward in</p>	

Respondent (with lpr ref)	Response	Council Response
	our towns and villages and we note WBC now has over 7-year land supply satisfying the >5 year need, and has done well with slight excess housing numbers in 2019 and 2020.	
<b>Other stakeholders</b>		
Gary Clarke (lpr701)	Events in 2020 have rewritten all the requirements for retail space with the closure of John Lewis and Debenhams in Newbury. A new approach is needed recognising how the needs and employment opportunities in the High Streets have changed.	Comments noted.  The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.  A new strategic policy relating to town and district centres will be included in the Proposed Submission LPR.
Sam Coppinger (lpr280)	Support for approach	Support noted. No changes are required as a result of this representation.
Tim Hall (lpr636)	Objection to approach The shortfall in appropriate evidence which is sufficiently current. I don't believe that the acceleration of the collapse of the retail sector (with online retail rocketing during the pandemic), although a long term trend, is reflected in the evidence. This has major implications for all town centres and will affect Newbury and Thatcham, etc. It represents an opportunity for more people to live in town centres (if suitably adapted) and to obviate the need for greenfield site development, which all right thinking people should be kept to the absolute minimum. I'm horrified by Sandford and the Thatcham NE proposal (where a specious "retail scale" argument is put forward in justification which I think covid will have run a coach and horses through).	Comments noted.  The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The Employment Land Review prepared in 2020 was updated in 2022. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of further changes in response to macro and local economic factors will be assessed through subsequent reviews of the Local Plan.
Peter Norman (lpr946)	Para 4.4 While I understand the need to have a 15 year view on planning, it seems an odd time to carry out such a review when Covid19 has as yet unknown consequences on our work patterns, home requirements and needs from a town. For example will people be working more from home or	Comments noted. No changes are required as a result of this representation. National policy requires local planning authorities to keep up-to-date local planning policies and it is necessary to regularly review the Local Plan.

Respondent (with lpr ref)	Response	Council Response
	<p>is there a need to combine housing with local work hubs that reduces the need to commute? We also have yet to see the full impact on housing requirements as such how can we be certain that the current LHN of 513 dwellings pa is correct. It would seem sensible to challenge and test this figure before building a complete strategy around it given this LPR was started before the pandemic struck.</p> <p>I would like to see a study done on new work patterns and housing needs post pandemic and an updated LHN figure in light of Covid -19 and to work our strategy for the district going forward from that.</p>	<p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The Employment Land Review prepared in 2020 was updated in 2022. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of further changes in response to macro and local economic factors will be assessed through subsequent reviews of the Local Plan.</p>
Jackie Paynter (lpr716)	<p>I believe there should be much more emphasis on providing homes, both private and for rent, for those with a lower income. These are often hard working people, but who struggle to buy or rent an acceptable home. Homes are extremely expensive compared with many in the rest of the country but pay may well be the same. This should be a priority.</p> <p>New homes are often built on 'estates' probably because it is cheaper and easier to build that way but, for most, it is not ideal. Small areas of community are much more pleasant, and normal ways to live. A village, or small areas of a town, have a wide range of age groups and types of people. They also include Village halls, small shops, allotments, play areas, wooded areas, small parks etc. These are the places that people meet others, stop, chat and interact, make friends. New Housing Estates might try to emulate this with the odd tree, bench, but it doesn't match up to village or town life.</p> <p>Changes sought:</p> <p>(This is a very long and complicated document to respond to. I will put brief comments, overall, in this Comment box)</p> <p>More homes, as mixed as possible, and in already existing communities and in small groups is preferential. Any large 'estates' should have as much community feel as possible.</p> <p>Build many more homes for low rent and affordable.</p>	<p>Comments noted. No changes are required as a result of this representation. The Plan provides for affordable housing and different types of housing in locations across the district.</p> <p>Emerging Draft LPR Policies SP5 and DC3 set out the Council's approach to climate change and building sustainable homes and businesses and Policy DC35 sets out the approach to transport infrastructure and the provision of electric charging points.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Much stronger steps on being sustainable and on consideration of the Climate Change Emergency as the most crucial issue on every aspect of the plan.</p> <p>Put a requirement of Solar panels on all new buildings wherever possible.</p> <p>Charging points in New Estates.</p>	
Paula Saunderson (lpr949)	<p>I think your evidence base is suspect and your rates of predicted growth will need a review given the effects of the pandemic on many aspects of daily life and businesses.</p> <p>The LHN looks decidedly in question given I have not managed to find any data on your Current Stock by numbers of each type and size, and where you predict the under and over supply will be that needs building to fill the gaps etc.</p> <p>The HELAA looks like lists of land offered by land owners and builders with no consideration for Water &amp; Flood Management ( for which there is not an overall strategy - unless I have missed it somewhere - GROUND WATER is a huge issue going forward.)</p>	<p>Comments noted. No changes are required as a result of this representation.</p> <p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic development, including following Britain's exit from the European Union and the Covid-19 pandemic.</p> <p>The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.</p> <p>The HELAA is a thorough assessment of land being promoted for development in the District and takes into account potential water and flood management issues.</p>
Nataliya Topliss (lpr790)	<p>West Berks council must comply with the national planning policy. This does not mean that the council must allocate most of their developments plans on Thatcham area. What about the remainder of the county? Thatcham has been neglected for decades. Nobody who is familiar with Thatcham would believe that the town could support an expansion of 2,500 new homes.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted. No changes are required as a result of this representation.</p> <p>The specific comments in relation to North East Thatcham are dealt with as part of the Council's response to comments made under Policy SP17.</p>
Councillor Tony Vickers (lpr730)	<p>As we have already said, we do not accept that the evidence base is sufficiently up-to-date. There is little or no recognition - especially with the selection of NE Thatcham as a strategic site (SP17) - that "sustainability"</p>	<p>Comments noted. No changes are required as a result of this representation.</p>



<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	<p>has taken account of Covid-19 and its likely impacts on future work and travel patterns.</p> <p>We also do not accept that the new DEPZs are necessarily excluding Grazeley. See SP3.</p>	<p>The Plan's spatial strategy has been developed following a number of rounds of consultation and engagement with communities and stakeholders and complies with national policy. Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The Employment Land Review prepared in 2020 was updated in 2022. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of further changes in response to macro and local economic factors will be assessed through subsequent reviews of the Local Plan.</p> <p>The comments in relation to Policy SP3 are dealt with as part of the Council's response to comments made under that policy.</p>
<b>Landowners, site promoters and developers</b>		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: The Spatial Areas

### (Proposed Submission LPR reference: The Spatial Areas)

Number of responses received: 17

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr725)	Support for approach. Because in the pdf para 4.6 is under Fig 1, the text saying the four areas have been reduced to three doesn't make sense on this map. Either label them as the old areas, or produce another map showing the changes in boundaries. Possibly helpful to again use the full wording for AONB acronym at the start of 4.14, but I would prefer the sentence to read 'conserve and enhance its beauty'.	Comments noted.  Amend para 4.6 of the Emerging Draft LPR as follows – '.....The four spatial areas of the West Berkshire Core Strategy (2012) have been reduced to three <u>in the LPR</u> , by combining the Eastern Area and the East Kennet Valley (as shown in figure 2)'
<b>Statutory consultees</b>		
Aldermaston Parish Council (lpr1052)	Para 4.11 Spatial Areas. APC remains of the view that it is wrong to merge the old Eastern Area with the East Kennet Valley, but note it is WBC's view to continue with this merger.	Comments noted
Cold Ash Parish Council (lpr1731)	The demarcation into the three zones is understandable, but flawed for two main reasons: Firstly it relies on a blanket designation of 74% of the land area as AONB. We have no argument at all with the principles of designating an AONB, but the sheer size of the AONB drastically reduces the space available elsewhere and places too much development pressure on the "leftover" areas.	Comments noted.  The primary purpose of AONB designation, 'to conserve and enhance the natural beauty of the area', is set out in the Countryside and Rights of Way Act 2000. Under Section 85 of the Act, the Council has a duty to have regard to the primary purpose of designation.

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	<p>Also, such a huge area will actually vary quite significantly in the quality of its landscape and views etc. Just being within the AONB does not automatically make a particular landscape area better or of special landscape quality. Secondly there are several examples of landscape in Cold Ash Parish, outside the AONB, that are just as spectacular and important, if not more so, than areas within the AONB. We provide some example photos [attached]. There would be plenty of scope for increasing development within the AONB without jeopardising its character or the identity and integrity of communities.</p>	<p>With regard to the request to re-consider the strategy and provide for more development within the AONB, the primary consideration within the AONB must be the conservation and enhancement of the natural beauty of the landscape.</p> <p>The Council's overall planning policy approach to the AONB is set out in Policy SP2. The policy is clear that the AONB will have appropriate and sustainable growth over the plan period. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR.</p> <p>Policy SP8 applies across the whole of the District. Its purpose is to ensure that development proposals are informed by an understanding of the distinctive character of West Berkshire and that this understanding is used as a positive tool in accommodating change by ensuring the inherent qualities and valued features of the District's landscape will continue to be appreciated.</p>
Holybrook Parish Council (lpr1318)	<p>'The four spatial areas of the West Berkshire Core Strategy (2012) have been reduced to three, by combining the Eastern Area and the East Kennet Valley.'</p> <p>The Parish Council is concerned about this proposal. This would create a diverse area with a mixture of urban and rural neighbourhoods. The only common factor is that they are not in the AONB and not in Newbury/Thatcham. The Council is concerned that less attention will be paid by planners to the circumstances of the urban parishes of the Eastern Urban area and that this shows a broad brush approach with more concerns shown for the ANOB and Newbury/Thatcham.</p>	<p>Comments noted.</p> <p>It is important to make clear that the conservation and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside is key to our spatial approach and remains one of the strategic objectives of the LPR.</p> <p>What is also important to recognise is that there are significant differences in character within all of the spatial areas – whether existing or proposed. The Newbury and Thatcham spatial area, for instance, contains a significant rural hinterland which includes villages such as Cold Ash and Enborne and which visibly contrasts in character with the more urban areas of Newbury and Thatcham. Similarly, in the existing Eastern Area the rural hinterland</p>

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		<p>to the north of Theale contrasts greatly with the urban areas of Calcot and Tilehurst.</p> <p>Functional relationships are also complex. Neither the Eastern Area nor the East Kennet Valley can be seen in isolation and both clearly interact with each other and with the AONB and Newbury Thatcham spatial areas too. The rural service centre of Theale currently sits on the edge of the Eastern Area but it could easily be argued that it has more in common with the East Kennet Valley. Combining the two spatial areas would therefore assist when considering the role and function of Theale in the wider context.</p> <p>In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation. In 2010, when the Core Strategy was being prepared, the Eastern Area was originally a broad area for development that included Pangbourne and a small area of the AONB running along the edge of the main urban area. However, through the Core Strategy examination process this area was reduced to exclude all parts of the AONB and so ultimately, the adopted Eastern Area is smaller than originally envisaged. This has since created challenges in delivery.</p> <p>In reality, combining the two existing spatial areas is more practical and gives the Council more flexibility in strategic planning terms.</p>
Hungerford Town Council (lpr121)	Support for approach	Support noted
Stratfield Mortimer Parish Council (lpr390)	We do not support this paragraph. It is felt that that the two distinct types of area, Reading fringe and rural villages, that make up the Eastern Area have little in common. As such it does not seem logical to have them in the same area and by implication treated in the same way as far as this local plan is concerned. Our preferred approach would be to revert to the situation in the	<p>Comments noted.</p> <p>It is important to make clear that the conservation and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside is key to our</p>

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	<p>present local plan where the two different types of area in the East of the District are treated as separate entities as far as the local plan is concerned.</p>	<p>spatial approach and remains one of the strategic objectives of the LPR.</p> <p>What is also important to recognise is that there are significant differences in character within all of the spatial areas – whether existing or proposed. The Newbury and Thatcham spatial area, for instance, contains a significant rural hinterland which includes villages such as Cold Ash and Enborne and which visibly contrasts in character with the more urban areas of Newbury and Thatcham.</p> <p>Similarly, in the existing Eastern Area the rural hinterland to the north of Theale contrasts greatly with the urban areas of Calcot and Tilehurst.</p> <p>Functional relationships are also complex. Neither the Eastern Area nor the East Kennet Valley can be seen in isolation and both clearly interact with each other and with the AONB and Newbury Thatcham spatial areas too. The rural service centre of Theale currently sits on the edge of the Eastern Area but it could easily be argued that it has more in common with the East Kennet Valley. Combining the two spatial areas would therefore assist when considering the role and function of Theale in the wider context.</p> <p>In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation. In 2010, when the Core Strategy was being prepared, the Eastern Area was originally a broad area for development that included Pangbourne and a small area of the AONB running along the edge of the main urban area. However, through the Core Strategy examination process this area was reduced to exclude all parts of the AONB and so ultimately, the adopted Eastern Area is smaller than</p>

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		<p>originally envisaged. This has since created challenges in delivery.</p> <p>In reality, combining the two existing spatial areas is more practical and gives the Council more flexibility in strategic planning terms.</p>
Thatcham Town Council (lpr1387)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p><b>Section 4.9</b></p> <ul style="list-style-type: none"> <li>"well located in terms of access to rail and to the strategic road network"</li> </ul> <p>Thatcham does not have good access to the rail station for reasons outlined previously (2.6 of full representation). The town of Thatcham, and the surrounding residential areas, are poorly connected to its station. Its location, access, and parking are sub-standard for a population centre of the size of Thatcham. This is also recognised in the Thatcham master planning work (Stage 1) that being a 1.5km walk "the station therefore does not provide easy accessibility for residents of north and west Thatcham." Further the crossing creates significant congestion, with queues approaching 1km in length, and the crossing being closed for up to 40 minutes in an hour. In effect this means that Thatcham is poorly connected to the centres to the South, and access to the station is itself constrained. It is necessary that this is acknowledged, and this statement is modified.</p> <p><b>Section 4.10</b></p> <ul style="list-style-type: none"> <li>"Newbury and Thatcham urban area is the main focus for development in the current Local Plan and will remain the focus in the Local Plan Review."</li> </ul> <p>We note that the DPD (2012) also included the statement that most new development would include 'the East of the District close to Reading'. We note that the Housing Site Allocations DPD (2006-2026) states that "Thatcham has a more modest level of facilities and has experienced rapid housing growth over the last few decades" and that "The Core Strategy does</p>	<p>Comments noted.</p> <p>The issues raised in relation to Policy SP17 are dealt with as part of the Council's response under that policy.</p> <p>Paragraph 4.9 of the Emerging Draft LPR is a brief statement providing an overview of the Newbury Thatcham area as a whole. It is acknowledged that some parts of that area will have better access to the rail and strategic road network than others.</p> <p>Paragraph 4.10 of the Emerging Draft LPR is a brief statement providing an overview of the Newbury Thatcham area as a whole. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes. The Council commissioned the <a href="#">Thatcham Strategic Growth Study</a> to inform its approach and this forms part of the LPR evidence base. This is set out in the supporting text to Policy SP17.</p> <p>The Council's overarching spatial strategy is set out in Policy SP1. It aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus will be on existing settlements, using the settlement hierarchy, set out in Policy SP3. This steers development to the most sustainable areas, with an</p>

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	<p>not, however, identify Thatcham for significant growth in this plan period due to rapid expansion in recent years."</p> <p>There has not been any significant inward investment, re-generation, nor improvement of infrastructure or services since the publication of the previous DPD and Local Plan. This Local Plan Review is therefore the opportunity to assess whether a previous approach that appears to have failed to deliver on historical objectives should be carried forward.</p> <p>The phrasing of the text implies that no such consideration has been given and should be improved.</p> <p><b>Section 4.12</b></p> <ul style="list-style-type: none"> <li>"There is significant employment provision within this area. The AWE has two major sites in this area, at Aldermaston and Burghfield and is an important provider of local jobs. There is a business park at Arlington near Theale and a number of other employment areas comprising small industrial estates."</li> </ul> <p>We agree that these are the major employment hubs. We believe that West Berkshire should encourage settlements to be located that minimise distance to work, and that have either existing good transport links or that are easily scalable.</p> <p><b>Section 4.16</b></p> <ul style="list-style-type: none"> <li>"delivery of up to 2,000 homes over the period 2006 – 2026"</li> </ul> <p>This statement is not relevant for the period to 2037 for which this consultation is being conducted.</p> <ul style="list-style-type: none"> <li>"Hungerford, Lambourn, Compton and Hermitage have designated neighbourhood areas for the preparation of Neighbourhood Plans. Additional development for the period beyond 2026 will therefore be limited and will come in part through allocations within NDPs".</li> </ul> <p>We do not understand why development beyond 2026 need be limited. The Local Plan sets out a vision to 2037, and the NDP should conform with, and not promote less development as defined in section 1.16.</p> <p>It is essential that this Local Plan does not use guidance that is dated to restrict its ability to meet future housing supply beyond 2026.</p>	<p>appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity, while protecting and enhancing the environmental assets of the District.</p> <p>Newbury and Thatcham are the largest settlements in the District and it is appropriate that the focus for development should be here. The Eastern Area is very constrained, with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston.</p> <p>The LPR covers the 15 year period to 2039 and so it is relevant that it considers the delivery of housing to 2026 as part of that. The Council's strategic approach to the delivery and distribution of housing is set out in policies SP1, SP3, SP12, SP13, SP14 and SP15. A Housing Background Paper will be prepared to accompany the Proposed Submission LPR.</p>

Respondent (with lpr ref)	Response	Council Response
<b>General consultation bodies</b>		
Heritage Forum (lpr67)	Support for approach 4.10 Since 4.11 includes a reference to the Kennet & Avon Canal, there should be a similar reference in 4.10.	Comments noted.
Reading West Berkshire Labour Party (lpr1177)	<p>We are concerned about the proposal to merge the Eastern Urban Area with the current Eastern Area to create a new Eastern Spatial Area. This would create a diverse area and a mixture of urban and rural neighbourhoods. The only common factor is that they are not in the AONB and not in Newbury/Thatcham. We are concerned that less attention will be paid by planners to the circumstances of the urban parishes of the Eastern Urban Area and that this shows a broad brush approach with more concern shown for the AONB and Newbury/Thatcham.</p> <p>Changes sought: To retain the existing Spatial areas</p>	<p>Comments noted.</p> <p>It is important to make clear that the conservation and enhancement of the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside is key to our spatial approach and remains one of the strategic objectives of the LPR.</p> <p>What is also important to recognise is that there are significant differences in character within all of the spatial areas – whether existing or proposed. The Newbury and Thatcham spatial area, for instance, contains a significant rural hinterland which includes villages such as Cold Ash and Enborne and which visibly contrasts in character with the more urban areas of Newbury and Thatcham. Similarly, in the existing Eastern Area the rural hinterland to the north of Theale contrasts greatly with the urban areas of Calcot and Tilehurst.</p> <p>Functional relationships are also complex. Neither the Eastern Area nor the East Kennet Valley can be seen in isolation and both clearly interact with each other and with the AONB and Newbury Thatcham spatial areas too. The rural service centre of Theale currently sits on the edge of the Eastern Area but it could easily be argued that it has more in common with the East Kennet Valley. Combining the two spatial areas would therefore assist when considering the role and function of Theale in the wider context.</p> <p>In strategic planning terms the existing Eastern Area is now very small and is very difficult to plan for in isolation.</p>



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		<p>In 2010, when the Core Strategy was being prepared, the Eastern Area was originally a broad area for development that included Pangbourne and a small area of the AONB running along the edge of the main urban area. However, through the Core Strategy examination process this area was reduced to exclude all parts of the AONB and so ultimately, the adopted Eastern Area is smaller than originally envisaged. This has since created challenges in delivery.</p> <p>In reality, combining the two existing spatial areas is more practical and gives the Council more flexibility in strategic planning terms.</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr281)	Support for approach Development with AONB must be sympathetic and not too impactful. We accept houses are needed but all other land options should be considered first.	Comments noted
Tim Hall (lpr637)	Support for approach. Seems logical	Support noted
Peter Norman (lpr957)	<p>4.6 Spatial areas. The spatial area of Greenham makes no sense. Land to the west of the A339 has no connection to Greenham and should reflect the diocese borders where west of A339 and south of and including Monks Lane should properly be considered Wash Common. This would provide the opportunity for this community to develop their own local plan which at the moment is impossible as it would require acceptance of Sandleford as a Strategic site for housing development</p> <p>4.10 The battleground in South Newbury should also be recognised as a designated historical site that would be inappropriate for development. In addition the objective here should be the development of brownfield sites in preference to greenfield sites where ever possible</p> <p>4.16 Notes that for this area the planning inspector in his review of the 2006-2026 Core Strategy that there should be a maximum of 2,000 new homes in this area, but no such limits have been put on the other districts covered in</p>	<p>Comments noted.</p> <p>Parish boundaries are not a matter for the Local Plan.</p> <p>Emerging Draft LPR Policy DC12 sets out the Council's approach to proposals that could affect the Registered Battlefield which extends south to the west of Wash Common along Enborne Street.</p> <p>Policy SP1 sets out the overall spatial strategy for the District. This makes clear that the strategy seeks to make effective use of brownfield land and notes that opportunities for this are greatest in those settlements at</p>

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	<p>the LPR. This states by implication that there is no limit to the housing that can be built in the other areas. This is patently absurd given the physical constraints of the district and I would like to see a study undertaken as to what is the maximum number of homes that can be reasonably be built and supported across the entire district and especially its two main towns given the explosion in growth (+10,500 new homes) built in the preceding period</p> <p>Changes sought:</p> <p>4.6 For a district of Wash Common to be created that recognises the particular requirements and strong community of this area.</p> <p>4.10 Ensure the battleground in South Newbury is designated</p> <p>4.10 Amend final sentence to: there are also opportunities for brownfield development, particularly in Newbury, that should be considered before the allocation of additional greenfield sites</p> <p>Amend section to include a maximum number of homes for all areas of the district following a study as to what can be supported with a reasonable build out of infrastructure</p>	<p>the upper levels of the settlement hierarchy, particularly Newbury.</p> <p>Policy SP12 sets out the Council's approach to the delivery of housing across the District and this will be supported by a Housing Background Paper.</p>
Ian Parsons (lpr825)	<p>The division of the county into three areas is agreeable.</p> <p>Public transport around the AONB remains problematic with parish councils often heavily subsidising local bus companies. A return to a council run bus company covering the AONB would be welcomed. Reading's bus company is a shining example of this approach.</p>	<p>Comments noted</p> <p>It is recognised that many rural parts of the District have no, or a very minimal bus service. The Council has recently published a Bus Service Improvement Plan, which outlines that Demand Responsive Transport options are being investigated for rural areas where there are no bus services (e.g. between Hungerford and Lambourn).</p>
Paula Saunderson (lpr951)	<p>Looking at the map it would seem to me that West Berkshire as an administrative area would be better split into the many LA areas that surround it, and consideration should be given to disbanding it as a small Unitary Authority and whether the Communities it serves would be better served by the other LAs near to them. Having it stuck out like a sore thumb on the end of the M4 Corridor probably means the spatial areas defined within your plan are more for convenience than for the benefit of the communities. WBC never looks to the South, West &amp; North, always looking East and that approach does not always benefit the population.</p>	<p>Comments noted.</p> <p>Comments in relation to the appropriateness of West Berkshire as an administrative area fall outside the scope of the LPR.</p> <p>The LPR is being produced through close partnership working with all our neighbouring local authorities to ensure that cross-boundary planning issues are being taken into account. The Council has a statutory</p>

Respondent (with lpr ref)	Response	Council Response
		Duty to Cooperate in this regard and key work takes place on an ongoing basis. A Duty to Cooperate Statement will accompany the Proposed Submission LPR.
Nataliya Topliss (lpr792)	<p>The development of 2,500 homes in the north east of Thatcham will make the lives of the existing residents of Thatcham much worse. It will put excessive strain on our infrastructure and services: the railway crossing, traffic congestion, roads, doctors surgeries, libraries, open and green spaces. Before pandemic, congestions on the A4 and other roads leading out of town is astronomical. It took me up to two hours one way to get to Reading from Thatcham daily. The road network in and around Thatcham cannot cope. No new roads and rail bridges have been built. The trains are always overcrowded. Before Covid pandemic, it was impossible to get to a train station by a car as all roads were congested. Residents of Thatcham are living in hell. There are no local jobs and it is next to impossible to travel to other towns due to congestions on the roads.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted.</p> <p>The issues raised relate to Policy SP17 and so are dealt with as part of the Council's response under that policy.</p>
Councillor Tony Vickers (lpr731)	<p>We agree with the reduction from 4 to 3 Spatial Areas. However as noted already we don't agree with the statement in 4.9 which implies that the whole Newbury &amp; Thatcham urban area in "well connected" to the strategic road network.</p> <p>Modify 4.9 in respect of Thatcham.</p>	<p>Comments noted.</p> <p>Paragraph 4.9 of the Emerging Draft LPR is a brief statement providing an overview of the Newbury Thatcham area as a whole. It is acknowledged that some parts of that area will have better access to the rail and strategic road network than others.</p>
Ian Watson (lpr689)	<p>Support for approach The importance of public transport provision is recognised. Travel to Thatcham station by public transport is very difficult with very few buses and poor timetables. More housing may lead to more commuters and</p>	<p>Comments noted.</p> <p>Improving access to and improving facilities at Thatcham railway station is likely to be a key project. It is recognised that as well as improving active travel to the station, access by bus and improvements car parking are also</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	in normal time parking at or near the station is already difficult. Maybe some form of peak rail travel time shuttle bus is needed?	considered. Any package of enhancements would also need to make the station more accessible for all who wish to travel. The Council has a good record of working with the rail industry (especially GWR) and local communities to develop and deliver such projects, such as those currently being delivered at Newbury and Theale stations.
<b>Landowners, site promoters and developers</b>		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP1 Spatial Strategy

### (Proposed Submission LPR Policy: SP1 Spatial Strategy)

Number of responses received: 75

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr727)	<p>Minor formatting comment but it matters when people search documents digitally. Please could you decide whether spaces are included or not in the policy references - ie keep it as SP1 throughout, not both SP1 and SP 1. Same issue has happened with other RSA references.</p> <p>I'd like to understand the total scoring systems for environmental value (where is lower apart from outside the AONB). As mentioned previously, don't like the three-part concept of 'built, historic and natural' environment, please just use the NPPF terms that people can easily cross-reference.</p> <p>Para 4.19 brownfield land can have archaeological interest (almost by definition).</p>	<p>Comments noted.</p> <p>The formatting of policy references will be corrected.</p> <p>The NPPF states that one of the three overarching objectives of the planning system is to protect and enhance our natural, built and historic environment. Paragraph 20 of the NPPF requires strategic policies to make provision for conservation and enhancement of the natural, built and historic environment. The wording of the policy is therefore consistent with terms used in the NPPF and no changes are required to the policy in this regard.</p> <p>It is recognised that brownfield land can have archaeological value. Any development proposal would need to be assessed against all relevant Local Plan policies.</p>
<b>Statutory consultees</b>		

Respondent (with lpr ref)	Response	Council Response
Chieveley Parish Council (lpr1718)	Chieveley Parish Council supports the overall spatial strategy and principles underlying new housing allocations in the AONB.	Comments noted.
Cold Ash Parish Council (lpr1740)	<p><b>The treatment of Cold Ash Parish</b></p> <p>It has been accepted by West Berkshire District Council that Cold Ash Parish is in a quite unique position. This can be explained by the fact that it has been placed within the same spatial area as Thatcham and Newbury and has also been recognised as a service village. This leaves it in a confusing position, as the development expectations of each are quite different; the Thatcham and Newbury spatial area has higher development density expectations, whilst service villages are "smaller rural settlements" that "may offer some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs". Also, part of the parish is in the North Wessex Downs AONB. The plan doesn't balance this dichotomy, as the allocated number of houses is significantly higher than similar service villages, even though there are already c100 dwellings due to be built in response to the DPD.</p> <p>Also, Cold Ash village is strategically placed between Thatcham and the strategic road network of the M4 and A34. This results in a high volume of transit traffic through the parish, which would be greatly exacerbated by the building of up to 2,500 houses in the North East Thatcham Strategic Site. It needs to be borne in mind that the parish's road network is predominantly made up of adopted tracks, many without pedestrian paths.</p> <p>It's clear that the landscape, character and distinctiveness of Cold Ash is very important to its parishioners. It also provides a valuable flow between the urban areas of Thatcham and Newbury, to the south, and the rural landscape and AONB, to the north, due to its balanced blend of sensitive housing and semi-rural road network, and an appropriate amount of green space. As such, any overdevelopment or urbanisation, with excessive housing and an upgraded road network, is likely to destroy the nature, character and distinctiveness of the area, which will be a loss not only for the parishioners of Cold Ash, but also to those of the surrounding areas, both urban and rural.</p> <p><b>Summary</b></p> <p>Cold Ash Parish Council acknowledges the hard work that has gone into the production of the Local Plan Draft through periods of political uncertainty and</p>	<p>Comments noted.</p> <p>The NDP for Cold Ash will cover the parish area. The parish does partly fall within the AONB although the majority is within the Newbury and Thatcham spatial area. Small parts of the parish also lie within the Newbury and Thatcham settlement boundaries (both of which are identified as 'urban areas' in the settlement hierarchy). The number of dwellings proposed for Cold Ash therefore relates to an area significantly wider than the service village of Cold Ash.</p> <p>The indicative housing requirements (as set out in the draft emerging LPR) for the designated Neighbourhood Areas took into account the development opportunities identified within the HELAA, the placing of settlements within the settlement hierarchy, and constraints such as the AONB.</p> <p>A number of potential opportunities were identified in the HELAA, with site selection work undertaken by the NDP Steering Group since publication of the Emerging Draft LPR showing there is one site suitable for potential allocation in the Parish. However, as this site is located within the settlement boundary of Newbury, where there is a presumption in favour of development, policy SP1 will be amended as follows:</p> <p>'Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b></p>

Respondent (with lpr ref)	Response	Council Response
	<p>recently the corona virus disruption. We would particularly like to highlight the role played by the Planning Policy Team who have engaged with us over the last 18 months and thank them for their diligence and responsiveness. The Plan is by its nature complex and wide-ranging and there is much in it that we support, particularly from a more general perspective – for instance references to the importance of combating climate change, biodiversity and maintaining the character and identity of settlements and communities. However, we believe there are some fundamental flaws in the Plan, most especially its spatial and development strategies being too skewed to protecting the AONB, and its lack of recognition of the unique situation and challenges facing our parish, resulting in an over-allocation of dwellings here. We ask WBC to consider carefully all the points raised in this response, but particularly draw your attention to the following key items:</p> <ol style="list-style-type: none"> <li>1. We object to the number of 40 dwellings allocated to our Parish and ask WBC for a fairer, lower allocation akin to Lambourn or</li> <li>2. We urge WBC to reconsider the Spatial Strategy and amend it to provide for greater (but still contained) development within the huge 74% of land within the AONB.</li> <li>3. We strongly recommend a re-think and scaling back of the THA20 development to a sustainable number, both for Thatcham itself and neighbouring parishes such as ours.</li> <li>4. We ask WBC to ensure that the Local Plan: <ol style="list-style-type: none"> <li>1. formally acknowledges Cold Ash Parish’s unique situation within the District</li> <li>2. confirms that WBC will not allocate any strategic sites within our</li> </ol> </li> <li>5. We request that WBC facilitate further additional processes of engagement between parishes regarding THA20.</li> </ol>	<p>.....  <del>New allocations for housing for Cold Ash will be made through a NDP. ....’</del></p> <p>The key issues for Cold Ash are noted. With regard to the request to re-consider the strategy and provide for more development within the AONB, the primary consideration within the AONB must be the conservation and enhancement of the natural beauty of the landscape.</p> <p>Responses to comments on the North East Thatcham proposal are set out in the responses to SP17 and traffic modelling will consider the impact on roads through the parish.</p>
Hermitage Parish Council (lpr1820)	<p>Hermitage Parish Council, along with many Hermitage residents objects to the 20 additional dwellings proposed for the parish. In the last 15 or so years the number of dwellings has increased by 36% to 786 or 42 % if all those currently in the planning process are included. It is understood that this community has absorbed one of the greatest increases in homes in the area, second only to Cold Ash.  The perception is that Hermitage will soon cease to be a village.</p>	<p>Comments noted.</p> <p>A NDP is being prepared for Hermitage, and the designated Neighbourhood Area (the area that the NDP will cover) encompasses the Parish area. At the time of the consultation on the draft emerging Local Plan Review,</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It believes that the number of additional dwellings allocated to service villages in the ANOB should take into consideration the number of dwellings recently added or allocated in the current DPD to them. If a parish has had a great deal of development in recent years, it should not have more foisted on it.</p> <p>Changes sought:</p> <ol style="list-style-type: none"> <li>1. A reduced number of dwellings for Hermitage.</li> <li>2. Fairness in the way additional dwellings are allocated to service villages in the ANOB.</li> </ol> <p>The council does realise this is partially affected by the availability of brown field sites and points out that there are no brownfield sites left in Hermitage.</p>	<p>Hermitage had identified that the NDP would include allocations for residential development.</p> <p>The indicative housing requirements (as set out in the draft emerging LPR) for the designated Neighbourhood Areas took into account the development opportunities identified within the HELAA, the placing of settlements within the settlement hierarchy, and constraints such as the AONB.</p> <p>Hermitage NDP Steering Group advised the Council in February 2022 that they no longer intended to include allocations in the NDP. Site allocations in Hermitage will now be considered through the LPR.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3. Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints. The primary consideration within the AONB must be the conservation and enhancement of the natural beauty of the landscape. The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>
Holybrook Parish Council (lpr1319)	<p>Within Newbury, Thatcham, Tilehurst, Purley-on-Thames and Calcot developments are expected to secure a net density of at least 35 dwellings per hectare.’ (p17) continues with ‘with densities of at least 70 dwellings per hectare in town centres and for flatted developments along main transport routes and close to transport nodes’.</p> <p>This proposed ‘expected’ minimum density is too high and of great concern especially regarding developments close to and feeding into the A4 Bath Road not only from Junction 12 of the M4 but also from Tilehurst and</p>	<p>Comments noted.</p> <p>Efficient use of land is a government priority and will reduce the need to build on greenfield sites. The policy does include the flexibility for justification of lower densities depending on site specific issues.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Burghfield. Densities of this magnitude will lead to immense pressure on already over stretched services.</p> <p>The Emerging Local Plan encourages more development in an area where traffic levels are dangerously close to saturation and infrastructure simply has not kept pace. The local plan should do more to protect these areas from over development and complete collapse through lack of sufficient infrastructure.</p> <p>HPC and its residents have made many unheeded representations to West Berkshire Council in respect of high density development, traffic and infrastructure impact. Our residents face a regular battle with these ever increasing issues.</p> <p>'The individual identities of the separate settlements within this area [Eastern Area] will be maintained and the high quality landscape and environmental assets in this part of West Berkshire will be conserved and enhanced.' (p. 19)</p> <p>Whilst it is extremely important that the individual identities between areas are maintained it must not be forgotten that 'there is interaction within and between all the spatial areas' (Section 4.6) and the effect of development in other areas can and does directly impact its neighbours. For example, the proposed development at Pincents Hill, which has received many objections from Tilehurst residents, has also seen a significant number of objections from Holybrook residents as it is our residents who will suffer greatly from the increased traffic for example.</p> <p>Holybrook Parish Council supports many of the idealistic policies within the emerging Local Plan which demonstrate West Berkshire Council's commitment to provide the required housing stock in a way that enhances and protects existing localities within its district. However, distinct areas, such as Holybrook, have been ignored and this takes away their identity. The Parish of Holybrook has found that, in practice, the wording within policy documents does not always marry with the reality of what developers produce. Our Parish has been subjected to many developments in the recent years resulting in the loss of distinction, loss of habitat and loss of green space all whilst our infrastructure has been put under immense pressure and is close to collapse.</p>	<p>Transport modelling will form an important part of the evidence base and applications will need to mitigate any impact on local transport networks and the strategic road network, as outlined in policy SP22.</p> <p>The policies of the Local Plan need to be read together in the consideration of any development proposal. Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of policy SP7. The supporting text notes that '<i>New development should begin with an understanding of an area's existing character and context and its design should evolve from West Berkshire's high quality and diverse landscape character and rich built and cultural heritage. Development should complement and enhance existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed.</i>'</p>

Respondent (with lpr ref)	Response	Council Response
	The local plan should do more to protect these areas [where traffic levels are near saturation and infrastructure is lacking] from over development and complete collapse through lack of sufficient infrastructure.	
Hungerford Town Council (lpr122)	We welcome the explicit support for NDPs to play a key role as part of the planning strategy	Support for the policy noted.
Lambourn Parish Council (lpr1443)	N.B. Lambourn NDP are not seeking to make allocations for housing	<p>Comments noted.</p> <p>It is acknowledged that since making those comments the NDP Steering Group has stated that it will be allocating housing through the NDP.</p> <p>Nevertheless, further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows:</p> <p>'Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b> ..... New allocations for housing for Cold Ash will be made through a NDP. ....</p> <p><b>Eastern Area</b> .... <del>New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</del></p> <p><b>North Wessex Downs AONB</b> .... Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.'</p>

Respondent (with lpr ref)	Response	Council Response
Lambourn Neighbourhood Development Plan Steering Group (lpr1703)	The Lambourn NDP is not at this time planning to allocate sites for housing. The sites already allocated by WBC (RS19 and RS20) together make provision for 65 of the 90 houses deemed to be needed to meet housing demand in Lambourn. We anticipate the remaining 25 may be found by natural development/windfall. Our policies on this are still emerging, but we are looking to designate Green Space and to produce Local Policies and Design Codes for housing development within which such natural development can take place.	<p>Comments noted.</p> <p>It is acknowledged that since making those comments the NDP Steering Group has stated that it will be allocating housing through the NDP.</p> <p>Nevertheless, further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows:</p> <p>'Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b> ..... <del>New allocations for housing for Cold Ash will be made through a NDP. ....</del></p> <p><b>Eastern Area</b> .... <del>New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</del></p> <p><b>North Wessex Downs AONB</b> .... <del>Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.'</del></p>
Newbury Town Council (lpr2272)	We agree with the policy – but with a changed proposed. The Spatial Strategy is well balanced, apart from not recognising that it may be necessary to allow some high-density housing within Designated Employment Areas that need modernisation and redevelopment in order to make such redevelopment economically viable.	<p>Comments noted.</p> <p>Designated Employment Areas are considered to represent coherent areas of employment land containing established concentrations of office, industrial and warehousing development. These areas allow business</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It seems odd that the LPA is aware that one promoted housing site within a Newbury DEA already has the benefit of planning consent on part of its area for several years' worth of 'windfall allowance', yet this does not feature anywhere in the calculations of housing need and the assessment of overall windfall allowance in the Plan Period takes account only of 'small sites' of less than 10 dwellings.</p> <p>We particularly welcome the supporting text in 4.18, where it refers to "maintaining vibrant and balanced communities" and "opportunity to reduce out-commuting and the need to travel". This applies as much to service villages in the AONB as elsewhere. The post-Covid environment is likely to mean that even those whose jobs notionally are based outside their home area – or even outside the District – will be able and willing to travel less for work purposes, because working from home for at least part of the time will remain the norm. It is largely for this reason that we wish the Local Plan to be more flexible about new developments of all kinds in and adjacent to the AONB. However, we see no need to amend SP 1 in this respect.</p>	<p>uses to locate together, complement and support one another, with relatively little disturbance to surrounding residential areas. It is therefore important to ensure the role and function of each DEA is maintained and strengthened to enhance economic growth so as to prevent their economic function being diluted and potentially compromised through amenity concerns or a lack of competitiveness.</p> <p>Presumably Newbury Town Council are referring to the London Road Industrial Estate in Newbury, where there is a permission for 160 residential units on Land off Faraday and Kelvin Road. The calculation of housing need takes no account of sites – it is based on household projections with an uplift based on local affordability. The housing supply, however, includes these 160 units as outstanding permissions. The windfall allowance is for sites that are not yet permitted or even identified.</p> <p>Comments regarding development in the AONB are noted. However, the conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of development proposals in the AONB.</p>
Shaw-cum-Donnington Parish Council (lpr195)	<p>We note the claim that "Demand for travel will be managed". We do not understand how this will be achieved. Currently we see the bus services declining over the years and the demand for car travel remaining to meet people's needs. The investment in cycle travel has not achieved much if the observed use of recently installed cycle lanes is to be believed. So what is intended to be done in the light of progress so far?</p> <p>4.17 We note again the text "development that will meet social and economic need of the District". We refer to our previous comment in 1.5. (lpr191 on Introduction and Background)</p>	<p>Comments noted.</p> <p>The policies in the Emerging LPR need to be read together. Policy SP22 outlines requirements for Transport Assessments, Transport Statements and Travel Plans, with the aim of encouraging sustainable travel and improving travel choice.</p> <p>The strategy seeks to plan for people to live in places where there are local facilities and services so that the need to travel is reduced.</p>

Respondent (with lpr ref)	Response	Council Response
Stratfield Mortimer Parish Council (lpr391)	<p>We support this policy overall but have the following reservations: The general thrust of the policy to make the best use of land and to direct development to areas of lower environmental value makes sense and is in line with government guidelines. However, many of the statements are vague and it would seem that the policy can be satisfied by having a brief that just says the correct things rather than actually meets the intent of the policy.</p> <p>For instance, what does this statement actually mean? “optimises the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment” Optimise means to make the best use of and hence can be read as meaning to maximise the density of development. On the other hand, the conserving and enhancing clause can be read to mean the exact opposite.</p> <p>There are several more such statements in SP 1 such as: - “Density on individual sites will vary according to their location and context, size of developable area and site-specific issues such as shape and access”.</p> <p>This is so broad that it is almost not worth having in the document, although the assumed thought behind the words is to be applauded.</p> <p>And yet the next section has the statement that: - “Within other defined settlements developments are expected to secure a net density of at least 30 dwellings per hectare with higher densities achievable in the centres of Hungerford, Pangbourne and Theale.”</p> <p>This density maybe at odds with the surrounding home/building densities and therefore out of character. Plans are to review boundaries. If a boundary is extended the presumption in favour will apply with potential higher densities. This could be in conflict with</p> <ul style="list-style-type: none"> <li>o - “Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings”</li> <li>o - surrounding homes/building density</li> </ul> <p>This also seems to impose an overarching standard which is contradictory to the previously highlighted quote.</p> <p>The plan also states: -</p>	<p>Overall support for the policy noted.</p> <p>Policy SP1 is an over-arching strategic policy. The policies of the Local Plan need to be read together in the consideration of any development proposal.</p> <p>Efficient use of land is a priority and the policy sets out density expectations in different parts of the District. But each site will have site specific constraints including size and shape of site together the character and amenities of the surrounding area. These may well justify lower densities for particular sites or locations.</p> <p>Regarding the suggestion to allow higher densities on brownfield land, the policy does not set a maximum density. Design quality is covered in Policy SP7. Any design codes and policies in adopted NDPs will still apply.</p> <p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain’s exit from the European Union and the Covid-19 pandemic. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>“Employment development to meet the existing and future economic demands for business use will be directed to Designated Employment Areas, to help promote sustainable patterns of development, prioritise the use of previously developed land and support the retention of these areas for employment uses”.</p> <p>Bearing in mind the change in work patterns highlighted by the pandemic, does this policy need revising? Is there not now a need for more small-scale, dispersed/local employment opportunities?</p> <p>Changes sought:</p> <p>Clarity and measurability for all these policies rather than woolly words that can be interpreted in so many different ways.</p> <ol style="list-style-type: none"> <li>Note allow higher densities on brownfield (redevelopment) sites; suggest density should be subject to local situation and agreed design codes must comply with local design codes particularly those in made NDPs etc.</li> </ol> <p>Eastern area p19 “individual identities of the separate settlements within this area will be maintained and the high-quality landscape and environmental assets in this part of West Berkshire will be conserved and enhanced.” ‘to meet local needs and maintain vibrant and balanced communities with their own sense of identity’ (text para 4.18)</p> <p>This policy strongly supported to maintain distinctiveness and quality landscapes.</p>	
Thatcham Town Council (lpr1388)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <ul style="list-style-type: none"> <li>"Outside of settlement boundaries land will be treated as open countryside where development will be more restricted."</li> </ul> <p>The proposed area of THA20 is countryside which has restricted development according to existing settlement boundaries. The policy appears to contradict with the selection of the strategic NE Thatcham site.</p> <ul style="list-style-type: none"> <li>"Thatcham ... net density of at least 35 dwellings per hectare"</li> <li>"Developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings."</li> </ul>	<p>Comments noted.</p> <p>The settlement boundaries are proposed to be amended through the LPR and will include new allocations. The area to the north east of Thatcham that is included within the settlement boundary will therefore no longer be considered as open countryside in policy terms.</p> <p>Efficient use of land is a government priority and will reduce the need to build on greenfield sites. The policy does include the flexibility for justification of lower densities depending on site specific issues.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>These statements are inconsistent. NE Thatcham is outside the existing settlement boundary and defined as countryside. To maintain consistency with similar rural areas a density of 30 dwellings would be implied. More generally, the housing density appears to be based on legacy planning assumptions. We believe it is important that West Berkshire assess whether such densities remain valid when designing residential layouts aligned with net-zero carbon. For example, orientation of buildings may become more constrained to maximise solar gain and avoid shadowing, and land may require to be set aside for renewable energy generation for offsetting purposes.</p> <ul style="list-style-type: none"> <li>• "Demand for travel will be managed, and accessibility to sustainable transport opportunities increased through improving choice in transport modes."</li> </ul> <p>We agree that where possible a choice should be offered to support active travel.</p> <p>Nevertheless, we believe it would be a mistake to put too much weight on active travel as a traffic congestion solution. Even for those residents that embrace active travel it cannot be assumed to be suitable for many journeys, or most of the time. Further, active travel is seasonable and will be less popular during winter months, and periods of ice or snow, or rain. For this reason, it cannot be used to substitute for critical infrastructure and in the absence of other evidence traffic assessment must be based on existing known traffic models (pre-Covid).</p> <p>We do not believe it is possible to manage travel demand, as the policy implies. Traffic demand will be based on personal choice, and depend on economic growth, labour markets and affordability of private vehicles. The Department of Transport predicts (2018), in all its scenarios, that traffic growth will increase. It is important that the policy does not imply that demand is managed or make unfounded assumptions that traffic demand will decrease.</p> <p>It is essential that active travel should not be used to reduce traffic flow forecasts as these must be dimensioned for peak traffic which will occur during busy periods, and when Motorway diversions are in place (particularly if it impacts emergency planning response for AWE).</p>	<p>Support for active travel choices is noted. The policies in the Emerging LPR need to be read together. Policy SP22 outlines requirements for Transport Assessments, Transport Statements and Travel Plans, with the aim of encouraging sustainable travel and improving travel choice. Transport modelling will form an important part of the evidence base and applications will need to mitigate any impact on local transport networks and the strategic road network, as outlined in policy SP22.</p> <p>Comments specific to the North East Thatcham proposal are covered in the responses on SP17.</p> <p>Regarding the description of Thatcham as a focus for new housing and improved provision of services and facilities, the development of an urban extension to the north east will help boost economic activity in the town and provide opportunities for both existing and new businesses.</p> <p>The NPPF is clear that NDPs should not promote less development than set out in strategic policies of the Local Plan but that development can come forward via Neighbourhood Plan allocations without needing to be allocated in the Local Plan. Neighbourhood Plans have to be in general conformity with the Local Plan and, alongside the LPR, will form part of the development plan. Appendix 8 of the LPR will also make clear how the LPR policies will be applied in the context of NDPs.</p> <p>The purpose of the planning system is to contribute to the achievement of sustainable development. Broadly this can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. There are three overarching objectives economic, social and environmental.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>"environmental assets will continue to be protected and enhance to establish a distinctive sense of place that nurtures human health and wellbeing."</li> </ul> <p>The proposed development of NE Thatcham will result in a loss of accessible countryside to the neighbouring urban areas of Thatcham, removes the green boundary to the existing well establishment settlement boundary, and has significant ecology and biodiversity implications. This reduced access to countryside is detrimental to well-being, and therefore the proposed development is in conflict with this policy.</p> <p>It is essential that the policy assesses the needs of existing residents, their health and well-being, and that this is reflected in the policy. The policy will need to be amended to reflect the inconsistency with selection of NE Thatcham with this statement.</p> <ul style="list-style-type: none"> <li>"Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities."</li> </ul> <p>There is no supporting text for this statement, and therefore it is not possible to understand the meaning of the word 'regeneration' in this statement. The same words have been used from the previous DPD that dates to 2008 and referred to the town centre. However, since the 2008 DPD there has been increasing encroachment of residential development around the town centre, and the recent development by McCarthy &amp; Stone reduces space for the town-centre to expand.</p> <p>The Draft Local Plan was published for consultation with a statement that the IDP would be published in week beginning 14th December. The lack of any supporting text, or the publication of the IDP means that there is no evidence to support this statement.</p> <p>We believe that statements that define policies should be backed up with evidence. We find no reference to substantiate this statement in either this policy (SP 1) or policy (SP 17). It is important that supporting text, or evidence, is provided that explains this specific text.</p> <ul style="list-style-type: none"> <li>"urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure."</li> </ul> <p>We note that the existing public right-of-way access serves as important access to the existing countryside. Over 90% of residents that have</p>	<p>Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>The SA will be updated to reflect any recent legal and policy requirements and the Infrastructure Delivery Plan will be published with the Reg.19 consultation.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>contacted our Town Councillors value the protection of the existing rural countryside, and that the overwhelming majority are not in favour of development.</p> <p>It is important that the policy recognises the loss of green space to existing residents.</p> <ul style="list-style-type: none"> <li>• "New allocations for housing for Cold Ash will be made through an NDP."</li> </ul> <p>We are unclear as to the priority of an NDP. It is stated elsewhere that "Neighbourhood plans should not promote less development than set out in the Local Plan" yet under this policy the Cold Ash NDP appears to take precedent.</p> <p>It appears to be inconsistent that NDP that are not yet published are being given priority over a Local Plan. The policy should define the legal status of NDP's that are not yet published.</p> <ul style="list-style-type: none"> <li>• "Newbury and Thatcham will remain the focus for business development, with Newbury the main focus for office development."</li> </ul> <p>This statement reinforces the low availability of office space in Thatcham, and that future economic growth and inward investment is targeted for Newbury. This is inconsistent with statements elsewhere regards managing traffic demand, Thatcham re-generation, and delivering inward investment in Thatcham.</p> <ul style="list-style-type: none"> <li>• "Tilehurst and Burghfield will be made through NDPs. ... Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs."</li> </ul> <p>As per previous comment, we are unclear as to the priority and legal status of undefined NDP, and whether these NDP's are valid to the period of 2026, or include the period between 2026-2037.</p> <p><b>Section 4.17</b></p> <ul style="list-style-type: none"> <li>• "Principles which underlie spatial strategy stem from overriding objective of enabling sustainable development."</li> </ul> <p>It is unclear as to what exactly is the definition of sustainable in this context. We note that NE Thatcham site is only poorly related to the target economic and employment growth centres.</p> <p>We provide further comments on the Sustainability Assessment in our response to policy SP 17.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><b>Section 4.18</b></p> <ul style="list-style-type: none"> <li>".. protecting and enhancing the environmental assets of the District. The existing urban areas are regarded as the most suitable locations"</li> </ul> <p>The NE Thatcham site is classed as countryside, as described in the Council's position to the Secretary of State (2016, Siege Cross). This creates a conflict between the selection of the site and the policy. It is necessary for the plan to address this conflict.</p> <p><b>Section 4.19</b></p> <ul style="list-style-type: none"> <li>The allocation of sites takes account of the evidence from the Housing and Economic Land Availability Assessment (HELAA), Sustainability Appraisal (SA)</li> </ul> <p>We note that the SA recognises the presumption against development in the countryside.</p> <p>We note that the SA is written prior to exiting the EU, and for example refers to EU Directives on building standards (Appendix 3).</p> <p>We also note that the SA recognises that current installed renewable energy capacity is about 15% of the previously designated 2016 target, and that the target has not been updated to reflect West Berkshire Council policy (2019)</p> <p>We also note that the Infrastructure Delivery Plan is part of the SA and that IDP should "deal with existing deficiencies and to cater for a growing and changing population".</p> <p>It is necessary that that the SA is brought up to date with relevant UK legislation to enable cross-referencing of appropriate legislation.</p> <p>It is essential that the SA is updated to reflect the new net-zero carbon policy (2019) of West Berkshire Council and that any new development demonstrates how it can respect net-zero carbon.</p> <p>It is essential that the IDP that has been produced is published for the consultation on the SA to be valid.</p>	
Theale Parish Council (lpr1101)	<p><b>Theale's character</b></p> <p>Theale is a historic village with its own rural identity. Its location entails strong rail and road links, making it an excellent location for businesses. However, this presents a risk to the village's character and makes it vital to</p>	<p>Comments noted.</p> <p>The spatial strategy focuses development on existing settlements, using the settlement hierarchy, to meet identified needs for housing and employment. As the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>keep the two areas separate. The allocated and proposed sites for development listed below bely this.            Allocated employment area off Hoad Way (EMP6) [<i>Detailed representation included at Policy SP 21</i>]            Proposed residential developments at Whitehart Meadow (RSA 16) and the former sewage works (RSA 17) [<i>Detailed representations included at Policy RSA 16 and RSA 17</i>]</p> <p><b>Theale's infrastructure</b>            The proposed developments present a substantial increase in Theale's population. Following the approval of the Lakeside development of over 300 houses—already a large increase—the village needs an adjustment period to recognise deficiencies in the existing infrastructure. The following facilities would need addressing urgently:</p> <ul style="list-style-type: none"> <li>• the medical centre would need to expand</li> <li>• sewage and drainage would need upgrading</li> <li>• the new primary school was built to accommodate the existing number of pupils attending—this would need to expand and</li> <li>• there would need to be a community hub or leisure centre—something which is currently lacking.</li> </ul> <p><b>Conclusion</b>            Taken in their totality, the additional sites for development identified in the draft Local Plan represent an unacceptable increase to the size of Theale. The parish council strongly encourages a period of adjustment following the already approved large-scale developments, otherwise it is concerned how the existing infrastructure will be able to cope.            The parish council strongly encourages a period of adjustment following the already approved large-scale developments, otherwise it is concerned how the existing infrastructure will be able to cope.</p>	<p>Parish Council point out, Theale is a very sustainable location, with excellent transport links and local facilities.</p> <p>Responses to comments on the sites proposed in Theale are included in the responses on SP21, RSA16 and RSA17. The representations and any further work on site assessment will be considered in decisions on taking forward the proposed sites in the next version of the LPR.</p> <p>Key infrastructure schemes will be set out in the Infrastructure Delivery Plan and the Council will work with infrastructure providers and stakeholders to identify requirements and co-ordinate delivery.</p>
Tilehurst Parish Council (lpr1980)	<p>The Tilehurst NDP will not be allocating sites (SP1, SP3). It will instead focus on defining policies to ensure that wherever development happens in the Parish it meets the needs and wishes of the local community, takes due consideration of environmental and ecological impacts and protects green spaces. It will also define infrastructure projects to mitigate the impact and enhance the quality of life for residents.            Section 4.12 should include Tilehurst Station.</p>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
Reading Borough Council (lpr1486)	We support WBDC's continued focus on development within existing settlements and strong protection for the North Wessex Downs AONB. We would welcome further dialogue as detailed below to ensure proper provision of infrastructure, particularly regarding growth at the edge of Reading's boundary within the Eastern Area.	Support for the policy noted.
Vale of White Horse & South Oxfordshire District Councils (lpr1775)  South Oxfordshire District Council (lpr1780)	<p>Vale of White Horse District Council and South Oxfordshire District Council support the logical approach that the draft Plan takes to meeting future growth needs across West Berkshire and we support the underlying principles behind the proposed spatial distribution of development, particularly in the context of the physical constraints to development, with 74% of West Berkshire lying within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).</p> <p>We note that Policy SP1 (Spatial Strategy) proposes '<i>appropriate and sustainable growth</i>' in the AONB that conserves and enhances its special landscape qualities, as set out in Policy SP2. We also note that Policy SP15 (Sites Allocated for Residential Development in the North Wessex Downs AONB) identifies six large housing sites (total of 350 dwellings) and five small/medium sites (total of 50 dwellings), with sites to accommodate a further 20, 55 and 25 dwellings identified within the respective Neighbourhood Plans for Hermitage, Hungerford and Lambourn. We see that there are existing allocations in the AONB at the rural service centres and service villages that are still to be delivered and which will largely meet housing need in this rural area. Overall, the level of growth appears commensurate with the environmental constraints and the need for a higher level of landscape protection and enhancement within the AONB and its setting.</p> <p>At Vale of White Horse District Council, we are committed to working collaboratively with our neighbouring authorities. Thank you again for the opportunity to review your consultation document and we hope that a positive working relationship between the two councils continues as you progress with your Local Plan Review to 2037.</p>	Comments noted. No changes to the policy are required in light of this representation. Support for the policy noted.
Wokingham Borough Council (1467)	The Plan takes a place based approach to future growth, by identifying 3 distinct spatial areas: Newbury and Thatcham; North Wessex Downs AONB; and Eastern Area. Development sites and decisions within each spatial area	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>should therefore reflect the different characteristics of the district. Within each of the areas, settlements are defined and placed within the settlement hierarchy based on their function and sustainability.</p> <p>The Newbury and Thatcham urban area continues to be the focus of new housing and employment development. An urban extension south of Newbury is proposed to accommodate 1,500 dwellings (carried forward from the existing development plan and expected to deliver 1,000 dwellings within the plan period) as well as regeneration and intensification within the existing centre for a further 250 dwellings. The expansion of Thatcham to the north east is also proposed, comprising 2,500 dwellings, of which a minimum 1,250 are expected within the plan period.</p> <p>The Eastern area partly adjoins WBC. Here the strategy proposes to maintain the individual identities of the separate settlements and to conserve the high quality landscape and environmental assets. New non-strategic development allocations are proposed at Theale, Woolhampton and Tilehurst in addition to existing commitments at Theale, Calcot and Burghfield Common. AWE Burghfield and AWE Aldermaston are significant constraints, which act to restrict development opportunities.</p> <p>The largest area, the North Wessex Downs Area of Outstanding Natural Beauty (AONB), will accommodate appropriate and sustainable growth that conserves and enhances its special landscape qualities. Only modest (between 15 – 55 dwellings) new development allocation sites are proposed.</p> <p>The spatial strategy proposes to direct development to areas of lower environmental value, optimising the use of previously developed land (PDL), and optimising development densities. Higher development densities (at least 70 dwellings per hectare (dph)) are expected in town centres as part of flatted development, and a district wide minimum of 30 dph applies unless this would harm prevailing character. It is recommended that WBC support WBDC's intention to promote higher density housing at more sustainable settlements.</p> <p>Overall, the spatial strategy approach does not seek to allocate significant levels of development in proximity to WBC, with growth focussed on Newbury and Thatcham as the largest and most sustainable settlements.</p> <p><u>Grazeley Garden Town</u></p> <p>Over a number of years, WBC has worked jointly with WBDC and RBC to</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>investigate the potential for a garden town in the area around Grazeley. This work, which was undertaken with the support of Homes England and the Ministry of Housing, Communities and Local Government considered the potential to deliver 10,000 dwellings within WBC and 5,000 dwellings in WBDC over an extended period. The three local authorities prepared a joint bid to the government's Housing Infrastructure Fund (HIF) for £252m in order to achieve the upfront delivery of key infrastructure. This bid was ultimately unsuccessful.</p> <p>The Plan acknowledges that whilst Grazeley has been identified as a possible location for a new garden settlement, there are uncertainties regarding the proximity to AWE Burghfield, funding for infrastructure and delivery timescales. As a result, the Plan does not identify Grazeley as a development allocation.</p>	
<b>General consultation bodies</b>		
Defence Infrastructure Organisation (lpr2071)	<p>In line with the need to ensure matters of National Security are considered and National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. As such operational development on MOD establishments should be supported. In turn, due to the need to maintain operational capabilities, development in proximity of MOD Establishments should be required to demonstrate that they align with the 'agent of change' principle found in paragraph 182 of the NPPFii. As such their development won't lead to the need for mitigation from MOD activities. It is therefore suggested that emerging development plans include a specific policy to address those needs. Such a policy also needs to recognise the brownfield nature of MOD sites and the MOD's commitments to bring forward proposals to reduce its built estate, as part of those proposals sites could be declared as surplus Such policies have been adopted in development plans across the UK.</p> <p>For MOD operational developments the associated community facilities needed are identified through nationally set guidance known as Joint Service Publications (JSPs). In summary, these seek to identify that the daily needs of service personnel are met within MOD establishments. It would not therefore be appropriate for CIL / Developer contributions policies not to take</p>	<p>Comments noted.</p> <p>The Council does not consider that there is a need for an additional policy for MOD establishments. Both facilities are in the AONB and if the site or part of the site is surplus to requirements it may be more appropriate to prepare an SPD.</p> <p>With regard to the protection of the area around the existing facilities, the NPPF already provides a policy, which together with the AONB designation should provide ample protection.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>account of that level of existing provision and “double count” contributions needed. There are specific elements also related to service accommodation as outlined below.</p> <p>Suggested policy on MOD Establishments:  POLICY Military Establishments: New development at military establishments that helps enhance or sustain their operational capability will be supported.</p> <p>Redevelopment, conversion of change of use of redundant MOD sites and buildings at Welford and Hermitage will be supported.</p> <p>Non-military or non-defence related development within or in the areas around a MOD site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.</p>	
Defence Infrastructure Organisation (lpr2074)	<p>Neighbourhood Plans:  The case of Daws Hill v Wycombe (C1/2013/0861) established that land should not be included in neighbourhood plans where it would lead to ‘false expectations’ (para 22). Neighbourhood plans should therefore be realistic about what they can control. It should be noted that separate legislation applies to the Crown estate and the operational military nature of MOD sites means that engagement and enacting of Neighbourhood plans to cover the area would not be appropriate. It is therefore suggested that designated Neighbourhood Plan areas should exclude MOD establishments.</p>	<p>Comments noted.</p> <p>The Council does not consider that there is a need to exclude MOD land from Neighbourhood Plan areas.</p>
Heritage Forum (lpr68)	<p>Support for policy.  SP1 “Thatcham will be a focus for regeneration...” Thatcham’s historic identity, as possibly one of the oldest towns in England, has suffered through the loss of much of historic significance in the Broadway area owing to poor development choices in the past. A specific reference should be made to respecting and conserving what remains in future.</p>	<p>Support for the policy noted.</p> <p>The development plan should be read as a whole and other policies cover issues of conservation and the historic environment.</p>
Avison Young for National Grid plc (lpr357)	<p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.  Details of the sites affecting National Grid assets are provided below.  <b>Electricity Transmission -</b></p>	<p>Comments noted.</p> <p>Details of National Grid assets will be taken into account in any site assessment.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>YG route TWR (040-110): 400Kv Overhead Transmission Line route: Bramley to Didcot 1            400Kv Underground Cable route: Bramley to Didcot 1            400Kv Underground Cable route: Bramley to Didcot 2</p> <p><b>Gas Transmission -</b>            Gas Transmission Pipeline, route: CHALGROVE TO BARTON STACEY            A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see information outlining further guidance on development close to National Grid assets.</p> <p>Guidance on development near National Grid assets            National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.</p> <p><u>Electricity assets</u>            Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p> <p>National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <a href="https://www.nationalgridet.com/document/130626/download">https://www.nationalgridet.com/document/130626/download</a></p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.</p> <p>National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: <a href="http://www.nationalgridet.com/network-and-assets/working-near-our-assets">www.nationalgridet.com/network-and-assets/working-near-our-assets</a></p> <p><u>Gas assets</u></p> <p>High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.</p> <p>National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement. National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded.</p>	
West Berkshire Green Party (lpr1824)	Spatial strategy. We believe the plans for Sandford and North-East Thatcham run counter to many of the objectives and the vision outlined in the plan.	Comments noted. The strategy includes making available housing of different types, tenures and affordability. The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries.
<b>Other stakeholders</b>		
David Bridle(lpr19)	<p>The A4 corridor nodes (on the Northern flank) has capacity to reduce the concentration/density of the housing allocation earmarked for Thatcham NE. These smaller centres along the A4 all have good connectivity inc rail connections and more housing sites would enhance the viability of their respective local businesses, services and schools.</p> <p>Reduce the density of housing planned for sites such as Thatcham NE by utilising smaller sites along the A4 corridor and A34 corridor.</p>	Comments noted. Sites promoted for development have been assessed within the HELAA. The HELAA is a technical document that makes a preliminary assessment of the suitability and potential of sites. Sites that were not ruled out in the HELAA were then subject to further site selection work. An

Respondent (with lpr ref)	Response	Council Response
	Assess the viability of existing and planned office sites for housing considering the change in demand for offices as a result of the likely permanent shift to home working.	<p>update to the HELAA and the site selection background paper which will be published alongside the Regulation 19 consultation.</p> <p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p>
James Benford (lpr46)	<p>I feel further development in Theale will expand an already growing Village. We moved here because of the village feel, peaceful location, access to good schools and local services. Due to expansion up to this point these existing services are significantly stretched. The primary school is full and I cannot get a doctor's appointment for 2 weeks (this was before COVID arrived!)</p> <p>The roads are getting busier and the pressure to build additional houses is reducing the space for my family to enjoy which impacts on our quality of life.</p> <p>Changes sought: There must be other spaces near Newbury that can accommodate the additional need for housing which I do understand.</p>	<p>Comments noted.</p> <p>The spatial strategy focuses development on existing settlements, using the settlement hierarchy, to meet identified needs for housing and employment. Theale is a very sustainable location, with excellent transport links and local facilities. Key infrastructure schemes will be set out in the Infrastructure Delivery Plan and the Council will work with infrastructure providers and stakeholders to identify requirements and co-ordinate delivery.</p>
David Copas (lpr1431)	<p>The spatial strategy SP1 and SP2 and supporting text are important. SP1 states: 'Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements'.</p> <p>However the red-lined envelope depicted in the Thatcham growth study fails to address the necessary separation and is in direct contradiction to this strategy. The separation of Newbury and 'surrounding rural settlements' from places identified in the development strategy (e.g. Thatcham</p>	<p>Comments noted.</p> <p>The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>regeneration) needs to be strengthened in every aspect of Council thinking and policy.</p> <p>Recommendation 2– The LPR must step up and improve its policy, internal and external guidance on separation. The requirement for a strategic gap, to include buffer zones, with recognition of village visions prepared by Parish Councils is essential. It must ensure that sufficient budget is allocated to meaningful strategic separation by developers in their appraisals. Pre-commencement conditions must be set to enforce this.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the strategic site at North East Thatcham be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
Tim Hall (lpr638)	<p>Disagree with Sandford and Thatcham NE proposals</p> <p>Reconsider both Thatcham and Newbury town centres and avoid in every possible way the extension of both towns into greenfield land which would be profligate, contrary to all good sense and impossible to do sustainably or in line with the demands of the Climate Emergency.</p>	<p>Comments noted.</p> <p>The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes</p>
Ian Halliday (lpr600) Jane Halliday (lpr601)	<p>The plans for Sandford and NE Thatcham run counter to many of the objectives and the vision outlined in the plan.</p> <p>Changes sought:</p> <ul style="list-style-type: none"> <li>• Identifying more brownfield sites within existing settlements and using the JV with Sovereign Housing and/or the proposed WBC Housing Company to develop these sites with a focus on social housing.</li> <li>• Scaling back the office space development envisaged in the plan as demand is unlikely to grow as envisaged in the plan, as businesses adapt post-Covid.</li> <li>• Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This district would benefit from</li> </ul>	<p>Comments noted.</p> <p>The spatial strategy complies with the NPPF and seeks to focus development within the settlement boundaries of those settlements within the settlement hierarchy, on previously developed land.</p> <p>Policy SP19 sets out the Council's approach to delivering affordable housing. Policies DM15 and DM16 set out the Council's approach to delivering affordable housing in rural areas via exception sites.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</p> <ul style="list-style-type: none"> <li>• There is a need for more rural homes, particularly affordable and social housing that would enable younger families to live and work there. This would enable villages to thrive and not just become nice places for commuters to spend their evenings and weekends.</li> <li>• It seems that the draft plan concentrates on building as many homes as possible in just two areas rather than take a more imaginative, balanced, and district-wide approach.</li> </ul>	<p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p>
David Hill (lpr695)	<p>Whilst the focus for development centres around more urban areas, the infrastructure in these areas is becoming increasingly over-burdened. Traffic congestion for example in and around Newbury and Thatcham is a major barrier to desire of businesses to be based within these towns. Schools and Doctors surgeries are stretched beyond capacity.</p> <p>Meanwhile, in the smaller villages, isolation issues are becoming more prevalent, community infrastructure such as pubs, surgeries and libraries are closing owing to lack of use. The age and social profile of residents is disproportionately old and wealthy. Social cleansing of villages is a severe detriment to the communities within them. Exacerbated by increasing house prices and a shortage of affordable (lower case "a") housing.</p> <p>The Spatial strategy should seek to provide for the displaced local citizens who struggle to work or afford to live in these rural areas. Forced to move into two due to rising house prices and closure of facilities owing to lack of use.</p> <p>Provision of family homes to rent, offered by responsible rural landlords should be encouraged. Particularly where they can be provided at affordable levels by prior arrangement.</p> <p>The centralisation of development leads only to a growing divide in social structure and proportionate development in rural villages should be encouraged.</p>	<p>Comments noted.</p> <p>The spatial strategy complies with the NPPF and seeks to focus development within those settlements within the settlement hierarchy. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>Key infrastructure schemes will be set out in the Infrastructure Delivery Plan and the Council will work with infrastructure providers and stakeholders to identify requirements and co-ordinate delivery.</p> <p>Policy SP19 sets out the Council's approach delivering affordable housing. Policies DM15 and DM16 set out the Council's approach to delivering affordable housing in rural areas via exception sites.</p>
Susan Millington (lpr460)	<p>I believe the plans for Sandleford and NE Thatcham run counter to many of the objectives and the vision outlined in the plan.</p>	<p>Comments noted.</p>

Respondent (with lpr ref)	Response	Council Response
Heather Kearns (lpr514)	<p>The area of Theale is and will be swamped with new developments within the near future especially if planning permission is granted to the proposed Pincents Hill development. Consequently the A.4, M.4 and Theale by-pass will become extremely busy with all types of vehicles. The Local Plan Review, in my opinion, does not ensure that the right development happens in the right place at the right time and will not benefit communities and the economy. The amount of housing proposed and office buildings will have a detrimental effect on Theale and its surroundings. There is already a Business Park off the A.4 roundabout approaching the by-pass so it seems ludicrous to think of putting another one on the opposite side creating more traffic approaching and leaving Theale.</p> <p>Therefore I object very strongly to the idea of totally swamping Theale and its surroundings.</p> <p>Changes sought: To leave the area of Theale alone with no further housing or commercial development.</p>	<p>Comments noted.</p> <p>The spatial strategy complies with the NPPF and seeks to focus development within those settlements within the settlement hierarchy. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>Key infrastructure schemes will be set out in the Infrastructure Delivery Plan and the Council will work with infrastructure providers and stakeholders to identify requirements and co-ordinate delivery.</p> <p>Transport modelling will form an important part of the evidence base and applications will need to mitigate any impact on local transport networks and the strategic road network, as outlined in policy SP22.</p> <p>Responses to comments on the sites proposed in Theale are included in the responses on SP21, RSA16 and RSA17. The representations and any further work on site assessment will be considered in decisions on taking forward the proposed sites in the next version of the LPR.</p>
Debby Reynolds (lpr1309 and 2460)	<p><b>Chapter 4 Development strategy – our place based approach</b></p> <p>The spatial strategy SP1 and SP2 and supporting text are important. SP1 states: 'Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements'.</p> <p>However the red-lined envelope depicted in the Thatcham growth study fails to address the necessary separation and is in direct contradiction to this strategy. The separation of Newbury and 'surrounding rural settlements'</p>	<p>Comments noted.</p> <p>The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>from places identified in the development strategy (e.g. Thatcham regeneration) needs to be strengthened in every aspect of Council thinking and policy.</p> <p><b>Recommendation 2– The LPR must step up and improve its policy, internal and external guidance on separation.</b> The requirement for a strategic gap, to include buffer zones, with recognition of village visions prepared by Parish Councils is essential. It must ensure that sufficient budget is allocated to meaningful strategic separation by developers in their appraisals. Pre-commencement conditions must be set to enforce this.</p> <p><b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the strategic site at North East Thatcham be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The Local Plan Review will be subject to further consultation and public examination, as required by legislation.</p>
Ivor McArdle (lpr544)	<p>The West Berkshire District Council Local Plan clearly represents a significant amount of work and provides a comprehensive response to the key issues of the day, both national/international and local. Few could be in disagreement with its aims however the challenge faced is how to achieve them in a balanced way.</p> <p>The recognition of the value of protecting and enhancing the character of the varying landscapes across the district, and recognising and maintaining the distinctness of individual areas, is extremely positive. Much of West Berkshire is made up of towns, villages and local areas, whose distinctiveness and local character are very important.</p> <p>The main concern around the plan is that the aims have not been met for significant areas of the district, due to a number of constraints; both those placed on West Berkshire District Council and those it has chosen to adopt. This response covers three areas:</p> <ol style="list-style-type: none"> <li>1. The treatment of the North Wessex Downs AONB</li> <li>2. The proposal for c2,500 new dwellings in the north east of Thatcham (THA20) (see lpr546)</li> <li>3. The particular treatment of Cold Ash parish</li> </ol> <p><b>North Wessex Downs AONB</b></p>	<p>Comments noted.</p> <p>The spatial strategy focuses development on existing settlements, using the settlement hierarchy, to meet identified needs for housing and employment. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>The comments regarding the AONB and treatment of Cold Ash parish are noted. The AONB designation applies to an area which constitutes different settlements with different characteristics. However, the AONB designation is the unifying factor and within the whole of the AONB, conservation and enhancement of the natural beauty of the landscape in the AONB is the primary consideration in the assessment of all development proposals.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The rules and regulations around development of an AONB are to be applauded and West Berkshire District Council's embracing of them is important. However, such high values need to be put in context of the overall picture of West Berkshire. As highlighted in the report, 74% of West Berkshire is covered by the North Wessex Downs AONB. Embracing AONB regulations to their fullest means West Berkshire District Council is accepting of the increased impact of development in the non-AONB areas of the district, which is further exacerbated when taking into account the wider restrictions relating to AWE and flood zones.</p> <p>So, rigorous application of AONB rules is only feasible if it is balanced with allowance in the housing targets set by central government. In the situation where this isn't the case, it places an undue burden on the non-AONB areas, in terms of the amount of development they are expected to absorb. This in turn would result in a polarisation of the district into heavily urbanised areas, with little green space, and significant swathes of rural land, with little development. This polarisation cannot be good for the district, as it is likely to result in a higher incidence of mental health issues among the population that is forced into living in very urbanised areas, which will be at odds with those who are fortunate enough to live in the rural areas. Indeed, the proposals defend the aims in relation to Landscape Character and Distinctiveness of locations in relations to AONB, but at the expense of all of the other areas within the district.</p> <p>What the district needs is a more balanced approach to development, with more green space retained in urban areas, more sensitive and landscape appropriate development in the rural areas and a gentle flow from urban to rural environments, thus providing a natural continuum.</p> <p>The stark difference proposed, between the treatment of AONB and urban areas, is likely to lead to an us and them mentality, which cannot be helpful for the district as a whole.</p> <p><b>The treatment of Cold Ash Parish</b></p> <p>It has been accepted by West Berkshire District Council that Cold Ash Parish is in a quite unique position. This can be explained by the fact that it has been placed within the same spatial area as Thatcham and Newbury and has also been recognised as a service village. This leaves it in a confusing position, as the development expectations of each are quite</p>	<p>The policies of the Local Plan need to be read together in the consideration of any development proposal. Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of policy SP7 and applies across the whole of the district. The supporting text notes that <i>'New development should begin with an understanding of an area's existing character and context and its design should evolve from West Berkshire's high quality and diverse landscape character and rich built and cultural heritage. Development should complement and enhance existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed.'</i></p>

Respondent (with lpr ref)	Response	Council Response
	<p>different; the Thatcham and Newbury spatial area has higher development density expectations, whilst service villages are "smaller rural settlements" that "may offer some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs". Also, part of the parish in in the North Wessex Downs AONB. The plan doesn't balance this dichotomy, as the allocated number of houses is significantly higher than similar service villages, even though there are already c100 dwellings due to be built in response to the DPD.</p> <p>Also, Cold Ash village is strategically placed between Thatcham and the strategic road network of the M4 and A34. This results in a high volume of transit traffic through the parish, which would be greatly exacerbated by the building of c2,500 houses to the south east of the parish. It needs to be borne in mind that the parishes road network is predominantly made up of adopted tracks, many without pedestrian paths.</p> <p>It's clear that the landscape, character and distinctiveness of Cold Ash is very important to its parishioners. It also provides a valuable flow between the urban areas of Thatcham and Newbury, to the south, and the rural landscape and AONB, to the north, due to its balanced blend of sensitive housing and semi-rural road network, and an appropriate amount of green space. As such, any overdevelopment or urbanisation, with excessive housing and an upgraded road network, is likely to destroy the nature, character and distinctiveness of the area, which will be a loss not only for the parishioners of Cold Ash, but also to those of the surrounding areas, both urban and rural.</p> <p><b>Summary</b></p> <p>So, in summary, whilst the aims of protecting the AONB are laudable, the price the district would need to pay to achieve them are too great. Central government has indicated that it's attitudes towards AONB and the way land is used is changing. One such proposed change, to the way grants are allocated to landowners, shows the desire to provide greater access to the countryside for the general population. Surely this can be best provided for if urban and rural areas co-reside rather than being in discrete areas. It is fully accepted that this would need to be landscape led and protect the character and identities of the various areas, but surely this is achievable with the right focus and approach.</p>	



Respondent (with lpr ref)	Response	Council Response
	A review of the approach to AONB would enable a more pragmatic and sustainable solution to be found, enabling appropriate development in the AONB whilst avoiding the ghettoization of our urban areas and protecting the natural buffers and flow between the two.	
Sarah Mulvany (lpr736)	Over the past 12 years we have seen so many properties being built which has already seriously increased the size of the village. The queues of traffic on the A4 are bad enough during rush hour.	Comments noted.  Transport modelling will form an important part of the evidence base and applications will need to mitigate any impact on local transport networks and the strategic road network, as outlined in policy SP22.
Peter Norman (lpr997)	<p>SP1 The plan carries over from the Core Strategy 2006 to 2026 the strategic site allocation of Sandford in spite of the site having not delivered 1 of the 1,000 homes that were supposed to be delivered up to 2026. It is now highly unlikely that it will deliver any of the housing promised in that time period and it now is planned to deliver only 1,350 homes on the footprint agreed in CS3 for 2,000 homes.</p> <p>It is inconceivable that as we now enter a new period that that decision to allocate Sandford as a strategic site is not reviewed against other sites that have now come forward. Much of the development of Sandford would be in direct breach of the objectives laid out in this document, and if proper protection of protected habitats are taken into account it will not be able to deliver anything like the 1,500 homes, even with the expanded footprint now being proposed in this document. Failure to achieve this target would undermine the fabric of the whole plan and will lead to unwanted developments that Sandford was supposed to avoid but failed as we saw with North Newbury.</p> <p>Why is the Council opening itself up to making the same mistake all over again rather than conducting an independent review from the extensive knowledge that it now has of the site, to see if the housing allocation for Sandford is realistic and how it now compares with other sites that could come forward? As such SP16 should be reviewed in light of current strategic objectives as opposed to relying on a study that is now 11 years out of date.</p>	<p>Comments noted.</p> <p>The spatial strategy complies with the NPPF and seeks to focus development within those settlements within the settlement hierarchy. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>SP17 with 2,500 homes for Thatcham is curious. In the review of strategic sites conducted in 2010 where Sandleford was selected over North Newbury and Thatcham (Siege Cross) the latter was dismissed as it was believed that Thatcham was over developed and needed time for the infrastructure to catch up. Clearly nothing has been done to improve Thatcham's infrastructure in the intervening period so what's changed that makes developing 2,500 homes in Thatcham a sensible option? The whole housing allocation across the district needs to be reviewed especially in the light of Covid-19 which has changed peoples work patterns and requirements. The whole of SP1 needs to be reviewed in light of changes to work patterns wrought by Covid19 to see whether spatial patterns and mix for offices and retail are still relevant. Also with the development of LRIE what land is the Council allocating for non-office based work and employment (such as engineering firms) that provide vital work opportunities for apprentices and non-academic students and where in the LPR is there recognition of the current under-provision of community sports sites?</p> <p>Given the change in work patterns and a greater emphasis of people working from home the whole strategy of meeting the area's housing needs through large urban extensions should be reviewed as more people could be looking to rural living with community hubs and workspaces bringing renewed life to villages and the opportunities to open facilities that have been closed due the migration to urban centres (eg pubs and shops).</p> <p>Changes sought:  SP16 should be subject to an independent assessment as to how many houses Sandleford could deliver while keeping to the LPR other objectives of sustainable development under 3.3 in particular protecting and enhancing biodiversity of its ancient woodlands and other protected habitats as well as minimising waste and pollution to our air and water its rivers and aquifers and to reduce the district's carbon footprint. This then needs to be compared to other potential sites in the district to review where best to allocate a strategic site for housing (if at all). This would also apply to SP17 as otherwise the Council will be repeating the mistakes of having all its houses</p>	

Respondent (with lpr ref)	Response	Council Response
	in one or two baskets delays to which will lead to unplanned and unwanted development without the requisite infrastructure.	
Ian Parsons (lpr826)	<p>Support policy.</p> <p>The priority given to brownfield sites is to be welcomed, and fully supported. Also, the increase in home working, with the consequent reduction in the need for office space, means that office and retail space in Newbury, Thatcham and elsewhere has become available for housing. If the council can utilise this opportunity the revitalisation of the high street may become a realistic probability.</p>	<p>Support for the policy noted.</p> <p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain's exit from the European Union and the Covid-19 pandemic. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p>
Paula Saunderson (lpr952)	Object to policy	Comment noted.
Graham Storey (lpr564)	<p>Object to policy.</p> <p>Housing delivery in the current draft plan is too reliant on large edge-of-town developments, namely Sandleford and NE Thatcham. I believe these are not sustainable developments in any meaningful sense of the word, and are incompatible with the council's environment strategy and climate change targets.</p> <p>As estates that would be dominated by car use, they contravene the council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in the Vision section I believe the plans for Sandleford and NE Thatcham run counter to many of the objectives and the vision outlined in the plan.</p> <p>Changes sought:</p> <p>Scale back these development in favour of more small scale developments, brownfield sites and the redevelopment of the Colthrop estate into a mixed housing and employment area. Create a new employment zone around J13 of the M4 and support the relocation of the Thatcham distribution centres to this location</p>	<p>Comments noted.</p> <p>The spatial strategy complies with the NPPF and seeks to focus development within those settlements within the settlement hierarchy. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The need for these two new estates could be mitigated or eliminated by:</p> <ol style="list-style-type: none"> <li>1) Identifying more brownfield sites within existing settlements and using the JV with Sovereign Housing and/or the proposed WBC Housing Company to develop these sites with a focus on social housing.</li> <li>2) Scaling back the office space development envisaged in the plan as demand is unlikely to grow as envisaged in the plan, as businesses adapt post-Covid.</li> <li>3) Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This would involve relocating the existing distribution centres to a more appropriate location closer to the motorway junctions. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</li> <li>4) There is a need for more rural homes, particularly affordable and social housing (rather than “executive homes”) that would enable younger families to live and work there. This would enable villages to thrive and not just become nice places for commuters to spend their evenings and weekends. In addition the windfall allowance of 140 dwellings a year in the plan is less than the historical volume. Making assumptions in line with recent years would further reduce the need for new edge-of-town development.</li> </ol> <p>Overall, there is a perception that the draft plan concentrates on building as many homes as possible in just two areas rather than take a more imaginative, balanced and district-wide approach. The plan also has an unconvincing approach to affordable housing (see comments against SP19 below).</p>	<p>planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p>
Nataliya Topliss (lpr793)	<p>West Berkshire council stated in their previous Plans that Thatcham will be a focus for regeneration. This is never true. Thatcham has not had any regeneration for the last 20 years. The only thing Thatcham has had is numerous developments of the residential housing. Thatcham got thousands of new homes and zero regeneration and no infrastructure investments. Changes sought: West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then,</p>	<p>Comments noted.</p> <p>The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p>

Respondent (with lpr ref)	Response	Council Response
	there has been no such regeneration so the Council's conclusions of 2012 must still stand.	
Councillor Tony Vickers (lpr526)	<p>Support policy. We support the overall Spatial Strategy apart from having two caveats.</p> <p>1. If Grazeley proves to not be ruled out, it would be preferred to NE Thatcham and would be a departure from the strategy that puts most new housing in the Newbury &amp; Thatcham area. It would also sit outside the settlement hierarchy policy as an entirely new settlement - eventually on a level with Thatcham.</p> <p>2. The Strategy does not recognise that it may be necessary to allow some high density housing within Designated Employment Areas that need modernisation and redevelopment, in order to make such redevelopment economically viable. This is already universally known in the case of LRIE, so why is it not stated in the Plan? Taking NPPF paragraphs 120 &amp; 121 together, we believe that in order for some older DEAs to achieve the necessary redevelopment for anticipated appropriate future employment uses, a significant amount of housing – including market housing – will need to be included. The contribution of this housing to the total requirement for the District should be explicitly recognised in the spatial strategy and not left as ‘windfall’. There is otherwise “no reasonable prospect of an application coming forward for the use allocated in the plan” (para 120), so we should “support proposals to use employment land for homes in areas of high housing demand” like Newbury (para 121a) where it will also enable increased employment on such sites. Changes sought: Further to the point made in Section 2 about Thatcham’s poor road links: In 4.9, add to end of first sentence: “... apart from lacking a route linking the commercial area east of Thatcham at Colthrop across the main railway to the A339 and A34/M4/M3 avoiding the A4 and A339 through Newbury. This issue needs addressing as part of any new strategic developments in the area (SP16 &amp; SP17).” In the penultimate paragraph of “Newbury and Thatcham” in SP 1 the second sentence should be amended thus: “Designated Employment Areas will play a vital role in meeting the existing and future economic needs of the District <b>but it may be necessary to allow</b></p>	<p>Support for the policy noted.</p> <p>The spatial strategy complies with the NPPF and seeks to focus development within those settlements within the settlement hierarchy. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>Robust up-to-date evidence sets out the continuing need for housing and economic (employment land) development, including following Britain’s exit from the European Union and the Covid-19 pandemic. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p> <p>However, need and demand for employment land in West Berkshire remains strong. Designated Employment Areas (DEAs) are considered to represent coherent areas of employment land containing established concentrations of office, industrial and warehousing development. These areas allow business uses to locate together, complement and support one another, with relatively little disturbance to surrounding residential areas. It is therefore important to ensure the role and function of each DEA is maintained and strengthened to enhance economic growth so as to prevent their economic function being diluted and potentially compromised through amenity concerns or a lack of competitiveness.</p>

Respondent (with lpr ref)	Response	Council Response
	<b>some high density housing within them in order to facilitate their renewal, for economic viability reasons.”</b>	The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review and some of the issues raised are more appropriately considered as part of that process. Other detailed comments will be dealt with as part of the Council’s response to comments made under policy SP17.
Toby and Gail Woodhouse (lpr2019)	Object to policy.  ( <i>Extracted from whole rep to SP17 Thatcham</i> ) The proposed development abuts Bucklebury Common and the North Wessex Downs AONB. Residents of the proposed new developments will be drawn to the Common and will significantly increase the pressures already evident on the delicate eco systems and existing wildlife. Parking on and around the Common is already exceeding capacity, with verges being used during peak periods. Whilst the development is relatively close, not all residents will walk/cycle to the Common they are more likely to drive. The open spaces on the proposed developments will not be big enough or as appealing as the Common land within the AONB.	Comments noted.  Specific comments in relation to North East Thatcham are dealt with as part of the Council’s response to that policy.
<b>Landowners, site promoters and developers</b>		
Armstrong Rigg Planning for Manor Oak Homes Ltd. (lpr2418)	Object to policy. <i>Part of full representation promoting development of Land at Fairview, Greenways, Lambourn.</i> The Spatial Strategy proposed by Policy SP 1 continues the approach of the Core Strategy in defining three spatial areas: Newbury and Thatcham; Eastern Area; and North Wessex Downs AONB. Within this Spatial Strategy, Lambourn is within the AONB which covers 74% of the District’s area. Manor Oak Homes do not object in principle to dividing the District into specific spatial areas, but to be effective in meeting the District’s needs, these areas must be based on a thorough assessment of social, environmental and economic factors and also recognise key differences within the spatial areas. Our client therefore objects to the current categorisation of the North Wessex Downs AONB on the grounds that it fails to consider important spatial differences within this spatial area.	Comments noted.  The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.  The comments regarding the North Wessex Downs AONB and Lambourn are noted. The AONB designation applies to an area which constitutes different settlements with different characteristics However, the AONB designation is

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	<p>The North Wessex Downs AONB spatial area has clearly been identified on the basis of a single environmental characteristic – i.e. the AONB designation. This approach differs from that employed in the identification of the other spatial areas which are not simply characterised by the fact they are located outside of the AONB, but rather a nuanced approach is taken which recognises other spatial influences affecting Newbury and Thatcham and the Eastern Area (e.g. the functional connectedness of Newbury and Thatcham with their rural hinterland and the proximity of Reading and the location of important AWE sites in the Eastern Area). There is a distinct failure to apply the same nuanced approach to areas within the AONB, despite clear differences within what is a vast area that makes up 74% of the District.</p> <p>To ensure that the Local Plan respects the importance of the AONB designation, while positively planning for the specific social and economic needs within this area, we consider that much more emphasis is needed on identifying the specific needs, opportunities and constraints to development in different parts of the AONB. This could either be achieved by redefining the spatial areas in a way that honestly assesses the spatial influences affecting the whole District, or more simply by conducting this exercise for specific locations within the AONB.</p> <p>For example, the spatial context of Lambourn in the west of the AONB spatial area is quite different from that of Pangbourne in the east or the large villages of Hermitage and Kintbury that are located closer to Newbury. Lambourn is c.18 km from the nearest large town (either Swindon or Newbury), it provides a key role as a service centre to its wider rural catchment and is a nationally significant centre for racehorse breeding and training. By comparison, Pangbourne is located barely 2km from the built up area of Reading and has a station on the Great Western Railway making it part of the London commuter belt, while Hermitage and Kintbury are located 6km north and 8km west of Newbury respectively and rely much more heavily on it for key services. Lambourn is also more economically independent than those parts of the AONB (including Pangbourne) that rely more heavily on larger order settlements for employment. This can be quickly demonstrated by the following table (<i>in full representation</i>) which provides census data on the proportion of people working within 5km of</p>	<p>the unifying factor and within the whole of the AONB, conservation and enhancement of the natural beauty of the landscape in the AONB is the primary consideration in the assessment of all development proposals.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>where they live for Lambourn, Pangbourne, Hermitage and Kintbury and demonstrates that a significantly higher proportion of residents in Lambourn work locally.</p> <p>The demonstrates that were it not for the AONB designation, these settlements would have little in common with each other and highlights the need to plan for the various needs within the AONB separately.</p> <p>In Lambourn the high proportion of people working locally is a direct result of the importance of the racehorse industry to the local economy and makes the village a uniquely sustainable location. As set out in further detail under our site specific reps below, the racehorse industry also creates a unique set of housing demands that it is critical the LPR accounts for.</p> <p>As set out in further detail under <b>Policy SP 15</b> below, there is also no certainty that allocations for development will be forthcoming through the Lambourn Neighbourhood Plan and it is critical that the Council clarify the intentions of Lambourn Parish Council in this regard so that suitable allocations can be made in the LPR if required.</p> <p>Changes sought:</p> <p>Amend the spatial strategy for the AONB spatial area to provide much more emphasis on identifying the specific needs, opportunities and constraints to development in different parts of the AONB and to remove reference to sites being allocated through Neighbourhood Plans as follows:</p> <p><b>North Wessex Downs AONB</b></p> <p><i>The North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth <b>that seeks to meet the unique social and economic needs of different settlements in the area while that conserv<del>ing</del>es and enhanc<del>ing</del>es its special landscape qualities as set out in policy SP2.</b></i></p> <p><b><del>Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.</del></b></p> <p>We also recommend that to support the revisions to this policy, the supporting text should be updated to set provide a summary of the key needs, opportunities and constraints to development in key areas within the AONB. We provide this context for Lambourn below (see <i>full representations</i>).</p>	



Respondent (with lpr ref)	Response	Council Response
Barton Willmore for Copas Farms (lpr196910)	<p>Support policy.</p> <p>Paragraph 68 of the NPPF, states that to promote the development of a good mix of sites local planning authorities should “<i>Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.</i>”</p> <p>Paragraph 117 of the NPPF states that “<i>Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land</i>”.</p> <p>Our client supports draft policy SP1 which identifies optimising the use of previously developed land (PDL) to assist in the delivery of the District’s spatial vision and strategic objectives. With regards to residential sites, this is supported by national policy as indicated by the reference to paragraph 117 above. However, our client is aware that meeting housing and employment needs may not always be possible within the designated settlement areas. In terms of employment, this is accepted at paragraph 84 of the NPPF, which as indicated above, recognises that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements. Therefore, PDL sites can assist in meeting needs, in particular in rural areas outside of existing settlement boundaries which in turn, can support the provision of small sites within the District, and supports the approach within the NPPF of making as much use as possible of PDL or brownfield land i.e. “a PDL/brownfield land first approach”.</p> <p>Changes sought:</p> <p>We therefore consider the following additional wording (in bold and underlined) should be included to the following paragraph of draft policy SP1:</p> <p><i>In each spatial area opportunities will be taken to make the best use of previously developed land with higher densities of development in locations such as town centres, where the extent and capacity of supporting infrastructure, services and facilities is the greatest. <u>In particular, proposals on previously developed land of less than 10 dwellings or 1,000 sqm of</u></i></p>	<p>Comments noted.</p> <p>Policy DM16 sets out the Council’s approach to delivering housing in rural areas via exception sites.</p>

Respondent (with lpr ref)	Response	Council Response
	<u>floorspace will be supported which will assist towards the overall spatial strategy for the District including the provision of small sites.</u>	
Barton Willmore for Wilson Enterprise Ltd & Hallam land Management Ltd (lpr2411)	<p><b>The Need for a Longer-term, Wider Vision</b></p> <p>Whilst the draft Local Plan is prepared for the administrative area of West Berkshire, in reality the functional economic area and housing market area of the west of Berkshire area is a very different geography (rather around functional economic areas, travel to work areas and socio-economic frameworks). The draft Local Plan must therefore reflect this. In this regard, the draft Local Plan needs to not only comprehend and plan for its own development needs, but it also needs to understand and reflect the future needs, future growth pressures and aspirations of both employment and housing needed to support the wider economic growth of the Thames Valley and that arising from London's unmet needs in a way which affects the area. Furthermore, the future impacts of Heathrow, Crossrail, and the Western Rail Link proposals within the plan period and beyond need to be properly considered and planned for. This approach would then be in line with Paragraph 11 of the NPPF which states that Local Plans should positively seek opportunities to meet the development needs of their area - as a minimum: be sufficiently flexible to adapt to rapid change and meet the needs of any that cannot be met within neighbouring areas.</p> <p>There seems to be an inconsistency between the more inward-looking approach of the draft Local Plan and the more outward-looking West of Berkshire Spatial Planning Framework, and the benefits this provides. For example:</p> <p>Paragraph 3 of the Spatial Planning Framework states, "This focused joint working enables a new way of collaborative working across administrative boundaries, sharing best practice where it has been found, in a way which may become a legacy model for civic governance, service delivery and planning and meeting the needs for community growth in the future. In particular the focus on possible development sites which span administrative boundaries is of key importance to help deliver housing which meets needs across the four authorities..."</p> <p>Paragraph 6 goes on, "The benefit of such a spatial framework is to:</p>	<p>Comments noted.</p> <p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p> <p>The Grazeley proposal would have largely met the housing needs of the wider Reading area and would have only gone a limited way towards meeting West Berkshire's housing needs. Even without the concerns due to the proximity of AWE, the lead in time for this development meant that it was not considered appropriate to include it in the housing supply for the Local Plan Review period.</p> <p>Regarding the housing needs in London, the Greater London Authority has not asked West Berkshire Council to meet any unmet needs.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Identify large scale site opportunities which span administrative boundaries and offer the opportunity to create new and sustainable locations to live and work;</li> <li>• <i>Develop a collaborative model for successful delivery of high quality, infrastructure rich new and expanded communities in the interests of residents;</i></li> <li>• <i>Demonstrate active and real collaborative behaviours with a view to establishing a culture of co-operation in Western Berkshire;</i></li> <li>• <i>Explore opportunities for establishing a collective resource or methods of working which share expertise in community engagement, the creation of new communities, design, funding/lobbying for funding, infrastructure planning and the implementation of environmental change on a large scale;</i></li> <li>• <i>Grasp opportunities for locally planned development sites of a scale which optimise delivery strategically in locations which are less disruptive to the amenities and interests of our existing residents and bring with them additional benefits in terms of substantial, highly sustainable, integrated and 'boundary-less' infrastructure;</i></li> <li>• <i>To ensure that Local Plans are aligned to bring forward suitable high quality, infrastructure rich strategic sites which may also span boundaries”.</i></li> </ul> <p>All of the above bullet points remain important to the effective and sound planning of the area. However, the last is considered to be the most pertinent to this draft Local Plan, where the Council should be planning for the Local Plan period and beyond, recognising that Grazeley Garden Town will take time to come forward. Whilst the West Berkshire landholding, if included within the new settlement, would likely to be in a later phase, such assumptions and longer-term proposals need to be planned for and evidenced now. This would be in accordance with paragraph 22 of the NPPF which states that strategic policies should look ahead to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Grazeley has the opportunity to not only provide for much needed homes in a sustainable location, but also to provide for a range of facilities and infrastructure that will create a high quality, healthy and sustainable</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>destination for homes, jobs, and the creation of a community for generations to come. We consider that the Council needs to be clearer on Grazeley. We consider there are three options:</p> <p>Option 1: West Berkshire's land is identified at Grazeley as part of new settlement, recognising that this will come in a future plan period. In that case the Council will need to assess the Broad Location for Development in the SA, TA, and other local plan evidence base.</p> <p>Option 2: Consideration being given to Option 1 but want to keep options open given the perceived uncertainty. The Council will still need to assess the Broad Location for Development in the SA, TA, and other local plan evidence base.</p> <p>Option 3: West Berkshire's land does not form part of the new settlement, but the local plan recognises the growth on its boundary and works with Wokingham Borough Council to identify cross-boundary issues and any required mitigation.</p> <p>The local plan should therefore acknowledge this proposal, and any extension within WBDC itself (even if beyond the plan period). It should be considered now as a Broad Location for Development and be taken into account when preparing the local plan evidence base (such as the Sustainability Appraisal and Transport Assessment) to anticipate and respond to long-term requirements and opportunities of the Garden Town.</p> <p><b>Economic Growth</b></p> <p>We note again that no reference has been made to the West of Berkshire Spatial Planning Framework which has shaped the planning of the wider area. In addition, no reference is made to the important work of the Local Economic Partnership (such as the Local Economic Strategy, bids for infrastructure provision, background research on economic trends and growth projections or the emerging Industrial Strategy). This work spans across a number of administrative boundaries and will have a significant bearing upon the future of the West Berkshire area. It is therefore critical that the Local Plan and work of the LEP align and support each other so as to deliver economic growth and align locations and type of housing provision to economic needs.</p> <p><b>Housing Delivery</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>In addition to preparing to fully meet its own needs, West Berkshire must also factor in unmet need from adjacent/nearby areas, including:</p> <p><u>West of Berkshire authorities:</u></p> <p>The Memorandum of Understanding (MoU) between the Berkshire Local Authorities (July 2018) includes West Berkshire within the Western Berkshire Housing Market Area along with Bracknell Forest Borough Council, Reading Borough Council and Wokingham Borough Council. Paragraph 4.2 of the MoU states that the “<i>Berkshire Authorities will use their best endeavours to ensure that the full objectively assessed need for housing...</i>” is met.</p> <p>Under the MoU, the four authorities undertook a great deal of joint work. One of the key pieces of work was the West of Berkshire Spatial Planning Framework, which identified Grazeley on the boundary of Wokingham and West Berkshire as being able to accommodate 15,000 homes, together with supporting infrastructure and facilities.</p> <p>The Reading Local Plan was adopted in November 2019. It reflected the MoU and joint work undertaken with the other Western Berkshire authorities. Paragraph 10.1.12 of the Local Plan states, “In particular, Reading Borough Council is working with its neighbours in examining how growth can take place within the Western Berkshire Housing Market Area, in particular in view of the expectation that Reading’s unmet housing need will be accommodated within the rest of the HMA. <b>The publication of the West of Berkshire Spatial Planning Framework is an important starting point and context for this plan</b>, but this joint work will continue into the future”.</p> <p>(Author’s emphasis).</p> <p>Although the Reading Local Plan sought to accommodate the vast majority of its own housing need, there was unmet need that needed to be allocated elsewhere in the HMA, and a significant requirement for family housing which cannot be provided within Reading’s boundary given its urban nature and tightly drawn boundaries. Further, the latest Government Standard Methodology, published in December 2020, shows Reading’s housing requirement increasing to 876 dwellings per annum, an increase of 35% from the adopted local plan figure. That future requirement is highly unlikely to be met in full within Reading Borough and will create an unmet need that</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>will need to be accommodated under the Duty to Cooperate or as part of future joint working by the neighbouring authorities.</p> <p>It is quite clear from the West of Berkshire Spatial Planning Framework that the study area has significant physical constraints (Green Belt, Area of Outstanding Natural Beauty, Special Areas of Conservation, Special Protection areas, flood areas) yet has very good connections with London and the surrounding area, making it a very desirable place to live, which in turn makes affordability an issue. The identification of a new settlement of Grazeley will ensure an appropriate number of new homes will be developed in the right place to serve existing and future residents.</p> <p>This draft Local Plan and its housing target, however, seem to have stepped back from the HMA work and is 'inward looking'. We suggest that greater clarity is needed to quantify the unmet needs of surrounding boroughs within the Housing Market Area (HMA) with clear direction as to how and where these unmet needs can be appropriately accommodated, because if not at Grazeley, where?</p> <p><u>London</u></p> <p>The London Plan Examination recognised the London Plan's inability to meet its own needs and highlighted its dependence on the wider region to accommodate the unmet need. Even with the latest (likely to be adopted) London Plan housing target of 52,000 dwellings per annum there will be an annual shortfall of 14,000 homes per year. However, using the Government's proposed Standard Methodology this figure could be as high as 60,000 homes per year.</p> <p>Given the importance to the protection of the Metropolitan Green Belt, the vast majority of the unmet need inevitably falls to those areas immediately beyond the Green Belt. This includes the housing market area of the West of Berkshire authorities, which in turn includes West Berkshire. The extent of this need has not been specifically quantified for this area, but that does not result in such needs disappearing. We consider that the emerging West Berkshire Local Plan should take account of any such unmet need and continue the work of the West of Berkshire Strategic Spatial Framework to accommodate a proportion of this need.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The impact of the pandemic on the London housing market should also be considered, as the significant increase in people looking for homes outside the capital will only create more pressure in West Berkshire.</p> <p><u>Heathrow</u></p> <p>Despite recent events, the planned expansion of Heathrow airport is still a long-term ambition and an essential element to the future prosperity of the UK economy. The economic impact of this proposal is well documented. Less well documented is the housing needs that will arise from the economic growth projected.</p> <p>However, despite its importance and very real impact on the wider area, including the West of Berkshire housing market areas, no reference appears to have been given to what this could mean for the emerging Local Plan. In this regard, it is worth highlighting the Interim Inspectors Findings for the Aylesbury Vale Local Plan (August 2018), where the Inspector raised particular concerns that there are many events and planning-related issues occurring outside of the Local Plan area that would have an effect on how the Local Plan area was shaped in the future. In this context, it was the relationship of the Local Plan area to the Oxford-Cambridge growth arc and the planned Heathrow expansion, wherein he stated that “Predictable events should be planned for. Both Heathrow expansion and the Oxford-Cambridge expressway are predictable, known, events. Only the route of the latter is not yet fixed. To be sound, VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale” (paragraph 7).</p> <p>In a similar manner, it is essential that the West Berkshire Local Plan takes account of predictable and known events such as the London unmet need, planned infrastructure provision (Crossrail etc) and Heathrow expansion. This is why the cross-boundary working of the LPA's in the West of Berkshire (for example to produce the West of Berkshire Spatial Planning Framework) is so important - to identify large scale opportunities meeting the identified future development needs in the area for the local plan and beyond; and plan for any cross-boundary implications. We believe that working collaboratively will help all authorities to meet their identified housing need and that of the wider area.</p> <p><b>Conclusion</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The West Berkshire Local Plan should be positively prepared and have a justified long- term strategy for the development needs of its district or the wider area, in collaboration with its neighbouring authorities.</p> <p>The Local Plan should reflect and continue the joint work undertaken over at least the last five years in the West of Berkshire Spatial Planning Framework and more recently.</p> <p>West Berkshire should be clear in the Local Plan about its approach to Grazeley, but whichever option is pursued, the Council needs to undertake the requisite evidential work to make the Local Plan sound.</p>	
Bluestone Planning for Darcliffe Homes Ltd (lpr2425)	<p>Darcliffe Homes Ltd (hereafter 'Darcliffe') support the principle stated in policy SP1 Spatial Strategy of identifying the locations as set out in the settlement hierarchy in policy SP3 where residential development may take place. This is consistent with the guidance on the general approach to the delivery of new homes, as set out in the NPPF.</p> <p>The densities as set out in the policy are generally supported, although it should also be noted that higher density may also be achievable in certain locations, particularly around the Eastern Area.</p> <p>Careful and sensitive design can deliver higher density, without leading to unacceptable intensification.</p> <p>The policy also refers to the significant commitments throughout the District and as explained below, there are concerns that these either may not come forward during the Plan period and/ or are being built out at a rate which would mean that they are not appropriate for inclusion in the Adopted Plan and therefore alternatives will have to be sought.</p> <p>Policy SP3 sets out the settlement hierarchy and identifies the urban areas which will be a prime focus for housing. It is supported that the Eastern Urban Area will be a focus, although there is a significant imbalance between the numbers allocated to Newbury and Thatcham when compared to Eastern Area, with over 4,000 homes to the former and under 1,000 homes to the latter. This is not considered appropriate given the level of services and facilities provided to the Eastern Area.</p> <p>With regard to the Eastern Area specifically, it is stated that new allocations for Tilehurst and Burghfield will be made through NDPs. This is clearly dependent on the NDP process, which is lengthy and sometimes fraught with difficulties.</p>	<p>Comments noted.</p> <p>The housing requirement figure needs to show the extent to which the identified housing need can be met over the plan period. The HELAA assesses land availability in West Berkshire and there is no evidence to show that the minimum housing need cannot be met in the district.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p> <p>The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and</p>



Respondent (with lpr ref)	Response	Council Response
	<p>At the time of writing, Tilehurst for example have not yet published their draft Neighbourhood Plan and therefore it will still be some time before this can be taken to and approved at referendum, and housing can start to be delivered in accordance with such allocations. Although Policy SP14 sets out that the Designated Neighbourhood Area should allocate 175 dwellings, there is no timeframe for when this may come forward or whether this number will be agreed.</p> <p>It should also be noted that in the HELAA the text regarding Tilehurst makes it clear that allocations will be made within the Local Plan Review where not allocated by the NDP.</p> <p><i>“Tilehurst</i>  <i>8.31. Tilehurst Parish is designated as a Neighbourhood Area, and Tilehurst Parish Council are preparing a neighbourhood plan. The Parish Council have expressed an intention to include residential allocation(s) in the neighbourhood plan. The site selection work will therefore be undertaken by the Parish Council.</i>  <i>8.32. In the event that Tilehurst Parish Council choose not to include residential site allocations in the neighbourhood plan, then West Berkshire Council will pick up the site selection work and consider allocations through the LPR.”</i></p> <p>All other locations are to be treated as open countryside (as set out in Policy SP1) and therefore no sites in these areas could be brought forward in accordance with policy. It is therefore considered that housing allocations should also be made either independently or collaboratively in the Review Local Plan or the policy should be more flexibly worded in the urban areas.</p> <p>There is a concern that policies do not go far enough in bringing forward small and medium sized sites, particularly those located on the edge of the identified urban area settlements. As stated above, if such sites are not allocated in the Local Plan Review or in particular, a NDP, because an NDP has either not been developed or has been delayed, there is no mechanism for such sites to be approved in the future. This may be an issue of great concern where some of the larger strategic sites are not deliverable within the Plan period.</p>	<p>smaller sites, including brownfield sites within settlement boundaries.</p> <p>Strategic sites in Newbury and Thatcham are expected to deliver housing in the last 10 years of the plan period and beyond while the smaller allocations and existing permissions will deliver throughout the plan period.</p> <p>A trajectory will be prepared to accompany the Reg.19 consultation and will be reviewed annually and reported in the AMR. Progress will be continually monitored and adjustments made to the trajectory.</p> <p>Newbury and Thatcham are the largest settlements in the district and it is appropriate that the focus for development should be here. The Eastern Area is very constrained, with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston. Sites promoted have been assessed through the HELAA and site selection process.</p> <p>The Tilehurst Neighbourhood Development Plan Steering Group has responded to the consultation and has stated that it does not now intend to allocate sites for development. Further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows:</p> <p>‘Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It is also unclear from the supply calculations whether or not there has been an undersupply from the Core Strategy 2012 which has been carried forward. Sandleford Park was allocated in the 2012 Core Strategy and has not yet been granted permission. Clarification is sought as to how this has been dealt with and whether further sites should be allocated in this regard.</p> <p>The table in Policy SP13 also sets out that Sandleford Park seeks to accommodate up to 1500 dwellings, whereas the text in paragraph 6.12 states that only 1,000 houses will be delivered by 2037 and the remainder in the following Plan period.</p> <p>This approach is also inconsistent with the encouragement of developers to bring forward small and medium sized sites. The HBF document (2017) 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes' notes (p.29) that:</p> <p><i>"For understandable political and financial reasons, planning authorities have increasingly sought to allocate very large strategic sites for residential development in order to satisfy its requirement to demonstrate a five-year land supply. Large sites on the edge of settlements can be less likely to spark political controversy as they are slightly removed from existing communities. For the very same reason, however, they may require substantial infrastructure and up-front financing resulting in relatively lower delivery rates in the early years of the site's existence making rapid delivery unrealistic."</i></p> <p>The latest research from Lichfields (February 2020) 'Start to Finish What factors affect the build-out rates of large-scale housing sites? Second edition' discusses the lead times on large sites and the data is not encouraging:</p> <ul style="list-style-type: none"> <li>• Schemes of 500-999 dwellings take on average approximately 5.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 1,000-1,999 dwellings take on average between 6.9 and 7.0 years from validation of the initial outline application to</li> </ul>	<p><b>Newbury and Thatcham</b> ..... <del>New allocations for housing for Cold Ash will be made through a NDP. ....</del></p> <p><b>Eastern Area</b> ..... <del>New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</del></p> <p><b>North Wessex Downs AONB</b> ..... <del>Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.'</del></p>

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	<p>delivery of the first house. These do not contribute any completions in the first five years.</p> <ul style="list-style-type: none"> <li>• Schemes of 2,000+ dwellings take on average approximately 8.4 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years. 6.1 years of this are taken up with the planning application process. (see figure 4 of the Lichfields document)</li> </ul> <p>In contrast, smaller sites between 0 and 99 dwellings typically deliver within 3.3 years of the validation of the first application. On this basis it is considered that the following should be taken into consideration:</p> <ul style="list-style-type: none"> <li>• SP16 Sandford Park is allocated for 1,000-1,500 dwellings, taking the above into account, it would take between 6.9 – 7.0 years until the first dwelling is built based on the above assumptions. It should be noted however that the site has been allocated since 2012 and although a number of applications have been submitted, there remains outstanding issues and the site still does not have permission. It is therefore considered that given the length of time taken to date, that the site is unlikely to realistically deliver the numbers proposed.</li> <li>• SP17 North East Thatcham is allocated for 2,500 dwellings, taking the above into account, it would take 8.4 years from validation until the first dwelling is built, based on the above assumptions. There has been no application to date. It is unlikely therefore that any dwelling would be built until approximately 2030 and following this, the average annual build-out rate for a scheme of 2,000+ dwellings is an average of 160 dpa (as set out in the aforementioned Lichfields report). On this basis, with the Plan period up to 2037, this would equate to 1,120 dwellings during the Plan period and not 2,500 as set out. It is unrealistic that on an allocation of this size that dwellings could be brought forward to the market at a faster rate.</li> </ul> <p>The HBF document goes on to advise that (p.29-39):  <i>“Once allocated, LPAs are systematically failing to assess on an ongoing or regular basis, the actual delivery achieved against the targets indicated in its local plan. For instance, by allocating one or several very large sites to</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>achieve a five-year supply of land, delays progressing one site through planning will have a substantial impact on the ability of the authority to adequately plan for the number of homes required.....</i></p> <p><i>..... To meet demand for housing, we need more sites of all sizes allocated. Indeed, large sites often deliver new homes at astounding rates, particularly in areas where the market is strong, but small sites are consistently efficient in their delivery. For this reason, the allocation of a wider range of sites within local plan allocations would not only help increase plurality in the housebuilding sector, it would also improve the chances of local authorities' meeting ambitious supply trajectory plans.</i></p> <p><i>Achieving this all-round positive outcome need not involve overly prescriptive diktats. A subtle shift in policy emphasis, along with a greater focus on ongoing delivery within a local plan period would help to achieve a positive change in behaviours at a local level.....</i></p> <p>The above is also irrespective of the fact that many of the smaller HSA sites are already near completion and at least some the numbers should have potentially been counted before the Plan period. Therefore, these numbers are unlikely to be taken forward in the Adopted Local Plan.</p> <p>In addition, based on last published WBC housing monitoring report (2019), there was a projected windfall allowance of 362 dwellings for the five years up to 2024. To cover the Local Plan Review period to 2037 would suggest a windfall figure of 1,231 dwellings should be included in the supply and not 1979 as currently stated in Table 2 Housing Supply at March 2020.</p> <p>Therefore, there is real danger that the delivery target will not be met due to a reliance on windfalls. This makes very clear that when combined with a lack of flexibility / unclear non-implementation allowance, that there is a need for more allocation sites to bridge the shortfall, in the order at least 700 units.</p> <p>In summary, there is a clear under provision for new sites and further small to medium sites should be considered with flexibility to allow sites on the edge of the urban areas identified to come forward to ensure that sufficient sites can be delivered within the Plan period.</p> <p>Changes sought:</p> <p>It is considered that policies SP1 and SP3 should be reworded to provide more flexibility.</p>	

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	<p>Other nearby Local Planning Authorities have recognised the issue that can arise where a NDP is not delivered. For example, South Oxfordshire District Council in their Policy H1 of the recently adopted Local Plan (but see also their Core Strategy which also contained a similar policy) set out that:  <i>“Where Neighbourhood Development Plans are not progressed in larger villages and market towns, planning applications will be considered against the housing delivery targets for the towns and larger villages set out in this Plan.”</i></p> <p>A form of words reflecting the above, would ensure that there would be sufficient flexibility to take into account any NDP problems and Policy SP1 should be amended accordingly, with and SP3 and DC1 given clarification in this regard. To reflect this and the potential undersupply of housing, further small to medium sites should be also be added to policies SP13-14, with any update to SP12 as a result. Darcliffe Homes are proposing two such sites within the Eastern Urban Area, which would deliver up to 80 dwellings. The supporting text at paragraph 6.22 would also need to be updated in this regard.</p> <p>The addition of further small to medium sites such as these will require a re-consideration of the capacity of the strategic-scale sites to reflect realistic expectations. Revising the site capacities slightly downward to accommodate a shift of dwelling numbers will not however adversely affect the ability of the promoters to bring the strategic sites forward for development, but will allow a longer period for developing out the entirety of the site, which is likely to run into the following Plan period. Allocating additional small to medium sites will also have a positive effect on the smaller scale and local housebuilding industry, which includes Darcliffe Homes, in providing opportunities that will help to continue to sustain this important re-emerging sector of the housebuilding industry.</p>	
Carter Planning Ltd for R L A Jones (lpr1898)	<p>Whilst much of Policy SP 1 is unobjectionable and can be supported objection is raised to the very last sentence.  “Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through Neighbourhood Development Plans”.</p> <p>That is an abrogation of the function of this Draft Plan. Neighbourhood Plans should not be making housing allocations, that is a function of the Draft Plan,</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the principle of the policy is noted.</p> <p>The NPPF is clear that Neighbourhood Plans should not promote less development than set out in strategic policies</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and indeed some such sites, if suggested, may cut across the policies of the Draft Plan.</p> <p>Indeed if the task of allocating housing sites is left to Neighbourhood Plans, especially in Lambourn, either that Plan may not come forward or, more likely, local residents will not want additional housing in their locality leaving the housing requirement unsatisfied.</p> <p>Changes sought:</p> <p>The reliance on allocations through the Neighbourhood Plan process raises questions as to whether the objectively assessed housing needs will be met within the Plan period increasing pressures on other settlements to meet the unmet need.</p> <p>The Council should allocate all housing sites through this Draft Plan and do not leave the task to Neighbourhood Plans. Amend the last sentence of Policy SP1.</p>	<p>and that development can realistically come forward via Neighbourhood Plan allocations without needing to be allocated in the Local Plan. Further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows:</p> <p>‘Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b> ..... <del>New allocations for housing for Cold Ash will be made through a NDP. ....</del></p> <p><b>Eastern Area</b> .... <del>New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</del></p> <p><b>North Wessex Downs AONB</b> .... Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.’</p>
Deloitte for Green Park Reading No.1 LLP (lpr2031)	<p><i>Part of full representation in relation to Green Park, Reading</i> <u>Policy SP1 Spatial Strategy</u> Policy SP1 confirms that the new Eastern Area designation in the Local Plan (which Green Park falls partially within) will continue to be an important area for business development with the retention of Designated Employment Areas and the allocation of an additional site north of Arlington Business Park (located near J12 of the M4). It states: “Employment development to meet the existing and future economic demands for business use will be directed to Designated Employment Areas, to help promote sustainable patterns of development, prioritise the</p>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>use of previously developed land and support the retention of these areas for employment uses”.</p> <p>It is important than Green Park is recognised in the Local Plan as a Designated Employment Area and that the Site is also afforded this protection. This will assist in the protection of an employment area which can meet existing and future economic demands not just for West Berkshire but for Reading and Wokingham Borough Council's too.</p>	
Hallam Land Management (lpr2332)	<p><i>Part of full representation promoting the allocation of Land at Kiln Lane, Mortimer.</i></p> <p>The Spatial Strategy set out in the emerging draft document splits West Berkshire into three distinct areas, with Mortimer being located within the Eastern Area. Within these areas housing is to be allocated to meet both the existing needs and address specific housing requirements within the Strategic Housing Market Area.</p> <p>What is pertinent about the Eastern area, and Mortimer in particular, is its proximity to Reading, with Mortimer station providing a direct link into the Reading conurbation. In this context the following must be taken into account when determining the level of housing growth in the Eastern Area: -</p> <ol style="list-style-type: none"> <li>1. The Reading Local Plan identified a shortfall in housing delivery that would need to be addressed in a neighbouring Borough. The Council will need to engage with other neighbouring areas to establish the level of unmet housing needs and the extent to which this should be addressed in West Berkshire and in particular in the Eastern Area. This debate is complicated at the current time due the uncertainties over the Grazeley New Settlement. However, what is certain is that this Plan cannot simply turn its back on the Grazeley New Settlement, without identifying compensatory development elsewhere in the Eastern Area.</li> <li>2. The Strategic Improvements associated with Crossrail will inevitably bring migration into West Berkshire placing specific pressure on housing within the Eastern Area.</li> <li>3. Additional housing will be required in the Eastern Area to support the economic growth associated with Reading.</li> </ol>	<p>Comments noted.</p> <p>The local authorities which make up the Western Berkshire Housing Market Area (HMA) have agreed a Statement of Common Ground for the purposes of Local Plan-making. This continues to recognise Reading's unmet need set out in the Reading Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading's need as calculated by the Berkshire SHMA, not by any alternative calculations of need.</p> <p>As Reading Borough Council set out in their representation a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology.</p> <p>The shortfall of 230 dwellings was anticipated by Reading Borough Council to arise at the later part of their current plan period. Though the principle of meeting any unmet need within the HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan –making process, before the need arises. Nevertheless the Council accepts that some of Reading's unmet need can in theory be met through our proposal to establish a housing requirement range</p>

Respondent (with lpr ref)	Response	Council Response
	<p>These external factors will put further pressure on the need for housing within the Eastern Area and further iterations of this Plan will need to respond to this housing need.</p> <p>Policy SP 1 sets out the Spatial Strategy for the Eastern Area stating: - There is no provision for further growth to Mortimer beyond that made in the current Neighbourhood Development Plan (NDP). The current adopted NDP has an end date of 2026. The emerging Local Plan covers the plan period of 2020-2037.</p> <p>There is therefore a gap of 10 years between the end of the NDP and the continuation of this emerging Local Plan where no housing is to be delivered to Mortimer. There is no sound justification to support this strategy, particularly as Mortimer is the least constrained of all of the key settlements in the Eastern Area and is furthest away from the AONB.</p>	<p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p> <p>The Grazeley proposal would have largely met the housing needs of the wider Reading area and would have only gone a limited way towards meeting West Berkshire's housing needs. Even without the concerns due to the proximity of AWE, the lead in time for this development meant that it was not considered appropriate to include it in the housing supply for the Local Plan Review period.</p> <p>Apart from Reading, none of the other authorities in Berkshire have advised that they have unmet housing needs.</p> <p>The strategy for the LPR is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p>



Respondent (with lpr ref)	Response	Council Response
		<p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries.</p> <p>Strategic sites in Newbury and Thatcham are expected to deliver housing in the last 10 years of the plan period and beyond while the smaller allocations and existing permissions will deliver throughout the plan period.</p> <p>A trajectory will be prepared to accompany the Reg.19 consultation and will be reviewed annually and reported in the AMR. Progress will be continually monitored and adjustments made to the trajectory.</p> <p>Newbury and Thatcham are the largest settlements in the district and it is appropriate that the focus for development should be here. The Eastern Area is very constrained, with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston. Sites promoted have been assessed through the HELAA and site selection process. The Tilehurst Neighbourhood Development Plan Steering Group have responded to the consultation and stated that they do not now intend to allocate sites for development. Further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows:</p>

Respondent (with lpr ref)	Response	Council Response
		<p>'Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b> ..... New allocations for housing for Cold Ash will be made through a NDP. ....</p> <p><b>Eastern Area</b> .... New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</p> <p><b>North Wessex Downs AONB</b> .... Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.'</p> <p>The indicative housing requirement for Stratfield Mortimer as set out in the draft emerging LPR was zero. The adopted NDP, which is currently being reviewed, includes an allocation for up to 110 dwellings. The allocated site has outline planning permission, and there is a Reserved Matters application pending determination for the first phase of development (28 dwellings).</p> <p>The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Given the outstanding dwellings still to deliver, it is considered that there should be not any additional allocations in the plan period. It is however recognised that</p>

Respondent (with lpr ref)	Response	Council Response
		windfall development may come forward over the plan period.
JSA Architects for Colthrop Village Consortium (lpr744)	<p>Object to policy.</p> <p>Agree that higher densities should be adjacent to transport nodes and corridors. The THA1 site at Rainsford Farm and the former Colthrop Paper Mill is placed alongside Thatcham Railway Station. The West Berkshire Council "Pattern Book" approach to housing densities suggest that this site is detached from the urban area but its boundary is contiguous with the Southern edge of Thatcham and only the Kennet and Avon Canal intervenes. The densities for housing on this site should maximise the edge-of-urban-area location close to a railway node which could be developed into an integrated transport hub with bus, pedestrian and cycle opportunities. The sustainability of this location should not be ignored in favour of the proposed North-East-Thatcham allocation. The two options have not had a fair comparison and the Colthrop Village proposals merit further scrutiny in preference to such a large urban extension to the north-east of the town.</p> <p>Reconsider development in proximity to Thatcham Railway Station and look at higher densities in this area.</p>	<p>Comments noted.</p> <p>Efficient use of land is a government priority and will reduce the need to build on greenfield sites. The policy does include flexibility in relation to densities.</p>
Jeremy Lawn for Terence Gallagher (lpr181)	<p>The spatial strategy enshrined in draft policy SP1 (Spatial Strategy) is strongly supported. However the approach outline in this policy is not reflective of the approach to development in relation to settlements as identified in the NPPF.</p> <p>The draft policy contains a key passage:  <i>“There will be a presumption in favour of sustainable development and redevelopment within the settlement boundaries of those settlements identified in Appendix 3 and outlined on the Policies Map. Outside of settlement boundaries land will be treated as open countryside where development will be more restricted, as set out in Policy DC1.”</i></p> <p>Policy DC1 (Development in the Countryside) makes absolutely clear that outside settlement boundaries (even adjacent to sustainable settlements) properties will be treated as being located in the countryside.</p> <p>The combined effect of both policies will be to draw very tight boundaries around existing built parts of settlements. The approach to identifying</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the spatial strategy is noted.</p> <p>The spatial strategy focuses development on existing settlements, using the settlement hierarchy, to meet identified needs for housing and employment.</p> <p>Policy DM16 set outs the Council’s approach to delivering housing in rural areas via exception sites.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>settlement boundaries is set out in Appendix 3 to the emerging Local Plan. It states (p.230) that the boundaries will include:</p> <ul style="list-style-type: none"> <li>• <i>“...The main settlement area. i.e. the area of close knit physical character.....</i></li> <li>• <i>.....Curtilages which are contained, are visually part of the built up area and are separated from the open or wider countryside..”</i></li> </ul> <p>This is in effect indicating that significant parts of settlements will be regarded as being in ‘open countryside’, an approach which is plainly illogical where those parts of the settlements that are currently outside settlement boundaries continue to play an important role in both contributing Council Tax towards the settlements in question, providing support for local services and facilities, and providing dwellings that are generally counted as forming part of the settlements for Office for National Statistics purposes. The NPPF supports development that is sustainable in all three objectives (social, economic and environmental) (para 8). In recognising the role that dwellings in rural settlements play in supporting local services and facilities (the social and economic elements of sustainable development), the NPPF confirms (paragraph 78) that residential development in rural areas: <i>“...should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”</i></p> <p>This approach is very much aimed at recognising the value that those existing dwellings towards the edge of settlements such as Streatley and Goring play in terms of helping to achieve sustainable development. However there is no recognition in the policies of the draft Local Plan of the role such dwellings play in supporting their local settlements. This is a significant omission given the important role that these edge of settlement dwellings play in the helping to maintain the viability of the settlements in question.</p>	
Lochailort Newbury ltd (lpr2038)	We support the “town centre first” strategy and the sequential approach within it. We also support the presumption in favour of sustainable	Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.

Respondent (with lpr ref)	Response	Council Response
	<p>development and that the redevelopment of previously-developed land within defined settlement boundaries will be acceptable in principle.</p> <p>Changes sought: To ensure consistency with the above changes to draft Policy RSA1, draft Policy SP1 should be amended to read “Other developments will include redevelopment of previously developed land, including a substantial element of residential use as part of a town centre mixed use development at the Kennet Centre (Policy RSA1).”</p>	<p>The spatial strategy focuses development within the settlement boundaries of those settlements within the settlement hierarchy, on previously developed land.</p>
LRM Planning for Bloor Homes & Sandford Farm (lpr2171)	<p>The Core Strategy’s current spatial strategy is based on a settlement hierarchy that distributes new development in accordance with the role and function of the District’s towns and villages in order to achieve a sustainable pattern of development, as required by national planning policy.</p> <p>Core Strategy Policy ADPP1 identifies the District’s urban areas – Newbury, Thatcham, Eastern Urban Area (Tilehurst, Calcot and Purely on Thames). The existing urban areas were regarded as <i>“the most suitable locations for future development by virtue of their existing access to services and facilities, thereby providing the opportunity to reduce out-commuting and the need to travel”</i> and thus the <i>“focus for the majority of development”</i>.</p> <p>Of these urban areas, Newbury serves as the District’s administrative centre and as the principal focus for new development. Core Strategy Policy ADDP2 intended that over half of the new housing in the District would be provided at Newbury to contribute to its role and function as the largest urban area.</p> <p>In this regard, we note that the Settlement Hierarchy Topic Paper (November 2020) refers to the urban areas as having a wide range of services and opportunities for employment, community and education whilst serving a large catchment area with good levels of accessibility and frequent public transport provided to a large number of destinations.</p> <p>As the Interim Sustainability Appraisal (December 2020) notes, in comparison with Newbury and Thatcham, other spatial areas are more constrained.</p> <p>Accordingly, and whilst the settlement hierarchy was reviewed for other settlements, the urban areas that the Plan identifies are rightly the same as in the Core Strategy.</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>In reviewing the Local Plan, the District Council should take into account changing circumstances affecting the area, or any relevant changes in national policy. Evidently, in terms of spatial planning, the characteristics of the District have not changed and it remains wholly appropriate as a matter of principle for Newbury to continue to be the focus for new development and this would be consistent with national planning policy in the 2019 NPPF. We note from the Interim Sustainability Appraisal that this policy approach scores significantly positive on the objective for delivering housing (1) with other significant positive effects demonstrated for objectives relating to efficiency of land use (7), in supporting a strong, diverse and sustainable economic base (10), improving health, safety and wellbeing (2), and improving accessibility to community infrastructure (3). Similarly, positive effects are assessed for objectives of maximising opportunities for safe and sustainable travel (4), of conserving and enhancing the character and distinctiveness of the natural, built and historic environment (5) and of reducing emissions contributing to climate change (9).</p> <p>Accordingly, we support Policy SP1 where the focus of new development in each of the three spatial areas will follow the District-wide settlement hierarchy.</p> <p>The continued allocation of Sandford Park, also referenced in Policy SP1, is consistent with this established policy approach and we also support this.</p>	
Nexus Planning Ltd for Pangbourne Beaver Properties (lpr1651)	<p>Object to policy.</p> <p>In general terms we agree with the proposed spatial strategy for future development within the District as set out in Policy SP1 It is based on an approach focussing on three broad spatial areas and, within each of those, a strategy of following the District-wide settlement hierarchy that has regard to the function and sustainability of settlements and promote sustainable communities. More specifically, we support a strategy for the North Wessex Downs AONB spatial area that seeks to ensure appropriate and sustainable growth that has regard to its special landscape qualities i.e. recognising that there is a balance to be struck between the need for housing in this area and its special landscape qualities.</p> <p>However, as set out elsewhere in our representations we object to the application of this spatial strategy, most notably in Policy SP15, which fails to allocate any additional housing at Pangbourne despite the fact that it is one</p>	<p>Comments noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3. Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints. The primary consideration within the AONB must be the conservation and enhancement of the natural beauty of the landscape. The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>of the most sustainable Rural Service Centres in the District and the fact that development is proposed in equally more constrained locations which are less sustainable based on the Council's own evidence. As a consequence, the Council's own objective in Policy SP1 i.e. to deliver 'appropriate and sustainable growth' in the North Wessex Downs AONB area will not be met. Changes sought:</p> <p>To ensure that Policy SP1 is applied in an appropriate and sustainable way, and to ensure that the emerging Local Plan is internally consistent, Policy SP 15 must be amended to ensure that a site/sites at Pangbourne are identified for housing. For the reasons set out in our representations to Policy SP15, this should include the allocation of 35 – 40 dwellings at Site Ref: PAN8 (Pangbourne Hill).</p>	
Pegasus Group on behalf of Donnington New Homes (lpr1941)	<p>The identification of Newbury as the continued focus for new development is <u>welcomed</u> together with the confirmation that Sandlesford Park is a key part of that focus. The Policy, however, states that Sandlesford Park will be a '<i>new urban extension</i>'. Technically this is an inaccurate reference as Sandlesford Park has been allocated since 2012 through the Core Strategy. A more accurate description of the continued allocation would be a '<i>redefined urban extension that will continue to be the focus of development</i>'.</p>	<p>Comments noted.</p> <p>Amend the policy as follows –  '<i>Newbury will be a focus for housing development. A new An urban extension on greenfield land to the south of Newbury, at Sandlesford Park will provide a new residential neighbourhood.....</i>'</p>
Pegasus Planning Group Ltd for Newbury & Crookham Golf Club (lpr2048)	<p>Support policy.</p> <p>This policy states that the overall approach to development will be based on three spatial areas:</p> <ul style="list-style-type: none"> <li>• Newbury and Thatcham</li> <li>• Eastern Area</li> <li>• North Wessex Downs AONB</li> </ul> <p>Newbury is identified as a focus for housing development. NCGC (Newbury and Crookham Golf Club) is located on the south-eastern edge of Newbury. Therefore, in accordance with policy SP1, it is a suitable and sustainable location for housing development.</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.</p>
Pegasus Planning Group Ltd for Calcot Park Golf Club (lpr2319)	<p>Support policy.</p> <p>This policy states that the overall approach to development will be based on three spatial areas:</p> <ul style="list-style-type: none"> <li>• Newbury and Thatcham</li> </ul>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Eastern Area</li> <li>• North Wessex Downs AONB</li> </ul> <p>Calcot is within the Eastern Area, which is identified as a focus for housing development. Calcot Park Golf Club (CPGC) is located on the eastern edge of Calcot, within the greater Reading conurbation. Therefore, in accordance with policy SP1, it is a suitable and sustainable location for housing development.</p>	
Planning Potential Ltd for Aldi Stores (lpr2287)	<p>We understand the general aim of Policy SP 1 'Spatial Strategy' and consider that optimising the use of previously developed land will ensure that sustainable development can be delivered. It is also acknowledged that town centres will continue to play an important role for communities and will need to adapt to meet the changing needs of communities, and the implications of Brexit and the Covid-19 pandemic. However, at the same time, the Council should also ensure that it adopts a flexible approach when considering sites outside these areas that comply with retail policy tests and other technical considerations, and provide an improved and accessible retail offer for the local population.</p> <p>It is important to note that retail is an important contributor and critical element to the economy, due to the significant investment achieved through keeping spending local and the job opportunities created. This is in addition to the community benefits of providing accessible, and affordable weekly and top-up food shopping destinations, providing high-quality low priced goods.</p> <p>Introducing an Aldi store to an area reduces the need to travel further afield. Keeping the spending local not only has benefits to the environment through reduced travel, but also retains expenditure in an area, and increases the likelihood of spending taking place in other facilities rather than outside the area. Furthermore, as set out above, a new Aldi store provides approximately 40 new local job opportunities, paying its 'shop floor' staff market leading wages, and has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team. Aldi's on-going graduate scheme secures an annual intake for the</p>	Comments noted.



Respondent (with lpr ref)	Response	Council Response
	<p>Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK wide programme. Aldi also offers a large number of other positions within the stores, which include <b>full</b> and part time jobs, and Aldi devise contracts that fit around people's other existing commitments. In addition, the development of new Aldi stores provide a significant contribution to the construction industry, which again benefits the local economy. A number of contractors and skills are required during the build of a new Aldi store, many of which are sourced from the local area.</p> <p>In light of this, we consider the Local Plan policies in respect of economic development should be amended to better reflect the benefits an Aldi store has to the economy, the high quality nature of retail jobs, and the other investment benefits a new store or improvements to an existing store bring to an area.</p>	
Prosper Infinity Ltd. (lpr176)	<ol style="list-style-type: none"> <li>1. Avoid using greenbelt or undeveloped land where possible.</li> <li>2. Suggesting a redevelopment site in Thatcham (Newbury Leisure Park) that is brownfield i.e. developed upon and entirely hardstanding and demonstrates it is in a sustainable location.</li> </ol>	<p>Comments noted.</p> <p>There is no greenbelt land within West Berkshire.</p> <p>The spatial strategy focuses development within the settlement boundaries of those settlements within the settlement hierarchy, on previously developed land.</p>
Pro Vision for CALA Group Ltd. (lpr2412)	<p><i>In context of two sites: East and West of Salisbury Road, Hungerford.</i></p> <p>The proposed spatial strategy makes policy decisions about how to apportion the development needs across the spatial areas. "Modest", or more accurately, very modest, growth is proposed to be directed to the AONB area.</p> <p>Specifically within Hungerford, the main settlement of the AONB area, what does the evidence base say about local need?</p> <p><b>Affordable housing</b></p> <p>In terms of the published evidence base, noting that the Strategic Housing Market Assessment has not been updated since 2016, a key evidence document for the LPR is the Updated Housing Need Evidence (UHNE)9, which provides information on the need for affordable housing.</p>	<p>Comments noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>This report does not appear to drill down to specific settlements, but does give useful information of need by spatial area.</p> <p>The UHNE identifies a need for 101 affordable homes per annum in the AONB spatial area. That equates to 1,515 affordable homes over the plan period.</p> <p>This need is described as “substantial” and “the Council is justified in seeking to maximise the provision of affordable housing on eligible development sites, subject to viability”.</p> <p>Indeed, the report invites the Council to “consider through plan-making process whether higher housing provision would have positive benefits on affordable housing delivery”.</p> <p>Noting the proposed spatial strategy is for 500 homes in total (open market and affordable) across the spatial area, there is no prospect whatsoever of the need being met through this plan. The draft plan is planning to fall well short of meeting the need, especially in the AONB spatial area.</p> <p><b>Need in Hungerford</b></p> <p>There appears to be no published evidence behind the LPR on specific need for Hungerford.</p> <p>In summary therefore, there is likely to be capacity for more development in Hungerford than the proposed housing requirement, a requirement which falls well short of meeting local need. The proposal to constrain the amount of development in the AONB, and Hungerford in particular, is likely to have significant social and economic impacts. A more balanced approach to meeting the three strands of sustainable development is needed.</p> <p><b>Sustainability Appraisal</b></p> <p>The SA appraisal demonstrates that significantly boosting the supply to 692 dpa has the greatest impact on meeting the affordable housing need and is scored ‘significantly positive’.</p> <p>Nonetheless, it is noted that this level of growth may have negative effects on several environmental objectives. Overall, this option is scored ‘neutral’, with the other two options scoring ‘positively’. However, it is noted that the SA appraisal scores options ii and iii the same with regards to economic benefits (i.e. SA Objective 10), but clearly a significant increase in housing delivery more closely supports delivering this SA Objective.</p> <p>The Council should be concerned that limiting the housing supply to deliver</p>	<p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the minimum requirement or with only a 10% buffer will significantly restrict the housing supply and therefore, amongst other issues, will further raise house prices to levels which create cost barriers to local residents and workers. As a result, not adequately addressing the affordability problems and lack of affordable housing across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered within the SA appraisal. it is considered that the SA, an important part of the evidence base that will require scrutiny at examination stage, currently fails to provide clear and credible reasons for selecting the 520-575 dpa as its preferred approach, and which does not support the Council's 'Vision' for the Local Plan to address affordability as a priority. Accordingly, the current approach within the LPR is unlikely to be justified and the plan would be vulnerable to be found unsound at examination</p>	
Pro Vision for CALA Homes (lpr2363)	<p>Rep made in reference to Land at Waller Drive, Newbury (CA10 HELAA reference), part of wider representation. The site is bisected by the Cold Ash Parish Boundary and within the settlement boundary. The site is previously developed and operating as a mixed use commercial site, including scrap yard and slaughter house.</p> <p>We support Policy SP1 in its clear objective to “optimise the use of previously developed land” and “optimise the density of development to make the best of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment”.</p> <p>This accords with the NPPF, which guides that policies should also support ? ensuring that where there is available and suitable previously developed land (PDL), proposals should optimise the development potential, and that proposals should be refused where they fail to make efficient use of the developable land<sup>5</sup>. This is especially so in local authority areas where there is a high degree of constraint, such as West Berkshire with a very significant proportion designated as an Area of Outstanding Natural Beauty (AONB).</p> <p>As drafted, the policy only emphasises town centres where higher densities are likely to be appropriate. It should be amended to clarify that suitable PDL sites, whether or not they are town centres are also likely to be appropriate for higher density development, albeit the precise density should reflect matters such as accessibility and local context, including neighbouring land</p>	<p>Comments noted.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>uses.</p> <p>The HELAA identifies that site CA10 is “suitable” for residential development. It indicates that the site capacity is around 42 dwellings. We consider that this is likely to be an underestimation of the site’s capacity (at pre-application stage, a scheme of 65 dwellings was discussed), especially noting the NPPF’s clear objective to make efficient use of previously developed land.</p> <p>Development of the site provides opportunity to remove the existing uses (including scrap yard), which are no longer complementary to the predominately residential development that has grown up around it. A high quality residential scheme would improve the local environment and provide a better neighbouring for this predominantly residential neighbourhood.</p> <p>The pre-application advice asserted that development of the site for residential uses, would entail the loss of some employment land. The employment currently generated by the site, however, is very low and it is not actually an employment site, comprising instead of sui generis uses, quite separate from the Turnpike Industrial Estate to the south. As noted above, there would be obvious improvements to amenity through regeneration of the site.</p> <p>Allocation would encourage the site to come forward early in the Plan period, which will help supply in the early years, noting that significant proportions of the strategic allocations (Sandleford Park and North East Thatcham) are not planned to deliver in the plan period.</p> <p>Both of these proposed strategic sites have significant infrastructure requirements, therefore will take some considerable time to go through the planning permission process and deliver homes. We note that strategic development proposals at Sandleford have already been refused twice, since allocation in the Core Strategy.</p> <p>An allocation in the Plan would also accord with the NPPF, which notes that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area”.</p> <p>The NPPF goes onto note this is because smaller sites can be built out relatively quickly, compared to the larger, strategic allocations, such as Sandleford Park and North East Thatcham. While site CA10 is larger than 1 hectare, it still falls more comfortably in this category than a large strategic</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>site and is therefore likely to deliver significantly more quickly than the draft strategic allocations.</p> <p>The evidence base explains that the Council is not intending to allocate non-strategic sites within settlement boundaries as the principle of development is already established. CA10 warrants consideration as a strategic site allocation, given its potential development capacity (which would otherwise be a very significant windfall site).</p> <p>Site CA10 should also therefore be included on the Council's Brownfield Land Register, in line with the NPPF, which states that "Local planning authorities, and other plan-making bodies, should take a positive a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs".</p>	
Pro Vision for Mr and Mrs Mathew Pittard (lpr1957)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached as a response to Policy SP13</i></p> <p>Policy SP1 confirms that the focus of development in the District's three spatial areas "will follow the District-wide settlement hierarchy set out in policy SP3 which takes account of the function and sustainability of settlements across the District and promotes sustainable communities." This is an appropriate strategy, focusing new development in the most sustainable parts of the District, as confirmed by the policy's supporting text (paragraph 4.18).</p> <p>Paragraph 4.10 confirms that "The Newbury and Thatcham urban area is the main focus for development in the current Local Plan and will remain the focus in the Local Plan Review." At the time of preparing the current Local Plan, this part of the District was concluded to be the most sustainable spatial area to deliver the majority of new development. In light of this, the case for focusing new development in this location is even stronger now, given the level and range of existing facilities, services and infrastructure in the area, as well as those currently coming forward.</p> <p>Policy SP1 sets out that the spatial strategy "will deliver a range of site sizes for residential development." This is supported and is in line with national policy. Paragraph 67 of the NPPF explains that "planning policies should identify a sufficient supply and mix of sites". Furthermore, paragraph 68 explains that "Small and medium sized sites can make an</p>	<p>Comments noted.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly</i>” and that local planning authorities should “<i>promote the development of a good mix of sites</i>”. To add to this, a mix of large, medium and smaller scale sites enables housing needs in different parts of the District to be met.</p> <p>Policy SP1 introduces the proposed new urban extensions to the south of Newbury at Sandleford Park and to the north east of Thatcham. Large sites such as these – while capable of delivering a large quantum of new housing – are often complicated and take some time to start delivering housing. The importance of small and medium sized sites should therefore not be understated. Our recommendations in this regard as provided later in these representations.</p>	
Ptarmigan Group (lpr2345)	<p>The spatial strategy, outlined in draft Policy SP1, to direct employment development to meet the existing and future economic demands for business use to Designated Employment Areas (DEAs) is supported in principle. DEAs, such as Colthrop Industrial Estate, will play a vital role in meeting the existing and future economic needs of the District. The specific reference to Thatcham remaining one of two towns upon which business development should be focused is also supported in principle.</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.</p>
Royal & Sun Alliance PLC (lpr2108)	<p><i>Part of full representation on behalf of Royal &amp; Sun Alliance Insurance promoting residential development at Greenham Road Retail Park.</i></p> <p>Policy SP1 sets out the Council’s strategic policy on delivering its spatial strategy for the District. Key to its strategy is an acknowledgment that development will:</p> <ul style="list-style-type: none"> <li>• Direct development to areas of lower environmental value;</li> <li>• Optimise the use of previously developed land; and</li> <li>• Optimise the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identify of the built, historic and natural environment.</li> </ul> <p>We consider this general policy approach to be logical and compliant with national policy, where these principles are reinforced. Policy SP1 goes on to note that the spatial strategy will focus development in locations that correspond with the District’s settlement hierarchy, whereby Newbury and</p>	<p>Comments noted.</p> <p>The spatial strategy focuses development on existing settlements, using the settlement hierarchy, to meet identified needs for housing and employment.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Thatcham are given the highest status as Urban Areas. Focusing on Newbury, the Plan states that:  <i>“Newbury will... continue to fulfil its key role as the major administrative centre and major town centre for the District... Newbury will be a focus for housing development”.</i></p> <p>It is imperative that the objectives of Policy SP1 are actually reflected in the Council's site selection strategy and approach to site allocations, which we consider requires immediate attention. We highlight our key concerns below. The Council is proposing a number of housing allocations outside of current settlement boundaries and in its smaller settlements. With this in mind we suggest that the Council must focus on maximising development for residential development on its pool of brownfield sites in its key settlements. This should focus on Newbury given the Council accepts that it represents the District's primary settlement. This approach would better serve the Council's strategic policy objectives under Policy SP1 and accord with national policy, which notes that “substantial weight” must be given to the value of reusing brownfield land (Paragraph 118).</p> <p>It is also vital that the Council gives due weight to the need to protect designated land (including AONB land) which is afforded the highest status of protection by the NPPF. The draft Plan proposes to allocate a number of sites in the North Wessex Downs AONB, on sites in Hungerford and Lambourn for example. Paragraph 171 of the NPPF makes clear that Councils must protect valued landscapes and must instead “allocate land with the least environmental or amenity value”. Paragraph 172 of the NPPF explicitly states that great weight should be given to conserving AONB land and that the scale and extent of development within AONB areas should be limited.</p> <p>AONB land can therefore only be identified for allocation when the scope for developing outside of designated areas has been ruled out. The current approach is not justified because alternative sites have not been duly considered to date.</p> <p>Policy SP1 also outlines the Council's emerging policy on development density. Said policy explains that development should secure at least 70 dwellings per hectare for flatted developments along main transport routes and close to transport nodes. We welcome the Council's acknowledgement</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>that sites in such locations would be appropriate for higher density development than other less sustainable locations in the District. However, the Council must not impose an arbitrary ceiling on development capacity in areas of the District that could sustainably accommodate a greater quantum of development, given the Council's substantial development needs. Our client's site would be a highly suitable location for high density development. It could accommodate substantially more development through a design-led response, rather than through application of a units per hectare policy approach. The potential for impacts on the surrounding area could be dealt with through a sensitive design response without need to stymy development in this location through an overly restrictive policy approach.</p> <p>We also draw the Council's attention to the Government response (dated December 2020) to the local housing need proposals that were presented in the White Paper. This response makes clear that planning authorities must prioritise brownfield and underutilised urban sites and facilitate building at higher densities.</p> <p>We therefore recommend that the Council reviews its assumptions for suitable densities in urban locations, not least given the housing challenges the District faces in light of its environmental constraints.</p>	
Savills for Englefield Estate Office (lpr1524)	<p>The overall proposed spatial strategy set out in draft LPR Policy SP1 generally reflects that of the adopted Core Strategy, with new residential and employment development predominantly focused towards Newbury and Thatcham. Indeed there appears to now be an even greater focus towards Newbury and Thatcham, as a result of the extension of the Detailed Emergency Planning Zone (DEPZ) at Burghfield and the '<i>significant constraints</i>' (paragraph 4.13) in the newly-defined Eastern Area, as well as the continued overarching aim to conserve and enhance the North Wessex Downs Area of Outstanding Natural Beauty (AONB).</p> <p>It is noted that Newbury and Thatcham is the most sustainable location for development in the district, as evidenced in the Settlement Hierarchy Review Topic Paper (November 2020), and that the National Planning Policy Framework (NPPF) (2019) seeks to direct development to the most sustainable locations (paragraph 67). However, it is important that an</p>	<p>Comments noted.</p> <p>The strategy is to focus development on those settlements within the settlement hierarchy. Thatcham sits at the highest level in the settlement hierarchy in West Berkshire with a range of facilities and services and a high level of accessibility. The urban areas are regarded as the prime focus for housing and economic development to meet the identified needs for housing and employment purposes.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers</p>



Respondent (with lpr ref)	Response	Council Response
	<p>appropriate amount of development is also allowed for at other settlements to ensure that housing needs are met across the district and that the vitality of other settlements (e.g. Burghfield Common, Mortimer and Theale) is maintained. Whilst the Eastern Area has constraints, these are subject to change and are not insurmountable (e.g. DEPZ, flood risk etc.), and therefore a positive and proactive approach should be taken to addressing these issues and accommodating sustainable development, in line with NPPF paragraph 119.</p> <p>This is even more important given that large sites at Newbury and Thatcham which were allocated in the Core Strategy and Housing and Site Allocations DPD (including the 2,000 home allocation at Sandleford Park) have been delayed in coming forward. This has contributed to lower levels of housing delivery during the Core Strategy plan period and a shortfall against the Core Strategy requirement, as set out in the Annual Monitoring Report 2019 (January 2021). It is important therefore that sufficient housing is planned for in other sustainable parts of the district such as the Eastern Area.</p> <p>In seeking to accommodate some development in the Eastern Area, draft LPR Policy SP1 states that <i>'New allocations for housing for Tilehurst and Burghfield will be made through NDPs.'</i> However, draft LPR Policy SP14, whilst noting the designated Burghfield Neighbourhood Area, makes no allowance for housing in the Burghfield Neighbourhood Plan. No reason is provided for this omission. However, if this is due to the recent extension of the DEPZ for AWE Burghfield, further clarity is required. It is important to note that the extension of the DEPZ is currently subject to a Judicial Review (the outcome of which is not yet known) and may also be subject to changes of inputs to the ONR's model (as noted at LPR paragraph 4.47). In addition, taking into account the role of Burghfield Common in the district (noted further below), provision is required for some additional housing to be identified through the Burghfield NDP in order to ensure certainty of future housing supply.</p> <p>Draft LPR Policy SP1 also makes no reference to the potential for additional housing supply at Mortimer, one of the largest settlement in the Eastern Area. Notably the village is located just outside the DEPZ (Figure 4) and is therefore less constrained to accommodate development in the Eastern Area. Draft LPR Policy SP14 acknowledges the 110 units allocated in the</p>	<p>of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries.</p> <p>Strategic sites in Newbury and Thatcham are expected to deliver housing in the last 10 years of the plan period and beyond while the smaller allocations and existing permissions will deliver throughout the plan period.</p> <p>A trajectory will be prepared to accompany the Reg.19 consultation and will be reviewed annually and reported in the AMR. Progress will be continually monitored and adjustments made to the trajectory.</p> <p>The Council remains committed to the delivery of Sandleford Park as the most appropriate location in Newbury for significant residential development. The Thatcham Strategic Growth Study has considered viability and further whole plan viability work has been undertaken and will be published with the Regulation 19 consultation. The emerging plan assumes delivery of at least 1,000 units at Sandleford Park and 1,250 at North West Thatcham by 2039. This is not considered unrealistic. Using evidence from Lichfields research report 'Start to Finish' of Feb 2020 average rates for large sites are assumed to be 160 dpa for sites of 2,000 plus and 107 for sites of 1,000 to 1,499. Using these delivery rates would entail first completions on Sandleford Park in 2027/28 and at North East Thatcham by 2028/29 to achieve delivery of the numbers assumed in the housing supply calculation.</p> <p>The Grazeley proposal would have largely met the housing needs of the wider Reading area and would have only gone a limited way towards meeting West Berkshire's housing needs. Even without the concerns due to the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Stratfield Mortimer Neighbourhood Plan, however this only covers the period to 2026 and therefore does not account for the LPR plan period to 2037. Given the sustainable and relatively unconstrained location, the LPR spatial strategy should therefore make additional provision for development at Mortimer.</p> <p>It is welcomed that draft LPR Policy SP1 states that the Eastern Area will <i>'continue to be an important area for business development'</i>. It is important that the LPR therefore allows for a range of economic development to come forward in the area, including development to support the rural economy (as noted further below) in order to support this objective.</p>	<p>proximity of AWE, the lead in time for this development meant that it is not considered appropriate to include it in the housing supply for the Local Plan review period.</p> <p>The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Given the outstanding dwellings still to deliver, it is considered that there should be not any additional allocations in the plan period. It is however recognised that windfall development may come forward over the plan period.</p> <p>Newbury and Thatcham are the largest settlements in the district and it is appropriate that the focus for development should be here. The Eastern Area is very constrained, with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston. Sites promoted have been assessed through the HELAA and site selection process. The Tilehurst Neighbourhood Development Plan Steering Group have responded to the consultation and stated that they do not now intend to allocate sites for development. Further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows: 'Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b></p>

Respondent (with lpr ref)	Response	Council Response
		<p>.....  <del>New allocations for housing for Cold Ash will be made through a NDP. ....</del></p> <p><b>Eastern Area</b>  .....  <del>New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</del></p> <p><b>North Wessex Downs AONB</b>  .....  <del>Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.'</del></p> <p>The Council believes a buffer of approximately 10%, expressed through the use of a range in the housing requirement is sufficient to provide flexibility to meet at least the LHN. The Council has a healthy five year supply of housing sites and the plan will be subject to continuous monitoring and 5 yearly review.</p> <p>The majority of allocated sites have planning permission or applications pending decision. The deliverability has also been assessed through the LPR process. It is not considered necessary to add a 10% non-implementation rate to those few sites that are yet to receive planning permission.</p> <p>The current Local Plan allocations were always intended to deliver towards the end of the plan period, with the strategic allocation at Sandleford Park originally phased for the latter half of the plan period. The HSA DPD was only adopted in 2017 and the vast majority of sites now have planning permission and delivery on those with permission is increasing, broadly in line with expectations.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Similarly for non-allocated sites it is not considered necessary to add a 10% non-implementation rate. There is no evidence to support a 10% rate and there is flexibility already built into the plan.</p> <p>Opportunities for limited development in the smaller villages of the District may arise through the review of settlement boundaries.</p>
Solve Planning for Emily West (lpr142)	<p>Support policy. The policy includes recognition of the importance of sites on the edge of settlements in providing housing sites. We support the identified role of Newbury as one of the two key centres of the Borough.</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.</p>
Solve Planning for Emily West (lpr1422)	<p>The policy includes specific density ranges for housing developments depending on the proposed location. The inclusion of density ranges is not helpful and the development of a site should be based on an assessment of prevailing character rather than a specific density range.</p> <p>Changes sought: Removal of density ranges and reference instead the role of the prevailing character in establishing an appropriate density.</p>	<p>Comments noted.</p> <p>Efficient use of land is a government priority and will reduce the need to build on greenfield sites. The policy does include the flexibility regarding densities, depending on site specific issues.</p>
Southern Planning Practice Ltd for the Saunders Family (lpr2115)	<p><i>(Part of full representation, in relation to land at Coombe Bottom Farm, Streatley)</i> Paragraph 4.16 of the Local Plan Review Consultation document sets out that the Core Strategy planned for the delivery of up to 2,000 homes over the period 2006 – 2026 in this area. Whilst it is acknowledged that the Inspector required this to be a maximum amount in view of the national landscape designation, it should be acknowledged that the identified housing need has increased and additional development to meet the identified need is still required, especially beyond 2026. As such, over the remaining 11 years of the plan period (up to 2037) the Council should look to small-medium sites such as the land at Coombe Bottom Farm to help meet the</p>	<p>Comments noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>identified need. In order to have a robust five year land supply, West Berkshire council must look to all settlement tiers in the hierarchy to deliver homes through a range of small, medium and strategic sites, including those within the North Wessex Downs AONB where a landscape-led approach is adopted. By allocating a range of sites in sustainable settlements, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements.</p> <p>Policy SP1 sets out that the North Wessex AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities as set out in policy SP2. It states that allocations for housing in Hungerford, Lambourn, Compton and Heritage will be made through Neighbourhood Plans. Whilst we support this approach, we believe the policy should be amended to include the provision of new development in other sustainable settlements in the AONB, including Streatley.</p>	<p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>
Southern Planning Practice Ltd for the Saunders Family (lpr1923)	<p>We support the Council's approach to splitting the district into three spatial areas, given the vast differences between need and constraints in each area. It is acknowledged that Newbury will be a focus for housing development, and we encourage this approach. We appreciate Sandleford Park (Policy SP16) is one of the biggest allocations in the Local Plan Review, however we note that the Council have twice now refused planning permission for residential development on the site. It is understood that an appeal has recently been submitted to get an independent view from the Planning Inspectorate on the proposed development.</p> <p>Given, the above, it is considered that the strategic allocation will not deliver the number of homes that it was intended to as per the allocation in the adopted Local Plan. In light of this, there is likely to be a shortfall in West Berkshire's housing land supply, therefore we believe that the Council should be looking to allocate more sustainable sites for residential development to 'bridge' the gap and provide the homes the district needs.</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the spatial strategy is noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p>
Sovereign Housing Association Ltd (lpr2158)	<p>SHA broadly supports the councils Development Strategy policies set out in section 4 of the LPR, focussing development at the Market Town location of Newbury and Thatcham, the Eastern Urban Areas (EUA) of Tilehurst, Calcot, Purley on Thames and the Rural Service Centres. We also strongly</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the spatial strategy is noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>support the Service Villages realising non-strategic development potential. Whilst the authority is heavily constrained by AONB meaning growth at the Market Towns and EUA is the logical focus for development, it is important the plan recognises the needs of its more rural settlements where demand is high and affordability acts as a barrier to home ownership. SHA support the inclusions of the Service Villages as a location for modest growth to address local affordability and ensure there is variety and flexibility in the councils land supply.</p>	<p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p>
Thames Water (lpr2147)	<p>Further to Thames Water's separate statutory undertaker consultation response to the Local Plan Review, this response is made to the consultation by Thames Water as a landowner.</p> <p>The overall proposed spatial strategy set out in draft LPR Policy SP1 generally reflects that of the adopted Core Strategy, with new residential and employment development predominantly focused towards Newbury and Thatcham. Indeed there appears to now be an even greater focus towards Newbury and Thatcham, as a result of the extension of the Detailed Emergency Planning Zone (DEPZ) at Burghfield and the 'significant constraints' (paragraph 4.13) in the newly-defined Eastern Area, as well as the continued overarching aim to conserve and enhance the North Wessex Downs Area of Outstanding Natural Beauty (AONB).</p> <p>It is noted that Newbury and Thatcham is the most sustainable location for development in the district, as evidenced in the Settlement Hierarchy Review Topic Paper (November 2020), and that the National Planning Policy Framework (NPPF) (2019) seeks to direct development to the most sustainable locations (paragraph 67).</p> <p>However, large sites at Newbury and Thatcham that were allocated in the Core Strategy and HSADPD (including the 2,000 home allocation at Sandleford Park) have been delayed in coming forward. This has contributed to lower levels of housing delivery during the Core Strategy plan period and a shortfall against the Core Strategy requirement, as set out in the Annual Monitoring Report 2019 (January 2021). It is important therefore that this shortfall is addressed.</p>	<p>Comments noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The KPL land at Speen provides the opportunity to do this and as set out below the site is available and deliverable, without any barriers to its allocation in the LPR.</p>	
<p>Turley Associates for A2 Dominion Housing Group (lpr1495)</p>	<p>A2Dominion broadly agree with the overall strategy for the District set out under Policy SP1.  We note within the policy text '<i>there will be a presumption in favour of sustainable development and redevelopment within the settlement boundaries</i>'.  However A2Dominion consider that the wording of the policy, and a presumption against development outside settlement boundaries has the potential to restrict development from delivered which might help to support the vitality of settlements, address local affordability issues and create vibrant places to live.  Notwithstanding this, we note there is the risk of internal inconsistencies within the draft Local Plan. Policy SP1 makes clear the Council's stance against development outside settlement boundaries, yet Policy DC18 (Specialised Housing) sets out a presumption in favour of specialised housing developments:  <i>"There is a presumption in favour of new housing designed to meet the needs of those with identified support of care needs where:</i>  <i>b) The location is appropriate, in terms of accessibility of facilities, services and public transport"</i>  We note that criterion b of the policy text does not specify that specialised housing developments are required to be located inside adopted settlement boundaries in contrast to the text in Policy SP1. The only location criterion with Policy DC18 is that  <i>"The location is appropriate, in terms of accessibility of facilities, services and public transport"</i>.  A2Dominion consider that the Local Plan should be clarified so that it provides flexibility in order to support the delivery of specialised housing to address the needs of different groups (for example as envisaged through Policy DC18). Considering such a proposal and whether the "location is appropriate, in terms of accessibility of facilities, services and public transport" may imply that a location outside of a settlement meets that definition. In our submission that is an appropriate solution given the lack of</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Broad agreement with the spatial strategy is noted.</p> <p>Policy DM18 sets out the approach to providing specialised housing and criteria for proposals for the development of specialised housing that come forward.</p>

Respondent (with lpr ref)	Response	Council Response
	alternative schemes proposed for such uses within defined boundaries. If the Local Plan does not provide the flexibility for specialised housing schemes to come forward in that way then it is unlikely the identified need of an important (and growing) group of the community will be met.	
Turley for Panattoni (lpr2381)	<p><i>Full representations by Turley on behalf of Panattoni, supporting allocation of land to the north of the A4, Theale for employment development, are attached with extracts below.</i></p> <p>In general Panattoni support the principles laid out by Policy SP 1 and support that the site would become a Designated Employment area.</p>	Comments noted. No changes to the policy are required in light of this representation. Support for the principles of the spatial strategy is noted.
Turley for Pangbourne College (lpr2353)	<p>Pangbourne College generally supports the Council's strategic objective for housing which seeks to ensure that the identified housing needs will be met across the District up to the end of the plan period, but contends that the proposed approach is flawed in respect of the lack of growth directed to Pangbourne and in its failure to properly plan for the needs of the ageing population.</p> <p>Pangbourne is identified within the adopted Development Plan, and in the emerging Local Plan Review as a Rural Service Centre alongside Burghfield Common, Lambourn, Hungerford, Mortimer and Theale, whilst the centre of the village is identified as a District Centre. When interrogated, the Council's settlement hierarchy review, identified Pangbourne as the third highest scoring location behind Hungerford and Theale.</p> <p>Despite this there is no proposed development allocated to Pangbourne and no intention for development to come forward through a Neighbourhood Plan which is identified as the route for housing being delivered in Hungerford, Lambourn, Compton and Hermitage. We have been unable to establish a reason for this, the emerging plan is surprisingly silent on the matter other than a single reference to development opportunities being limited, with no specific justification.</p> <p>This approach is not justified given the services afforded to Pangbourne and the contribution it can make to housing delivery in this part of the District. Pangbourne has seen very limited housing growth in the last 2 plan periods, resulting in a lack of affordable housing in an area that remains unaffordable and where younger people struggle to get onto the property ladder. This</p>	<p>Comments noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p> <p>The Eastern Area is very constrained, with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston. Sites promoted have been assessed through the HELAA and site selection process. The Tilehurst Neighbourhood Development Plan Steering Group have responded to the consultation and stated that</p>



Respondent (with lpr ref)	Response	Council Response
	<p>should be a consideration in identifying new sites for housing in and around the village.</p> <p>Pangbourne College's land holding stretches to 93ha, although only a small proportion of that supports the built development comprising the College's buildings (teaching, residential and ancillary) and the Falkland Islands Memorial Chapel.</p> <p>The College, whilst very successful, has an ageing property portfolio and there is a pressing short, medium and long term need for replacement buildings on the site to meet current and future educational needs. The College makes a substantial economic contribution to the local area, both in relation to jobs and in inward investment and spend from families and staff using the local shops, restaurants and hotels. This contribution should be recognised and consideration should be given to identifying the built up area of the estate as a development area within the AONB, where educational development will be considered acceptable in principle. This would not preclude the consideration of individual development proposals from the appropriate scrutiny in design and impact terms but would give the College assurance that there is support for the College and its aspirations to improve the education offer.</p>	<p>they do not now intend to allocate sites for development. Further consideration as to how the policy refers to Neighbourhood Plans has been given and the policy will be amended as follows:</p> <p>'Additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in <u>some</u> Neighbourhood Plans.....</p> <p><b>Newbury and Thatcham</b> ..... <del>New allocations for housing for Cold Ash will be made through a NDP. ....</del></p> <p><b>Eastern Area</b> .... <del>New allocations for housing for Tilehurst and Burghfield will be made through NDPs. ....</del></p> <p><b>North Wessex Downs AONB</b> .... <del>Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through NDPs.'</del></p>
Turley for Richborough Estates Ltd (lpr2382)	<p><i>Part of full Representation promoting allocation of land north of Silchester Road, Tadley under Policy SP14.</i></p> <p>Richborough Estates Ltd broadly supports Policy SP1 with regards to the Spatial Strategy.</p> <p>However, it is considered that this policy should also facilitate development at adjoining existing settlements such as Tadley.</p> <p>It is apparent that Tadley has historically been overlooked as a growth location, given constraints relating to the DEPZ and that it is not within West Berkshire's administrative boundary. Sustainable development is not about lines on a plan and does not distinguish between local authority areas. Therefore West Berkshire cannot turn its back on a sustainable location like</p>	<p>Comments noted. No changes to the policy are required in light of this representation. Support for the policy is noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Tadley. In terms of the DEPZ, it is considered that this matter can be satisfactorily addressed and therefore this location should be considered as a suitable and sustainable location for growth. Therefore an additional line under the 'Eastern Area' subsection should be included to this effect. Suggested wording includes: <i>'Development adjoining Tadley will be facilitated by the Council subject to matters relating to the DEPZ being satisfactorily addressed'</i>.</p> <p>Changes sought: Suggested wording includes: <i>'Development adjoining Tadley will be facilitated by the Council subject to matters relating to the DEPZ being satisfactorily addressed'</i>.</p>	<p>settlement at the same level in the hierarchy will have different opportunities and constraints.</p> <p>The process of selection of sites for allocation will be outlined in the Site Selection background paper which will accompany the Regulation19 consultation.</p>
Wey Planning Ltd for Neville Baker Estate (lpr1272)	<p>We consider that the Spatial Strategy set out in Policy SP1 and elaborated upon by Policies SP2 to SP19 is not justified, effective or consistent with national policy. The main reasons are as follows:</p> <p>1.The Spatial Strategy does not strike an appropriate, equitable and sustainable balance between urban and rural development, resulting in an unacceptably high and increasing level of unmet housing need in the North Wessex Downs AONB, especially the need for affordable housing. In turn, failure to provide for an appropriate level of housing at the point of need will not provide adequate support for the local economy, services and facilities and will not help to maintain vibrant and balanced communities. Therefore, the Spatial Strategy will not deliver sustainable development in accordance with the policies of the NPPF. (See comments on Policies SP2 and SP15 for more detail).</p> <p>2. The increased urban emphasis of the Spatial Strategy which results in the unacceptable outcomes identified above is not justified ie. it is not an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence. The Council seeks to justify the strategy on the basis of the "special characteristics" of the AONB (Paragraph 6.23 of the WBLPR) but has not undertaken any further landscape assessment of the potential of available sites within the AONB to establish whether a higher level of housing provision can be accommodated without causing harm to these special characteristics. In accordance with Paragraph 172 of the NPPF, it is considered that such evidence is necessary and proportionate. (See comments on Policy SP2, SP3 and SP15 for more detail).</p>	<p>Comments noted.</p> <p>Potential opportunities for development across the district have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p> <p>Comments regarding development in the AONB are noted. However, the conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals in the AONB.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>3. The focus of development on the Newbury/Thatcham urban area is excessive and, as a result, the Spatial Strategy places undue reliance upon the strategic site allocations at Sandleford and North East Thatcham to deliver new housing, which has considerable potential to undermine the Council's ability to meet the housing needs of the area and maintain a 5 year housing land supply over the plan period. Given the very real concerns which exist in relation to the deliverability (availability, suitability and achievability) of both sites, it is considered that this high level of dependency is not justified. (See comments on Policies SP16 and SP17 for more detail).</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP2 North Wessex Downs AONB

### (Proposed Submission LPR Policy: SP2 North Wessex Downs AONB)

Number of responses received: 39

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr728)	Would prefer this sentence: The conservation and enhancement of the beauty of the landscape will be the primary consideration in the assessment of all development proposals.	Comments noted. Paragraph 4.23 of the Emerging Draft LPR sets out that the conservation and enhancement of 'natural' beauty is the primary purpose of AONB designation as set out in the Countryside and Rights of Way Act 2000.
<b>Statutory consultees</b>		
Chieveley Parish Council (lp1719)	Chieveley Parish Council welcomes the continued support for policies protecting the North Wessex Downs AONB. We think that development that does take place should be that which is required to support local environmental, economic and social benefits and must avoid significant harm to the landscape. Major development in the AONB should be refused except in exceptional circumstances. Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection. The application of these principles and relevant policy in the NPPF must be adequately reflected in the relevant policies of the Local Plan. Policy SP2 and the supporting text appears to achieve that.	Comments noted

Respondent (with lpr ref)	Response	Council Response
Cold Ash Parish Council (lpr1730)	<p>The rules and regulations around development of an AONB are to be applauded and West Berkshire District Council's embracing of them is important. However, such high values need to be put in context of the overall picture of West Berkshire. As highlighted in the report, 74% of West Berkshire is covered by the North Wessex Downs AONB. Embracing AONB regulations to their fullest means West Berkshire District Council is accepting of the increased impact of development in the non- AONB areas of the district, which is further exacerbated when taking into account the wider restrictions relating to AWE and flood zones. This just leaves 12% of the District available for development.</p> <p>So, rigorous application of AONB rules is only feasible if it is balanced with allowance in the housing targets set by central government. In the situation where this isn't the case, it places an undue burden on the non-AONB areas, in terms of the amount of development they are expected to absorb. This in turn would result in a polarisation of the district into heavily urbanised areas, with little green space, and significant swathes of rural land, with little development. This polarisation cannot be good for the district, as it is likely to result in a higher incidence of mental health issues among the population that is forced into living in very urbanised areas, which will be at odds with those who are fortunate enough to live in the rural areas. Indeed, the proposals defend the aims in relation to Landscape Character and Distinctiveness of locations in relations to AONB, but at the expense of all of the other areas within the district.</p> <p>What the district needs is a more balanced approach to development, with more green space retained in urban areas, more sensitive and landscape appropriate development in the rural areas and a gentle flow from urban to rural environments, thus providing a natural continuum.</p> <p>The stark difference proposed, between the treatment of AONB and urban areas could also lead to an "us and them" mentality, which cannot be helpful for the district as a whole.</p>	<p>Comments noted.</p> <p>SP2 is a strategic policy which sets out the Council's overall planning policy approach to the AONB. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR. This is set out in para 1.7 of the Emerging Draft LPR. There are other policies for instance which explain in more detail the Council's approach to the distribution of housing, green infrastructure, economic development and the response to climate change.</p>
Hungerford Town Council (lpr124)	We welcome the policy to conserve and enhance the AONB special landscape qualities.	Comments noted

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2271)	<p>This section is headed “Our Place Based Approach” but goes on to refer to “landscape led” planning. The two phrases are not the same, but “place” is much more than landscape.</p> <p>“Place” implies the entire perceived human geography: social, economic, and environmental. The AONB is more than mere landscape and the landscape we inherit is the result of centuries of stewardship by local people, who need to live and work in it as a community. We feel that much of the North Wessex Downs has become exclusive to people who live in it but do not work it or particularly wish to share it – even with Nature. Much of it is a prairie, barren of wildlife. It is not a place that future generations living working or visiting from the rest of the District and beyond will enjoy unless we plan differently.</p> <p>If the people of Newbury, Thatcham, and the outer suburbs of Reading – residents of West Berkshire – are to be expected to continue helping to pay to conserve and enhance the AONB then the Local Plan must accommodate more housing for its villages to remain or become viable, through tourism and new rural businesses offering employment within active travel distance wherever possible.</p> <p>We welcome the initiative of some villages in the AONB to prepare their own Neighbourhood Plans, noting that this will have to involve community led planning for more homes than are set out in this Local Plan. We trust this will enable some of the pressure on countryside surrounding our towns to be relieved. We do not see that all land outside settlements in the AONB needs protecting from development, even if it isn’t entirely ‘landscape led’.</p> <p>Development should always be sustainable but the social and economic aspects of tackling climate change can and should go alongside the environmental – which is about much more than preserving landscape as it is now.</p> <p>The conservation of the natural beauty of the landscape should not be the only “primary consideration” in assessment of development proposals in the AONB. The need to combat climate change is just as important in the AONB as anywhere outside it and there may be development proposed that helps tackle climate change but which it could be argued does not enhance the landscape.</p>	<p>Comments noted.</p> <p>SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR. This is set out in para 1.7 of the Emerging Draft LPR. There are other policies for instance which explain in more detail the Council’s approach to the distribution of housing, green infrastructure, economic development and the response to climate change.</p> <p>The Council’s approach to residential development in the countryside will be set out in Policy DM1 of the Proposed Submission LPR. This applies across the whole of the District.</p> <p>Paragraph 4.23 of the Emerging Draft LPR sets out that the conservation and enhancement of natural beauty is the primary purpose of AONB designation as set out in the Countryside and Rights of Way Act 2000.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>Climate change will, if unchecked, affect the landscape of the AONB and the nature of rural life more generally and permanently than even quite major forms of development.</i> Therefore, it is of no less importance to use development proposals that come forward there as a means of tackling climate change than it is elsewhere.</p> <ul style="list-style-type: none"> <li>The last sentence of the first paragraph in the policy should be amended thus: “The conservation and enhancement of the natural beauty of the landscape will be a prime consideration in the assessment of all development proposals, alongside the contribution made to tackling climate change.”</li> </ul> <p>The second sentence in the next paragraph should be amended thus: “Planning permission will be refused for major development in the AONB except in exceptional circumstances, and/or where it can be demonstrated to be in the long- term public interest.”</p>	
Shaw cum Donnington Parish Council (lpr196)	Supports the policy	Comments noted
Thatcham Town Council (lpr1389)	<ul style="list-style-type: none"> <li>"The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved."</li> </ul> <p>It is very unclear as to why maintaining remoteness should be an objective for West Berkshire Council regards AONB. The value of 'remoteness' which, amongst other metrics, is used to protect AONB land from development benefits, by definition, few people. However, the loss of accessible countryside and right-of-way access that is used by thousands has a much more profound effect on the residents of West Berkshire.</p> <p>It is necessary that greater weight is given to the health and well-being of the majority, versus the relative benefit obtained by a much smaller proportion of people who cherish remoteness.</p> <ul style="list-style-type: none"> <li>"The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals."</li> </ul> <p>We note that the North Wessex Downs AONB Board has objected to the development of all sites that make up NE Thatcham through the HELAA process. We fail to understand why the accessible, natural beauty of</p>	<p>Comments noted. The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland are some of the defining and special landscape qualities of the North Wessex Downs AONB. As a nationally designed landscape the policy is therefore clear that that the AONB will have appropriate and sustainable growth over the plan period which conserves and enhances these qualities.</p> <p>The NPPF para 80 also notes: <i>'Planning policies and decisions should also ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: ...limit the impact of light pollution from artificial light on ... intrinsically dark landscapes ...'</i></p>

Respondent (with lpr ref)	Response	Council Response
	<p>landscape to the North of Thatcham, should be valued any less than land designated as AONB elsewhere.</p> <p>It is necessary that equal weight is given to the assessment for NE Thatcham.</p> <ul style="list-style-type: none"> <li>• "Planning permission will be refused for major development in the AONB except in exceptional circumstances."</li> </ul> <p>We believe that this statement is inappropriate and constrains West Berkshire housing supply unnecessarily.</p> <ul style="list-style-type: none"> <li>• " It encompasses everything that makes the area distinctive: the area's geology and landform; its climate, soils and rivers; its wildlife and ecology; its rich history of human settlement and land use over millennia; its archaeology and buildings and cultural associations;"</li> </ul> <p>We note that NE Thatcham has previously been described by West Berkshire Council as "historic farmstead, proximity of woodland, and visibility across the valley. Proposals to reinforce the landscaping would only serve to partially conceal the housing and would take an extended period to become effective".</p> <p>There is a conflict between the selection of NE Thatcham and the policy SP 2 which is necessary to resolve.</p>	<p>The NPPF is clear that the scale and extent of development in AONBs should be limited and that planning permission for major development should be refused except in exceptional circumstances.</p> <p>Other issues are considered as part of Council response to issues raised under Policy SP17.</p>
South Oxfordshire District Council (lpr1781)	We are supportive of Policy SP2 as drafted and are pleased to see that it is consistent with the spatial context and strategic objectives set out in the North Wessex Downs AONB Management Plan 2019-2024.	Comments noted
Vale of White Horse District Council (lpr1776)	As the North Wessex Downs AONB stretches across the southern part of our own district, we are supportive of Policy SP2 as drafted and are pleased to see that it is consistent with the spatial context and strategic objectives set out in the North Wessex Downs AONB Management Plan 2019-2024.	Comments noted
Natural England (lpr1593)	We are supportive of the wording and content of this policy, and of its visibility at the beginning of the policies list. This is appropriate due to the importance of the AONB landscape within West Berkshire. The policy sets out and justifies what constitutes major development, which is in line with para. 172 of the NPPF. We are supportive of this approach and are satisfied that this policy will work to safeguard the North Wessex Downs AONB.	Comments noted



Respondent (with lpr ref)	Response	Council Response
<b>General consultation bodies</b>		
North Wessex Downs AONB (lpr1622)	<p>Encouraging and delighted to see a standalone AONB policy and for it to be high up the list of policies.</p> <p>The overall plan demonstrates a landscape led approach which is refreshing and welcoming. The Plan clearly outlines the current allocation of up to 2000 dwellings to 2026 as a ceiling figure and subsequent development after which is to be encouraged via NDPs.</p> <p>Policy SP2 is clear in providing residents/developers with a set criteria on which development will be assessed including context and cumulative impact, the AONB is highly sensitive and development that is deemed acceptable in one locality may be deemed unacceptable in another due to the context and character of the site and surrounding landscape, it is therefore important that a robust and clear policy is set which we believe WB has achieved. It follows the NPPF in not setting a definition of major development which we endorse as major development cannot be easily defined particularly in such a varied landscape as the North Wessex Downs.</p> <p>We welcome the background work of the policy within the informative text and the flexibility given within the definition of major development, as worded it ensures that not only naturally large applications but smaller/minor developments can be determined as major, for example a development of 5 houses, due to the landscapes sensitivity to change could have the same or greater impact than a development for 20 houses elsewhere in the AONB. A locations landscape character and sensitivity to change needs to be a factor in defining major development and this is demonstrated within Policy SP2.</p> <p>Setting has been included in the wording of the policy which we welcome as demonstrated in the changes to the NPPG, the same weight should be given to land within the setting of the AONB as is within.</p> <p>The policy also includes special qualities of the AONB including dark skies which we fully endorse.</p>	Comments noted
West Berkshire Green Party (lpr1825)	We broadly support this policy.	Comments noted

Respondent (with lpr ref)	Response	Council Response
West Berkshire Green Exchange (lpr1550)	<p>The analysis of the special areas shows that 70% of the available area is AONB. This is a problem, as the rest of the document shows, because it means that only a small percentage of the area is available for development of a large block of houses. Even this area is further constrained by the proximity to Burghfield and Aldermaston nuclear installations.</p> <p>Yet the document shows no appetite for challenging the constraints imposed in the AONB. Its villages are dying: many have lost their village post office, village shop even their pub. Many too can expect their churches to become de-consecrated and abandoned in the near future. They are inaccessible except by car, as local bus services have been axed. Their houses are not affordable by many young people, forcing them to move away. The inability of generations to remain in one location creates a loss of continuity and of history.</p> <p>A solution to the problems of the villages in the AONB is to build more houses there, including a proportion of affordable homes, so that the larger local economies can once again support the local services that are required. The required number could be built without damaging the character of the AONB and could even enhance it. The document should address this. Policy SP2 makes no mention of these problems. In particular the limit of 2,000 homes shown in para 4.16 should be challenged.</p> <p>Furthermore, the AONB should not just be a “pretty place” but should play its part in tackling the climate change emergency. Much more emphasis should be given to encouraging the use of solar power and wind turbines within the AONB. After all, these technologies can be rapidly deployed and, when no longer required, dismantled.</p>	Comments noted. SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR. This is set out in para 1.7 of the Emerging Draft LPR. There are other policies for instance which explain in more detail the Council’s approach to the distribution of housing, economic development and the response to climate change.
West Berkshire Heritage Forum (lpr69)	Support. The archaeological potential of the AONB should be a significant factor in considering any development. It should be mentioned in the policy itself, not just the supporting text.	Comments noted. SP2 is a strategic policy covering a wide range of issues which are not specifically highlighted. The supporting text is able to go into more detail.
<b>Other stakeholders</b>		
David Copas (lpr1432)	<p>[part of wider response to SP17]</p> <p>The spatial strategy SP1 and SP2 and supporting text are important. SP2 states the proposed arrangement if an application is deemed to be major development with proximity to the AONB and aspects that further</p>	Comments considered as part of Council response to lpr1305 under Policy SP17

Respondent (with lpr ref)	Response	Council Response
	<p>consideration will take account. However the consultation on the Local Plan Review and a simultaneous consultation of a detailed growth study, which is clearly a major development, is a seriously flawed procedure. This is confusing to local people who want to express their views, gives the clear message that the parameters in the plan are already fixed and therefore one or other consultation has a predetermined outcome. In addition the time table for two such large consultations is unfair.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP.</li> </ul> <p><b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b></p>	
Sam Coppinger (lpr283)	Supports the policy	Comments noted
Tim Hall (lpr639)	Supports the policy	Comments noted
David Hill (lpr696)	<p>The protection at virtually any cost of the character of the AONB is to freeze rural areas in a time-warp and prevents progression of communities and housing provision.</p> <p>A priority should be the protection of the environment of the AONB, over and above the character.</p> <p>Development has historically been of its age and best using materials and techniques of its time, which has developed over many generations. Preservation of what often are deemed to be inefficient techniques and materials is contradictory to the need to improve the environment. Excellent contemporary design can be sensitive to the environment and to the character of the area and should be allowed to evolve.</p> <p>Development should be permitted according to the needs and interests of the local communities.</p>	<p>Comments noted. The Council does not agree that the policy freezes rural areas in a time warp and does not allow landscapes to evolve. The policy is clear that the AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities. It also makes clear that development should respond positively to the local context, conserving and enhancing local distinctiveness and sense of place. It also makes clear that future development will support its local communities and the rural economy.</p> <p>SP2 is a strategic policy which sets out the Council's overall planning policy approach to the AONB. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR. Policies SP5 and SP7 explain in more detail the Council's approach to</p>

Respondent (with lpr ref)	Response	Council Response
	Good quality and environmentally sensitive designs should be supported without needing to blend in with older properties. Landscapes should be allowed to evolve.	responding to climate change and design quality respectively.
Councillor Alan Law (lpr1078)	<p><b>Major/ minor developments in AONB: Policy SP2.</b> I welcome and support the statement in 4.26 (1st bullet) which will use the National standard definition of Major / minor development (Major equates to 10 dwellings or above) contained in the Town &amp; Country Planning order 2015 as the starting point and that only proposals of a National significance will be an exception to this definition of "major". This should help reinforce the requirements for developments within the AONB to be more restrictive and controlled as per the general intention of the NPPF and other local policies.</p> <p>I also welcome the flexibility (2nd bullet Para 4.26) which affords some flexibility for proposed sites below the 10 dwelling minor limit. This is especially important on sites adjacent to or close to small, landscape sensitive villages, such as Streatley where even a 9 house development may constitute major development in the context of the village and its setting.</p>	Comments noted
Councillor Alan Macro (lpr752)	<p>The statement “planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest” is too restrictive.</p> <p>Restricting development to this extent would increase pressures for development elsewhere in the district. It would also allow villages to “wither on the vine” because their population would age and thus reduce the viability of services such as shops, pubs, primary schools and churches.</p> <p>Major developments SHOULD be allowed in the AONB where they do not have a significantly adverse effect on landscape character.</p>	Comments noted. The Council’s approach to major development is in accordance with national planning policy set out in the NPPF.
Ian Parsons (lpr827)	<p>A policy refusal for development on a large scale is to be welcomed. We hope to see an enhanced value given to the views of parish councils and local residents with regard to smaller development proposals.</p> <p>"The <b>need</b> for development in the location proposed" must be clearly signposted as a central feature in any application.</p>	Comments noted

Respondent (with lpr ref)	Response	Council Response
Debbie Reynolds (lpr1310 and lpr2467)	<p>[NB. The response is recorded all together under lpr1305 for SP17 NE Thatcham, and separately in lpr 1306,1307,1308 and 1309. It keeps the original numbering of the recommendations.]</p> <p><b>Chapter 4 Development strategy – our place based approach</b></p> <p>The spatial strategy SP1 and SP2 and supporting text are important. SP2 states the proposed arrangement if an application is deemed to be major development with proximity to the AONB and aspects that further consideration will take account. However the consultation on the Local Plan Review and a simultaneous consultation of a detailed growth study, which is clearly a major development, is a seriously flawed procedure. This is confusing to local people who want to express their views, gives the clear message that the parameters in the plan are already fixed and therefore one or other consultation has a predetermined outcome. In addition the time table for two such large consultations is unfair.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP.</li> </ul> <p><b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP.</p>	Comments considered as part of Council response to lpr1305 under Policy SP17
Paula Saunderson (lpr953)	You will continue to create Dormy Villages for the affluent, typically allowing smaller dwellings with reasonable plots to be bought up and expanded and gardens destroyed. Social Housing will continue to decline in these villages, forcing the children of less affluent families into urban dwelling life to the detriment of their Health & Being Well.	Comments noted. SP2 is a strategic policy which sets out the Council's overall planning policy approach to the AONB. The policy is clear that the AONB will have appropriate and sustainable growth over the plan period. The policy has to be set within a national planning policy context and be read alongside all the other policies in the LPR. There are other policies for instance which explain in more detail the Council's approach to the provision of

Respondent (with lpr ref)	Response	Council Response
		affordable housing, health and wellbeing, house extensions, replacement dwellings, extension of residential curtilages in the countryside etc.
Councillor Tony Vickers (lpr527)	<p>The conservation of the natural beauty of the landscape should not be the only “primary consideration” in assessment of development proposals in the AONB. The need to combat climate change is just as important in the AONB as anywhere outside it and there may be development proposed that helps tackle climate change but which it could be argued does not enhance the landscape.</p> <p><b><i>Climate change will, if unchecked, affect the landscape of the AONB and the nature of rural life more generally and permanently far more than even quite major forms of development.</i></b> Therefore it is of no less importance to use development proposals that come forward there as a means of tackling climate change than it is elsewhere.</p> <p>The statement “planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest” is too restrictive.</p> <p>Restricting development to this extent would increase pressures for development elsewhere in the district. It would also allow villages to “wither on the vine” because their population would age and thus reduce the viability of services such as shops, pubs, primary schools and churches.</p> <p>Major developments SHOULD be allowed in the AONB where they do not have a significantly adverse effect on landscape character. They can still be “appropriate and sustainable” - perhaps far more so than a large addition to Thatcham or Newbury.</p> <p>The last sentence of the first paragraph in the policy should be amended thus:</p> <p>“The conservation and enhancement of the natural beauty of the landscape will be a <b>prime</b> consideration in the assessment of all development proposals, <b>alongside the contribution made to tackling climate change.</b>”</p> <p>The second sentence in the next paragraph should be amended thus:</p> <p>“Planning permission will be refused for major development in the AONB except in exceptional circumstances, and/or where it can be demonstrated to be in the <b>long term</b> public interest.”</p>	<p>Comments noted. SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. The policy has to be set within a national planning policy context and be read alongside all the other policies in the LPR. This requirement is set out in para 1.7 of the Emerging Draft LPR – ‘It is important that the LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. Please note that the policies in the LPR do not list or cross-refer to all other policies that may be relevant.’</p> <p>Policy SP5 sets out how the LPR is responding to climate change.</p> <p>The Council's approach to major development is in accordance with national planning policy set out in the NPPF.</p>

Respondent (with lpr ref)	Response	Council Response
Toby & Gail Woodhouse (lpr2020)	<p>(Extracted from main representation to SP17 Thatcham) AONB SP1 &amp; SP 2) – the proposed development abuts Bucklebury Common and the North Wessex Downs AONB. Residents of the proposed new developments will be drawn to the Common and will significantly increase the pressures already evident on the delicate eco systems and existing wildlife. Parking on and around the Common is already exceeding capacity, with verges being used during peak periods. Whilst the development is relatively close, not all residents will walk/cycle to the Common they are more likely to drive. The open spaces on the proposed developments will not be big enough or as appealing as the Common land within the AONB.</p>	Comments noted. The issues raised relate to Policy SP17 and will be dealt with under the Council's response to that policy.
<b>Landowners, site promoters and developers</b>		
Armstrong Rigg Planning for Manor Oak Homes (lpr2419)	<p>Full representation is promoting development of Land at Fairview, Greenways, Lambourn Supports the policy. The wording of Policy SP 2 is largely copied from NPPF paragraph 172 with respect to presumption against major development, the criteria for assessing whether a development constitutes major development and the criteria for assessing whether major development should be allowed in the public interest. As such, Manor Oak Homes broadly supports Policy SP 2. Manor Oak Homes also supports the statement that “<i>Development in the North Wessex Downs will support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape</i>”. This is an important recognition of the social and economic needs of the various communities within the AONB and dovetails with our suggested amendments to Policy SP 1 above.</p>	Comments noted
Barton Willmore for Donfield Homes (lpr2094)	The policy represents an unnecessary duplication of national planning policy. The majority of policy SP2 represents an unnecessary duplication of paragraphs 170-173 of the National Planning Policy Framework. This is inconsistent with Government direction set out in the White Paper: Planning for the Future (August 2020) which indicates an intention for local plans to be simplified and significantly shorter in length.	Comments noted. The North Wessex Downs AONB covers 74% of the District and the Council considers a specific policy is justified. It is notable that both Natural England and the North Wessex Downs AONB are both supportive of this approach.

Respondent (with lpr ref)	Response	Council Response
	The policy should be revised to remove duplication and refer to the relevant sections of national policy instead.	
Barton Willmore for Donnington Valley Group (lpr2432)	The majority of policy SP2 represents an unnecessary duplication of paragraphs 170-173 of the National Planning Policy Framework. This is inconsistent with Government direction set out in the White Paper: Planning for the Future (August 2020) which indicates an intention for local plans to be simplified and significantly shorter in length. The policy should be revised to remove duplication and refer to the relevant sections of national policy instead.	Comments noted. The North Wessex Downs AONB covers 74% of the District and the Council considers a specific policy is justified. It is notable that both Natural England and the North Wessex Downs AONB are both supportive of this approach.
Barton Willmore for Sulham Estate (lpr2437)	The majority of policy SP2 represents an unnecessary duplication of paragraphs 170-173 of the National Planning Policy Framework. This is inconsistent with Government direction set out in the White Paper: Planning for the Future (August 2020) which indicates an intention for local plans to be simplified and significantly shorter in length. The policy should be revised to remove duplication and refer to the relevant sections of national policy instead.	Comments noted. The North Wessex Downs AONB covers 74% of the District and the Council considers a specific policy is justified. It is notable that both Natural England and the North Wessex Downs AONB are both supportive of this approach.
Donnington New Homes (lpr2062)	Donnington New Homes are promoting land at Kiln Farm, west of B4009 and north of Hermitage Primary School and referenced within the HELAA as HER5. The site is approximately 5.8 Hectares (14.33 Acres) and based on the Concept Land Use Plan submitted with our call for sites submission package dated 29th September 2019, could accommodate approximately 110 dwellings. We welcome that the Policy states that the AONB will have “appropriate and sustainable growth” and that “Development ... will support its local communities and rural economy ...”. We are concerned that the second paragraph of the Policy goes on to state that “ <i>Planning permission will be refused for <u>major development</u> in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest</i> ” (my emphasis). The third paragraph of the Policy states that “ <i>in determining what constitutes major development the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This</i>	Comments noted.  Sites allocated as part of the plan making process, whether through the LPR or Neighbourhood Plan, will undergo a rigorous site assessment and sustainability appraisal. No changes to the policy are considered necessary.  The response relates to a specific site being promoted through the HELAA at Hermitage. The Council was informed in February 2022 that the Hermitage NDP will no longer be allocating housing sites and so the Council will be considering if there are appropriate opportunities for development as part of the LPR.



Respondent (with lpr ref)	Response	Council Response
	<p><i>will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development</i>".</p> <p>Policy SP1 states that allocations for housing will be made for Hermitage through a Neighbourhood Development Plan.</p> <p>Policy SP15 goes on to allocate sites for residential development in the North Wessex Downs AONB, to settlements that are not registered as Designated Neighbourhood Areas.</p> <p>A Neighbourhood Area for the Parish of Hermitage was designated on 26th April 2019. As a result, no sites are allocated for residential development at Hermitage in the LPR and instead, Policy SP15 directs 20 new dwellings to Hermitage through the Neighbourhood Development Plan.</p> <p>We <u>support</u> the decision to <i>identify</i> the need for 20 new dwellings at Hermitage, to be delivered through the Neighbourhood Plan process.</p> <p>In order to provide consistency with regards to development in the AONB through the Local Plan Review it's considered necessary for Policy SP2 to make it clear that the delivery of housing required through Neighbourhood Plans (as required by Policy SP15) would not constitute major development (in principle). As currently drafted the Policy leaves consideration as to what constitutes major development down to the decision maker (i.e. the LPA) at the time an application is made. It is therefore requested that the second paragraph of Policy SP2 is amended as follows:</p> <p><i><u>"Development in the North Wessex Downs AONB will support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. Sites will be brought forward for residential development through Policies in the Plan and through Neighbourhood Development Plans. Such sites will not be deemed to constitute major development in the AONB. Planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest"</u></i>. (proposed new text is underlined).</p> <p>The above suggested change to Policy SP2 would ensure Policy SP15 is consistent with the wider strategy of the Local Plan Review.</p> <p>We have taken the opportunity to prepare a revised concept plan, to deliver a scheme of a suitable form and scale that accords with the Hermitage NDP 20 dwelling requirement.</p>	

Respondent (with lpr ref)	Response	Council Response
	We have written to the Hermitage NDP group on this basis and we enclose the correspondence and enclosures. This information should be used for any future HELAA updates. Please note that the original site area submitted to West Berkshire Council 29th September 2019, referenced within the HELAA as HER5, remains valid for any future HELAA assessment.	
Fisher German LLP for Mr M and W Musgrave and Begley (lpr1227)	We support the recognition within Policy SP2 that development is needed within the AONB, to support the sustainable growth of existing communities. Without such delivery, rural settlements within the AONB will likely age and stagnate, with no affordable housing delivered forcing young people and families out of the area.	Comments noted
Nexus Planning for Pangbourne Beaver Properties Ltd (lpr1652)	<p>Policy SP1 The Spatial Strategy states, inter alia, that;  <i>“The North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities as set out in policy SP2.”</i></p> <p>We endorse this policy objective which is replicated in Policy SP2. However, as set out in our representations to Policy SP1 and SP15 the Council’s housing strategy for this spatial area, which fails to allocate any additional housing at Pangbourne despite the fact that it is one of the most sustainable settlements in the District, is unsound. We note that the whole of Pangbourne, including the village itself, is washed over by this designation. Like most of the sites that are allocated for development in the Plan the site is currently outside, but adjoins the settlement boundary</p> <p>To ensure that the Council’s spatial strategy is applied correctly, having regard to the objective to accommodate appropriate and sustainable growth within the North Wessex AONB spatial area as identified in Policies SP1 and SP2, Policy SP 15 must be amended to ensure that a site/sites at Pangbourne are identified for housing. For the reasons set out in our representations to Policy SP15, this should include the allocation of 35 – 40 dwellings at Site Ref: PAN8 (Pangbourne Hill).</p>	Comments noted. The issues raised will be considered under the Council’s response to Policy SP15
Pegasus for Donnington New Homes (lpr2216)	<p><i>(comments submitted under SP15 as well)</i></p> <p>Donnington New Homes are submitting a number of representations in relation to the consultation and this letter and representation relates</p>	<p>Comments noted.</p> <p>Sites allocated as part of the plan making process, whether through the LPR or Neighbourhood Plan, will undergo a</p>

Respondent (with lpr ref)	Response	Council Response
	<p>specifically to their land interests in Hungerford, namely sites HUN7, HUN8, HUN9 and HUN10 as labelled in the Council's HELLA.</p> <p>Policy SP2 of the Emerging Draft Local Plan deals specifically with the North Wessex Downs AONB which washes over the town of Hungerford.</p> <p>It is welcomed that the Policy states that the AONB will have <i>“appropriate and sustainable growth”</i> and that <i>“Development ... will support its local communities and rural economy ....”</i>.</p> <p>Donnington New Homes are however concerned that the second paragraph of the Policy goes onto state that <i>“Planning permission will be refused for <u>major development</u> in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest”</i> (my emphasis). The third paragraph of the Policy states that <i>“in determining what constitutes major development the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development”</i>.</p> <p>Notwithstanding the above text within Policy SP2 Policy SP1 states that allocations for housing will be made for Hungerford through a Neighbourhood Development Plan.</p> <p>Hungerford is identified as a Rural Service Centre in Policy SP3.</p> <p>Policy SP15 allocates sites for residential development in the North Wessex Downs AONB at settlements that are not included within a Designated Neighbourhood Area. A Neighbourhood Area for the Parish of Hungerford was designated on 9th April 2018. No sites are therefore allocated for residential development in Hungerford in the Emerging Local Plan Review. Rather, Policy SP15 directs 55 new dwellings to Hungerford through the Neighbourhood Development Plan.</p> <p>Donnington New Homes welcomes the identification of a need for 55 new dwellings at Hungerford and for these to be delivered through the Neighbourhood Plan process. They are however concerned that Policy SP2 could be overly restrictive to the delivery of this requirement through its reference to <i>“planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest”</i>.</p>	<p>rigorous site assessment and sustainability appraisal. No changes to the policy are considered necessary.</p> <p>The response relates to a specific site being promoted through the HELAA at Hungerford. The issues raised will be considered under the Council's response to Policy SP15</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The NPPF defines major development generally as being development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more (NPPF Glossary) except for the purposes of paragraph 172 and 173 of the NPPF which deal with AONBs where the definition of ‘major development’ is stated as being a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p> <p>An appeal decision (PINS ref: APP/F160/W/16/3165805) dated November 2017 for 30 dwellings in the Cotswold AONB in Chipping Camden (Cotswold District Council) considered what constitutes major development in the AONB. A copy of the decision is enclosed with this letter.</p> <p>The Inspector confirmed it was common ground that there is no definition of what constitutes “major development” (paragraph 13). He continued to acknowledge that <i>“the proposal, for 30 dwellings, using the normal meaning of the word ‘major’ is capable of amounting to major development, depending on context ... (however) ... the scale of the proposal in relation to the size of the settlement would not be major, amounting to about 2.5% of the size of the town”</i> (paragraph 13).</p> <p>At the 2011 Census the Parish of Hungerford was recorded as containing 2,756 households. The proposed Neighbourhood Plan allocation of 55 dwellings would therefore amount to about 1.99% of the size of the town. Furthermore, HUN7 which is being promoted by Donnington New Homes could deliver circa 31 dwellings and would therefore be consistent in scale with the development referred to in the above appeal decision which was found not to constitute major development in the Green Belt. Should HUN7 come forward for development it would also allow a further smaller site to come forward for residential development in Hungerford (i.e. such as HUN9).</p> <p>In order to provide consistency with regards to development in the AONB through the Local Plan Review it is considered necessary for Policy SP2 to make it clear that the delivery of housing required through Neighbourhood Plans (as required by Policy SP15) would not constitute major development (in principle). As currently drafted the Policy leaves consideration as to what constitutes major development down to the decision maker (i.e. the LPA) at</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>the time an application is made. It is therefore requested that the second paragraph of Policy SP2 is amended as follows:  <i>“Development in the North Wessex Downs AONB will support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. <u>Sites will be brought forward for residential development through Policies in the Plan and through Neighbourhood Development Plans. Such sites will not be deemed to constitute major development in the AONB.</u></i></p> <p>The above suggested change to Policy SP2 would ensure Policy SP15 is consistent with the wider strategy of the Local Plan Review.</p>	
Pro Vision for Cala Group Ltd (lpr2413)	<p><i>In context of two sites: East and West of Salisbury Road, Hungerford.</i></p> <p>Draft Policy SP2 (AONB) is supported in that it is consistent with the National Planning Policy Framework (NPPF) in recognising that a planning judgement is needed over individual proposals for development in the designated landscape as to whether it constitutes “major development” and therefore if “exceptional circumstances” are needed to allow the development (NPPF 172).</p> <p>The wording of policy duplicates NPPF 172 (parts a, b and c). A cross reference to NPPF 172 would be appropriate.</p> <p>The wording of draft Policy SP2 would also be more consistent with the NPPF if it explained that “great weight” should be given to the Authority’s duty to conserve and enhance the AONB.</p> <p>Great weight is rightly mentioned (consistent with the NPPF) in regard to heritage assets, but not, as drafted, in respect of landscape. This is an important term, confirming that the decision maker has to make a judgement about the impact on designated landscape as part of a balance of planning considerations.</p> <p>Therefore, by definition, there may be occasions where major development is acceptable in such areas, in which case, mitigation of any harm identified becomes paramount.</p> <p>Opportunity for development outside the AONB is limited, noting that 74% of the district has this designation (i.e. only a quarter of the district is outside).</p> <p>Sustainability Appraisal - Draft Policy SP2 is assessed as performing very positively against SA1. That would imply that the spatial policy for the AONB</p>	<p>Comments noted. The primary purpose of AONB designation, ‘to conserve and enhance the natural beauty of the area’, is set out in the Countryside and Rights of Way Act 2000. Under Section 85 of the Act, the Council has a duty to have regard to the primary purpose of designation and so this policy makes clear that the North Wessex Downs will have appropriate sustainable growth throughout the plan period to support its local communities and rural economy in a manner commensurate with its statutory status. The policy makes clear that the <i>‘conservation and enhancement of the natural beauty of the landscape will be the <b>primary</b> consideration in the assessment of all development proposals.’</i></p> <p>Comments in relation to the Sustainability Appraisal will be considered as part of the Council’s response to that document.</p> <p>SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. This has to be read alongside all the other policies in the LPR. This is set out in para 1.7 of the Emerging Draft LPR. These polices include SP7 Design Quality and SP8 Landscape Character. The proposed additional wording is therefore not considered necessary.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>would perform well against meeting affordable housing needs.</p> <p>As discussed in previous sections, the proposed policy approach to the AONB is protective and quite clearly is not designed to meet anywhere near the identified need (in the UHNE).</p> <p>Looking at Appendix 4 of the SA, with the detailed policy assessments, the policy is assessed as follows: “significantly positive contribution makes towards the provision of housing”.</p> <p>While we do not disagree with the SA that having no policy for the AONB area would not be appropriate, it should be recognised that the proposed policy approach to the AONB is one of constraint to housing delivery such that needs will not be met. The plan maker has to balance that negative against the positives, for example, potentially protecting the designated landscape from significant development over the plan period.</p> <p>A very positive assessment or score is therefore illogical and misleading against this objective. While the policy may well score highly in other respects, it does not in terms of SA1, and so the assessment should be thoroughly reviewed in this respect if it is to stand-up to scrutiny.</p> <p>The SA may even underplay how draft Policy SP2 and SP15 actually positively help to protect the AONB from development (for example, when assessed against SA5 – Natural, built and historic environment), again indicating a review of the assessment would be appropriate.</p> <p>We propose that the wording of draft Policy SP2 is amended in respect of its final sentence (proposed new words in bold italics): If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities of the AONB will be sought. <b>This should include effective mitigation of the impacts of development, for example, careful location, design of new buildings and high quality landscaping schemes.</b></p>	
Rural Solutions for Karine Giannamore (lpr2309)	<p>This focuses on the ‘major development’ test based primarily on it’s ‘context’, scale and nature of the development in which the application is being considered. Perhaps this wider ‘context’ should be emphasised more, in light of the interdependencies often hamlets and village clusters often play. Again, this area is a working landscape, so supporting local businesses within the protected landscape and the important role they play should be</p>	<p>Comments noted. SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. The policy is clear that the AONB will have appropriate and sustainable growth over the plan period. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>highlighted. “Development in the North Wessex Downs will support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape’ should be reconsidered. This social economic duty and well-being of communities is crucial. It can be achieved without detriment to the landscape and have ecological net gains in the long-term.</p> <p>The supporting text is very negatively worded, ‘Detrimental Effects’ is cited many times. There is always a balance in assessing and identifying any perceived ‘harm’.</p>	
Savills for Englefield Estate (lpr1525)	<p>Draft LPR Policies SP1 and SP2 propose to continue the Core Strategy approach of allowing ‘appropriate and sustainable growth’ in the AONB, with provision made for 100 dwellings through NDP allocations plus several other small sites (draft LPR Policy SP15). In light of the increasing housing needs in the district (explained further below) and the challenges of accommodating these needs, a greater allowance should be made for new development in the AONB, including at Englefield village and other windfall sites. A positive approach should be taken to considering development proposals which are commensurate in scale and extent in the AONB which reflects guidance set out in paragraphs 78 and 172 of the NPPF.</p>	<p>Comments noted. Policy SP3 sets out that the focus of development in the district will follow the settlement hierarchy which takes account of the function and sustainability of settlements and promotes sustainable communities.</p> <p>The NPPF is clear that the scale and extent of development in AONBs should be limited and that planning permission for major development should be refused except in exceptional circumstances.</p>
Savills for Newbury and District Agricultural Society (lpr2043)	<p><i>(Part of full response to Newbury Showground site)</i></p> <p>NADAS recognises the importance of the North Wessex Downs AONB and its special landscape qualities.</p> <p>However given that this designation covers nearly three-quarters of the district (74%), the Council will need to consider promoting sites for economic growth across the less sensitive parts of the AONB. The supporting landscape evidence acknowledges that there are local urban influences in the surrounding area – in the form of large commercial buildings and the adjacent road network, including the Junction 13 gyratory, the motorway service station and Vodafone HQ to the south of the M4 – which does not reflect the landscape character of the predominantly rural parts of the AONB. These findings were corroborated by Council officers during their consideration of a retrospective application for the erection of warehouse premises on Land at Priors Court Farm, north of Priors Court Road, in 2016 (app. ref. 11/01089/FUL). The Planning Officer’s delegated report</p>	<p>Comments noted. The Council’s strategic approach to employment land will be set out in Policy SP20 of the Proposed Submission LPR.</p> <p>Specific points relating to land at Newbury Showground will be considered as part of the Council’s response to Policy SP21.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>highlighted the “relatively eroded / degraded nature of this segment of the AONB in the vicinity of Hermitage given the impact of the M4 corridor, the junction 13 road corridor, and the Showground itself with the recently completed new Exhibition Hall” (paragraph 6.3.1).</p> <p>The supporting Landscape Planning and Design Strategy sets out a series of recommendations to avoid and mitigate adverse landscape and visual effects in relation to the site’s development. Consideration will be given to moderating potential effects on the landscape, in relation to the AONB designation. The strategy includes the need to prepare a Landscape and Visual Impact Assessment.</p>	
Southern Planning Practice for the Saunders family (lpr2116)	<p>We support Policy SP2 and its objective that the North Wessex Downs AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities and supports its local communities and rural economy.</p> <p>In determining what constitutes a major development we support and encourage the case by case approach. With regards to the land at Coombe Bottom Farm, we have assessed this against the criteria as to what constitutes a major development set out in policy SP2. The site would provide a sensitive landscape-led residential development which would not be of a scale, character of nature which would potentially have a significant impact on the landscape and scenic beauty of the AONB, as such it would not be a major development.</p> <p>The site provides a unique development opportunity in the AONB. The site is located immediately to the north west of the defined settlement boundary, and as set out later in these representations should be included within the revised settlement boundary, it is therefore very well related to the existing settlement. In addition, the site is both physically and visually well contained by Streatley Hill to the north, the area of woodland to the north west and west and residential development on the remaining boundaries. As set out in the Landscape and Visual Appraisal Report, through the implementations of landscape-led development parameters and mitigation measures, the site would not have an adverse visual impact on the surrounding AONB and as such, the Council should seriously look to allocate the site in the emerging Local Plan, or at the very least extend the settlement boundary to include the site to help facilitate its development.</p>	<p>Support for the policy noted.</p> <p>The response also relates to a specific site being promoted through the HELAA at Streatley. The issues raised will be considered under the Council’s response to Policy SP15.</p> <p>As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary.</p>



Respondent (with lpr ref)	Response	Council Response
Wey Planning Ltd for Neville Baker Estate (lpr1276)	<p>1. Policy SP2 states that the North Wessex Downs AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities. However, unlike the corresponding Policy ADPP5 in the West Berkshire Core Strategy DPD (the Core Strategy), which states that up to 2,000 new dwellings will be delivered in the AONB over the Core Strategy period, Policy SP2 gives no indication of the amount or scale of new housing provision in the AONB over the WBLPR plan period 2020 – 2037. This is a major shortcoming of PolicySP2 and should be corrected for (at least) the following reasons:</p> <p>a) It creates a high degree of uncertainty.</p> <p>b) Without such a figure, it is impossible to establish whether the stated policy objective of achieving appropriate and sustainable growth which conserves and enhances the special qualities of the AONB will be met. Put another way, the WBLPR is silent on the matter of how much new housing is considered to be appropriate and sustainable.</p> <p>c) Without such a figure, it is not possible to establish whether the Spatial Strategy of the WBLPR set out in Policy SP1 is justified ie. it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>d) Without such a figure, it is not possible to establish the extent to which the housing and other objectives of the WBLPR in respect of the AONB will be met.</p> <p>e) Similarly, without such a figure it is not possible to monitor performance in terms of housing delivery over the lifespan of the Plan against the housing and other objectives of the WBLPR in respect of the AONB.</p> <p>In short, the absence of an overall housing requirement or target (expressed as a maximum) for the AONB makes the WBLPR unsound and this should be corrected.</p> <p>2. Notwithstanding the absence of an overall housing requirement for the AONB in Policy SP2, it is clear from Paragraphs 4.16 and 6.23 of the supporting text and Paragraphs 4.4 and 4.6 of the Interim Sustainability Appraisal Report that:</p> <p>a) The Council considers that existing housing allocations in the AONB identified in the Housing Site Allocations DPD that are still to be delivered by</p>	<p>Comments noted.</p> <p>The policy does not set out a housing figure for the AONB. The Council's overall approach to identifying land for allocation is set out in Policy SP1: Spatial Strategy and in Policy SP3: The Settlement Hierarchy. Sites proposed for allocation are detailed in Policies SP13 to 15. The Council will also prepare a Housing Background Paper to be published alongside the Proposed Submission LPR. The issues raised are more appropriately considered as part of the Council's response to Policies SP1 and SP15.</p> <p>The Landscape Sensitivity and Capacity Assessments that have been undertaken on sites in the AONB are published on the Council's website. In Designated Neighbourhood Areas where NDPs are allocating sites, then assessment would be undertaken as part of the NDP process.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2026 will largely meet the housing needs of the AONB to 2037, so additional allocations for the period 2026-2037 need only be limited.</p> <p>b) Development in the AONB over the period 2020-2037 will be modest, helping to meet local needs.</p> <p>c) The WBLPR Spatial Strategy proposes to focus a higher proportion of development within the Newbury and Thatcham urban area than in the Core Strategy, with limited additional growth in the AONB.</p> <p>d) The Council considers that a Spatial Strategy of maximising the provision of new housing in the most sustainable locations should ensure an equitable distribution of housing, including housing for different sectors of the community. (Our underlining)</p> <p>3. The Council provides no evidence to justify the above statements. However, they all clearly indicate that the amount of new housing development in the AONB over the WBLPR plan period will be a reduction on the current planned levels of housing provision in the Core Strategy in absolute terms and relative to the rest of the District. In this regard, it should also be noted that the amount of new housing provided for by Policy ADPP5 of the Core Strategy (up to 2,000 new dwellings over the period 2006 – 2026) is itself a shortfall compared against local housing need in the AONB and so a further reduction in the amount of new housing provision proposed will mean that the level of unmet housing need in the AONB will rise progressively over the WBLPR plan period.</p> <p>4. The unacceptable consequences of a high and increasing level of unmet housing need in the AONB in terms of meeting the housing and other objectives of the WBLPR in relation to the AONB are set out in our comments on Policies SP1 and SP15.</p> <p>5. As Paragraph 4.4 of the Interim Sustainability Appraisal Report confirms, the proposed reduction in the level of new housing provision in the AONB is the result of a Spatial Strategy which focuses a higher proportion of development within the Newbury/Thatcham urban area. Compared with the Spatial Strategy of the CS, this represents a shift in the broad distribution of new housing development towards urban areas and away from rural areas, including the AONB. In this regard, Paragraph 63 of the CS Inspectors Report notes that the broad approach to the distribution of housing taken in the CS is to allocate 75% to the urban areas and 25% to rural areas. The CS</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Inspector considered this broad distribution to be sound (balanced and sustainable) and made it clear that “A much greater focus on urban areas would undermine the vitality of rural settlements, particularly the larger settlements such as Hungerford and provision to meet at least some local housing needs in these settlements”.</p> <p>6. Accordingly, we consider that the increased urban focus underpinning the broad distribution of new housing proposed between urban and rural areas and across the 3 spatial areas of the WBLPR is inequitable, unbalanced and unsustainable, because the resulting reduction in the level of new housing provision in the AONB will undermine the vitality of settlements in the AONB and increase the level of unmet housing need in these settlements.</p> <p>7. One key part of the WBLPR evidence base required to justify the proposed distribution of development and reduction in the level of new housing provision in the AONB is the further landscape assessment of potentially developable sites adjacent to the Rural Service Centres and Service Villages in the AONB, work which the HELAA identifies as being necessary to establish whether these sites can be developed without harm to the natural beauty and special qualities of the AONB. Given the great weight attached to this matter by Paragraph 172 of the NPPF, we consider that such evidence is necessary and proportionate. However, this work has not been undertaken.</p> <p>8. In the absence of this further landscape assessment work, it is not possible for the Council to claim that the Spatial Strategy of the WBLPR is “appropriate and sustainable”, or that the proposed reduction in the level of new housing in the AONB is “equitable” and “commensurate with AONB status”. This is because a reduction in the level of new housing provision cannot be justified without first establishing the capacity of the AONB landscape to accommodate development without causing harm to its natural beauty and special qualities.</p> <p>9. Taking all of the above factors into account, it is considered that the proposed broad distribution of new housing and reduction in the level of new housing provision in the AONB are not justified because they do not represent an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>1. For Policy SP2 to be justified, we consider it is essential to include a specific housing requirement or target for the AONB, expressed as a maximum in order to reflect Paragraph 172 of the NPPF and the landscape objectives of AONB designation.</p> <p>2. In order to achieve “appropriate and sustainable growth” in the AONB we consider that, subject to undertaking the further landscape assessment work required to demonstrate that planned levels of growth can be accommodated without causing harm the natural beauty and special qualities of the AONB, the broad distribution of development between urban and rural areas underpinning the Core Strategy (75% urban, 25% rural) and the current planned levels of new housing development in the AONB identified in Policy ADPP5 of the CS (up to 2,000 new dwellings over the period 2006-2026 at an average rate of 200 dwellings per annum) should be maintained.</p> <p>3. The Policy ADPP5 housing requirement or target for the AONB represents 19% of the overall housing requirement of the CS (up to 2,000 dwellings out of at least 10,500 dwellings). Therefore, to maintain the broad distribution between urban and rural development and maintain the current planned level of new housing provision in the AONB we propose that, subject to the above caveat re landscape assessment, Policy SP2 should include a housing requirement or target figure of up to 1,680 – 1,870 net additional dwellings for the period 2020 – 2037.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP3 Settlement Hierarchy

#### (Proposed Submission LPR Policy: SP3 Settlement Hierarchy)

Number of responses received: 50

Respondent	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Beenham Parish Council (lpr1238)	Parish Councillors noted that Beenham was not deemed to be a service village, therefore had not been included. The Council would be open to considering small affordable housing developments in the village.	Comments noted, no change required.
Chieveley Parish Council (lpr1720)	Policy supported. Subject to comments on Appendix 3 Settlement Boundary Review, Chieveley Parish Council continues to support the settlement hierarchy approach in Policy SP3.	Support for the policy approach is noted. No change required.
Greenham Parish Council (lpr890)	Support for the policy. No further comment.	Support for the policy approach is noted. No change required.
Holybrook Parish Council (lpr1320)	Settlement Hierarchy Policy SP 3 ~Development in West Berkshire will comply with the spatial strategy set out in policy SP1.Eastern Urban Area (Tilehurst, Calcot, Purley on Thames). The urban areas will be the prime focus for housing and economic development. The parish of Holybrook is not mentioned specifically in this policy. Does that mean it is not included in SP3 or is it grouped with Calcot? It is difficult to engender the sense of space in terms of reference within in the document if it does not relate to the area in question. It also diminishes any credibility and reputation that the parish has built since its formation in 2020 (Holybrook is made up of two	Comments noted. The area covered by Holybrook Parish Council falls within the Eastern Urban Area for the purposes of the settlement hierarchy. The settlement hierarchy policy identifies the relative role and function of the different tiers, it does

Respondent	Response	Council Response
	<p>suburbs of Reading: Beansheaf Farm and Fords Farm, together with part of the older suburb of Calcot that lies south of the A4 Bath Road and a section of Southcote). The revised and updated settlement hierarchy ensures that new development planned throughout the Plan period continues to be directed to the more sustainable settlements, is appropriate for the settlement in question and is adequately supported by infrastructure and service. (4.28 p. 24) Infrastructure, in particular healthcare, schools and roads in the Eastern Area has not kept pace with development. The emerging Local Plan has the perfect ideology of stating that any development should be supported by infrastructure and service and yet does not seem to address the current deficiencies or potential future deficiency. How can the healthcare provision be improved when the doctor surgeries are full and the ECG states it has no plans for more surgeries, how can schools offer better service when they are full and are running out of land to develop, how can roads cope with more capacity when there is no space for widening and how can more sustainable transport modes be encouraged when there is no way for, for example, improved cycle lanes? There is no room on our roads for improved cycle lanes unless pavements are used and these are far too narrow for use by pedestrians and cyclists.</p>	<p>not in itself determine development. The policy lists the main settlements which fall within the Eastern Urban Area following the Settlement Hierarchy Topic Paper Methodology. It was decided not to list individual estates within the Eastern Urban Area, however the LPR will include a Policies Map which will show the boundaries of the Eastern Urban Area which will include Beansheaf Farm and Fords Farm.</p> <p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. No change required.</p>
Hungerford Town Council (lpr125)	Support for the policy. No further comment.	Support for the policy approach is noted, no change required.
Newbury Town Council (lpr2270)	We support the settlement hierarchy, especially the need to retain separate identity of adjacent settlements. We regret that the gap between Newbury & Greenham has already almost disappeared but strongly urge that the remaining gap around St Mary's Church Greenham is retained, also the gap east of the Community Hospital which is in Newbury despite having a Thatcham postal address.	Comments noted, Policy DM1: Development in the Countryside sets out a presumption against development outside of adopted settlement boundaries. The Council

Respondent	Response	Council Response
	<p>The expansion of Newbury settlement area into parts of Cold Ash, Shaw, Speen, and Enborne is of concern, especially with the introduction of CIL and the pressure that new development in those parishes puts on Newbury town centre community services, which are “supporting infrastructure”. Therefore, at the earliest opportunity we wish to see a Community Governance Review undertaken by the District Council to adjust parish boundaries, although we realise this is not part of the Local Plan process.</p>	<p>recognises in the LPR the pressure for development, and cumulative impact is an important consideration in the areas which face this pressure, as incremental changes when viewed collectively can significantly change the character of a landscape.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>As noted, parish boundary amendments cannot be considered through the LPR. No change required.</p>
Shaw-cum-Donnington Parish Council (lpr197)	<p>Support for the policy. Response from Shaw-cum-Donnington Parish Council on Local Plan Consultation. SP3 Settlement hierarchy. We support this policy. We note the scale of development proposals will be relative to the existing or proposed level of facilities and services in the settlement and the necessary supporting infrastructure. This is not true of the North Newbury development as almost no additional facilities are being provided apart from a school and existing facilities are only sufficient for the existing village population. Urban area, bullet 3, the retention of the individual identities of adjacent settlements what we see is that developments in villages at the edge of Newbury are seen as dormitory developments and not an integral part of the villages. We note the very poor relation of North Newbury development to Shaw-cum-Donnington with poor road access requiring a car journey via the Robin Hood roundabout to get to the existing village. We recognise that it obtained approval on appeal but in future possible development in this area the relation between it and the settlement must be suitable and enhanced. In bullet 4 we think the necessary support infrastructure should include convenience stores and allotments as well as enhancing</p>	<p>The Council welcomes the support and the contextual comments provided. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, it is a ‘living document’ and will be updated regularly and updated in consultation with infrastructure providers. No change required.</p>

Respondent	Response	Council Response
	<p>existing facilities such as village halls. 4.29 Under Urban Area we note they have a good level of accessibility and frequent public transport. We note that public transport struggles and results in infrequent services that encourage car use. The only ones that thrive are the ones on major routes such as Newbury to Reading. 4.30 We note that development will build on areas that have the infrastructure to support sustainable growth. This has tended to assume that infrastructure in the town centre and ignore the needs of adjacent settlements. For example, Shaw-cum-Donnington and Greenham where local infrastructure has not been enhanced with the addition of further social infrastructure.</p>	
Stratfield Mortimer Parish Council (lpr392)	Support for the policy. No further comment.	Support for the policy approach is noted. No change required.
Streatley Parish Council (lpr116)	<p>Policy is supported.</p> <p>Streatley Parish Council is pleased to note that WBC has determined that Streatley should remain classified as a smaller village, despite the initial classification based on overall scores alone placing it in the Service Village category.</p> <p>Streatley Parish Council supports the view of the Planning Inspectorate report from 2012 that Streatley should remain as a smaller village and confirms that since that report, there has been no material improvement in access to services and facilities; in fact there has been a reduction in transport services in the years following the previous report.</p> <p>Streatley Parish Council also agrees with the decision that the three sites in Streatley that were proposed for possible development have been ruled out in Stage 1 of the site selection process. Streatley is within the North Wessex Downs AONB so any small development, even of only a few additional houses, would have a significant impact on the village and the local environment. The landscape surrounding the village is a precious resource so great care should be taken to protect it and prevent it from being destroyed.</p>	Support for the policy approach is noted. No change required.
Thatcham Town Council (lpr1390)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>The scale of development proposals will be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility." We agree that level of facilities,</p>	Comments relating to Policy SP17 are considered within the relevant Council Response Table.



Respondent	Response	Council Response
	<p>and accessibility are important factors. We note that "Thatcham underperforms other centres in terms of service provision including education - primary, secondary, and SEN; healthcare, community, leisure and sporting facilities", that "the A4 experiences congestion during peak periods", and that " "long queues often forming in peak periods on both sides of the railway, which sometimes do not clear before the barriers come back down". The selection of NE Thatcham is not justifiable based on its underperformance in services, and lack of suitable highways capacity, and is inconsistent with the policy. There is a conflict between the selection of NE Thatcham and the policy SP 3 which is necessary to resolve. Section 4.28 "is appropriate for the settlement in question and is adequately supported by infrastructure and services." Without a published Infrastructure Delivery Plan, it is impossible to evaluate whether there is supporting infrastructure. This is a serious omission from the consultation and failure to provide required evidence. It is necessary for the supporting text to describe the metrics used to assess whether the identified site has supporting infrastructure. What infrastructure has been assessed, and under what conditions is a site identified as being 'adequately supported'. Section 4.30 "The main focus for growth will therefore be Newbury, Thatcham." The comments made in section 4.10 apply here. Section 4.31 "they are still sustainable locations." It is unclear as to what defines an unsustainable location. The policy should indicate if any area in West Berkshire is considered unsustainable.</p>	<p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, it is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The review of the Settlement Hierarchy in West Berkshire assessed the relative sustainability of locations against a set of criteria. The assessment was positive in identifying the most sustainable locations in the District for development. The starting point was not from the perspective of asking where development could not go.</p> <p>The policy is applied to the different levels of the hierarchy. It concludes with reference to "smaller settlements outside the settlement hierarchy" being delivered in accordance with policies SP1 and DC1. [These locations could be considered the least sustainable locations.] No change required.</p>
Tilehurst Parish Council (lpr1981)	The Tilehurst NDP will not be allocating sites (SP1, SP3). It will instead focus on defining policies to ensure that wherever development happens in the Parish it meets the needs and wishes of the local community, takes due consideration of environmental and ecological impacts and protects	Comments relating to the approach being taken by the Tilehurst NDP are noted and the Council will continue to support the

Respondent	Response	Council Response
	green spaces. It will also define infrastructure projects to mitigate the impact and enhance the quality of life for residents.	Neighbourhood Plan Group. No change required.
<b>General consultation bodies</b>		
<b>Other stakeholders</b>		
Tim Hall (lpr640)	Support for the Policy:  Happy with the overall settlement hierarchy but not with the idea that development in Urban Areas be extended into greenfield sites	Support for the policy approach in regards to the settlement hierarchy is noted. No change required.
David Hill (lpr706)	Support for the Policy:  Broadly, the principles of this policy are supported. There is a need to keep the settlement boundaries of these areas under review. Development should be considered on its merits, rather than based upon which side of a line it falls.	Support for the policy approach is noted. No change required.
Councillor Alan Law (lpr1081)	I am in complete agreement with all of this section / Policy. At a personal local level I am pleased the Villages of Streatley and Upper Basildon remain classified as other villages. It is what the overwhelming majority of the residents and the two Parish Councils want in order to preserve their unique landscapes and settings.	Support for the policy approach is noted, no change required.
Councillor Alan Macro (lpr753)	Policy not supported: The imposition of the DEPZs around AWE sites mean that housing site allocations can no longer be made at two of the Rural Service Centres: Burghfield Common and Mortimer. This means that other RSCs and Service villages are being asked to take more housing and thus stretching their infrastructure and services.  [Preferred approach] Modest-sized housing allocations should be made at larger villages that have services such as convenience stores, pubs, primary schools, churches, village halls and/or public transport. Such allocations would increase the viability of the services and help such villages become more sustainable.	Comments noted. Policy SP4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield sets out the policy context for the consideration of development within the DEPZs. The Local Plan must have regard to the DEPZ as set out in paragraphs 45 and 97 in the NPPF.

Respondent	Response	Council Response
		The principles which underlie the spatial distribution stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while conserving and enhancing the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources. No change required.
David Marsh (lpr1826)	Policy neither supported nor unsupported.  No further comment.	Comment noted, no change necessary. No change required.
Peter Norman (lpr1019)	Policy not supported.  SP3 has been derived from an consultation exercise conducted back in 2005 where in deciding where to allocate 10,500 new homes a policy of urban extension was adopted in preference to other measures without any reference to what this meant in practice or the sites which would be needed to deliver on the policy. It was a flawed consultation at the time that had a limited response and to continue with its assumptions under a new LPR to carry us forward to 2037 is a mistake that takes no account of the complete changed planning landscape in terms of environmental priorities (SP16) and the challenges posed by tackling climate change - both priorities that call for a greening of the landscape over greenfield development, and the additional challenges and changes to work patterns and shopping habits posed by Covid 19. To devise an LPR without this would be a fundamental mistake that will burden rather than enhance future generations.  SP3 should be subject to a major consultation exercise revisiting the ground covered in 2005 to reflect the change in priorities we now face to check whether the settlement hierarchy is still relevant	Comments noted. The settlement hierarchy has been reviewed and conclusions set out in the Topic Paper that accompanies the emerging Local Plan Review to 2039. The methodology was subject to consultation in 2018. This has been used to inform policy SP3.  In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be

Respondent	Response	Council Response
	<p>4.29 In the context of Covid 19 just looks wrong and with the change of emphasis to people working from home a major opportunity exists to revive villages to become major community hubs for work and pleasure</p> <p>4.30 Again the emphasis on major urban hubs looked misplaced. Both Newbury and Thatcham could do with major infrastructure investment to catch up with the growth in housing they have already seen but the whole scope of what is required of an urban centre should be revisited and how retail, work hubs and residential space should be provided for going forward</p>	<p>assessed through subsequent reviews, once such implications are realised.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, it is a 'living document' and will be updated regularly updated in consultation with infrastructure providers. No change required.</p>
Deborah Reynolds (lpr2469)	<p>Spatial strategy SP3 and 4 reflect many aspect of national policy. However there is no evidence that the policy alteration associated with exclusions around AWE Burghfield or Aldermaston have been taken into account centrally, thereby updating the national allocations. Residents can rightly expect the Council to have challenged this at the highest level, including by Judicial Review, before producing a plan B such as the Thatcham development. All the materials in the review predate the dramatic alterations associated with online shopping and the COVID-19 pandemic. Therefore it is clear that the housing allocations are flawed in several respects.</p> <p>Recommendation 4 – provide clear evidence of Up To Date national comparable figures for developable land. This must demonstrate that reassessment centrally has been undertaken, demonstrate the impact of this and COVID-19 are all accounted for in the Local plan review. Set demanding targets for conversion of brown field commercial property to residential.</p>	<p>Comments noted. The local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small decrease to 509 dwellings per annum due to slightly improved housing affordability ratios published in March 2021).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p>

Respondent	Response	Council Response
		<p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration. No change required.</p> <p>Up to date national comparable figures for developable land are available and reviewed annually, these are available in data provided for the assessment of the Council's Five Year Housing Land Supply and contained in the West Berkshire Council - Annual Monitoring Report (AMR) and Planning Commitments - Information available <a href="#">here</a>.</p>
Paula Saunderson (lpr954)	<p>Policy not supported:</p> <p>Why is Boxford not in the Service villages? it should be due to its proximity to the A34 &amp; M4? The overdevelopment of Thatcham looks like a completely politically motivated ploy and the Water &amp; Flood Management aspects of 2500 dwellings is poorly explained.</p>	<p>Comments noted. Boxford is assessed within the Settlement Hierarchy Review, the reason why it is not identified as a Service Village is that it lacks the necessary services and facilities to be classified as such following the established methodology. No change required.</p>
Nataliya Topliss (lpr795)	<p>Policy not supported.</p>	<p>Comments noted. Thatcham is correctly identified as an Urban Area</p>

Respondent	Response	Council Response
	<p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>in the Settlement Hierarchy following the established methodology set out in the Settlement Hierarchy Topic Paper. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR. The IDP is a 'living document' and will be updated regularly in consultation with infrastructure providers. No change required.</p>
<p>Councillor Tony Vickers (lpr528)</p>	<p>We support this policy. However the imposition of DEPZs around AWE sites (SP 4) is seriously skewing its application. Housing allocations that would otherwise go to Rural Service Centres (RSCs) in the DEPZs (Burghfield Common and Mortimer) are prevented during this Plan Period, as are allocations in some Service Villages such as Brimpton and Aldermaston. Meanwhile other settlements have to take a larger share, which stretches their infrastructure in some cases. The main impact of SP 4 on SP 3 is the imposition of an excessively large increase in the population of Thatcham (SP 17) in this Plan Period and the subsequent one. This shows no evidence of being sustainable. The imposition of the DEPZs also means that other RSCs and Service villages are being asked to take more housing and thus stretching their infrastructure and services. Modest-sized housing allocations should be made at larger villages that have services such as convenience stores, pubs, primary schools, churches, village halls and/or public transport. Such allocations would increase the viability of the services and help such villages become more sustainable.</p> <p>We want the Council to reconsider SP 4 and SP 17 and instead allocate more housing sites to Rural Service Centres and Service Villages in the Eastern Area and AONB to secure their future viability. This would actually mean following SP 3 in a more logical manner.</p>	<p>Support noted and comments regarding displacement effects of the AWE DEPZ also noted. Comments on SP4 and SP17 acknowledged and are addressed under those policies. No change required.</p>
<b>Landowners, site promoters and developers</b>		
<p>Armstrong Rigg Planning for Manor Oak Homes (lpr2420)</p>	<p>Manor Oak Homes supports the identification of Lambourn as a Rural Service Centre, which are the second tier of the settlement hierarchy. Lambourn is a settlement with a good range of key services and opportunities for employment, community and education and serves a wide catchment area with good accessibility and regular public transport provided to a number of</p>	<p>Support noted.</p> <p>The sites proposed for allocation have been subjected to a rigorous</p>

Respondent	Response	Council Response
	<p>destinations. It therefore meets the definition of a Rural Service Centre that offers development potential appropriate to its character and function.</p> <p>Manor Oak Homes is, however, concerned that the corresponding distribution of housing to Lambourn does not reflect its size or the important role it plays in providing services to a wider rural catchment area than many other Rural Service Centre. The table below (<i>in full representations</i>) provides a comparison between the population of the identified Rural Service Centres and the number of dwellings allocated in the adopted and emerging development plan. This demonstrates that despite being the 3rd largest in terms of population, Lambourn ranked second to last in terms of the number of dwellings it has been allocated. This is a significant concern for the ongoing sustainability of the settlement which is compounded by the unique housing needs of the settlement and the failure of existing allocations to deliver as set out in more detail below. To resolve this issue, we consider that Lambourn should be allocated its fair share of housing which would total c.120 dwellings.</p>	<p>HELAA and site selection process including many factors in assessing suitability rather than the singular measure of population size. Site allocations do not fall under Policy SP3. No amendments to Policy SP3 are required.</p>
<p>Bluestone Planning for Darcliffes Homes Ltd (lpr2426)</p>	<p><i>(comments repeated in lpr2425 under SP1)</i></p> <p>Darcliffes Homes Ltd (hereafter 'Darcliffes') support the principle stated in policy SP1 Spatial Strategy of identifying the locations as set out in the settlement hierarchy in policy SP3 where residential development may take place. This is consistent with the guidance on the general approach to the delivery of new homes, as set out in the NPPF.</p> <p>The densities as set out in the policy are generally supported, although it should also be noted that higher density may also be achievable in certain locations, particularly around the Eastern Area. Careful and sensitive design can deliver higher density, without leading to unacceptable intensification.</p> <p>The policy also refers to the significant commitments throughout the District and as explained below, there are concerns that these either may not come forward during the Plan period and/ or are being built out at a rate which would mean that they are not appropriate for inclusion in the Adopted Plan and therefore alternatives will have to be sought.</p> <p>Policy SP3 sets out the settlement hierarchy and identifies the urban areas which will be a prime focus for housing. It is supported that the Eastern Urban Area will be a focus, although there is a significant imbalance between the numbers allocated to Newbury and Thatcham when compared to Eastern Area, with over 4,000 homes to the former and under 1,000 homes to the latter. This is not considered appropriate given the level of services and facilities provided to the Eastern Area.</p>	<p>Comments noted.</p> <p>Support in principle for Policy SP1 and SP3 noted.</p> <p>Development densities are referred to in Policy SP1.</p> <p>Housing and employment commitments are monitored through the AMR.</p> <p>Policy SP3 does not seek to allocate housing or apportion. The policy purpose is to categorise settlements by their roles and quantum of local services.</p>

Respondent	Response	Council Response
	<p>With regard to the Eastern Area specifically, it is stated that new allocations for Tilehurst and Burghfield will be made through NDPs. This is clearly dependent on the NDP process, which is lengthy and sometimes fraught with difficulties.</p> <p>At the time of writing, Tilehurst for example have not yet published their draft Neighbourhood Plan and therefore it will still be some time before this can be taken to and approved at referendum, and housing can start to be delivered in accordance with such allocations. Although Policy SP14 sets out that the Designated Neighbourhood Area should allocate 175 dwellings, there is no timeframe for when this may come forward or whether this number will be agreed.</p> <p>It should also be noted that in the HELAA the text regarding Tilehurst makes it clear that allocations will be made within the Local Plan Review where not allocated by the NDP.</p> <p><i>“Tilehurst</i>  <i>8.31. Tilehurst Parish is designated as a Neighbourhood Area, and Tilehurst Parish Council are preparing a neighbourhood plan. The Parish Council have expressed an intention to include residential allocation(s) in the neighbourhood plan. The site selection work will therefore be undertaken by the Parish Council.</i>  <i>8.32. In the event that Tilehurst Parish Council choose not to include residential site allocations in the neighbourhood plan, then West Berkshire Council will pick up the site selection work and consider allocations through the LPR.”</i></p> <p>All other locations are to be treated as open countryside (as set out in Policy SP1) and therefore no sites in these areas could be brought forward in accordance with policy. It is therefore considered that housing allocations should also be made either independently or collaboratively in the Review Local Plan or the policy should be more flexibly worded in the urban areas.</p> <p>There is a concern that policies do not go far enough in bringing forward small and medium sized sites, particularly those located on the edge of the identified urban area settlements. As stated above, if such sites are not allocated in the Local Plan Review or in particular, a NDP, because an NDP has either not been developed or has been delayed, there is no mechanism for such sites to be approved in the future. This may be an issue of great concern where some of the larger strategic sites are not deliverable within the Plan period.</p>	<p>Refer to the Council’s responses to representations on SP14.</p> <p>These points are not relevant to SP3. The proposed allocation of sites has been the result of the HELAA and site selection process.</p>



Respondent	Response	Council Response
	<p>It is also unclear from the supply calculations whether or not there has been an undersupply from the Core Strategy 2012 which has been carried forward. Sandleford Park was allocated in the 2012 Core Strategy and has not yet been granted permission. Clarification is sought as to how this has been dealt with and whether further sites should be allocated in this regard.</p> <p>The table in Policy SP13 also sets out that Sandleford Park seeks to accommodate up to 1500 dwellings, whereas the text in paragraph 6.12 states that only 1,000 houses will be delivered by 2037 and the remainder in the following Plan period.</p> <p>This approach is also inconsistent with the encouragement of developers to bring forward small and medium sized sites. The HBF document (2017) 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes' notes (p.29) that:  <i>"For understandable political and financial reasons, planning authorities have increasingly sought to allocate very large strategic sites for residential development in order to satisfy its requirement to demonstrate a five-year land supply. Large sites on the edge of settlements can be less likely to spark political controversy as they are slightly removed from existing communities. For the very same reason, however, they may require substantial infrastructure and up-front financing resulting in relatively lower delivery rates in the early years of the site's existence making rapid delivery unrealistic."</i></p> <p>The latest research from Lichfields (February 2020) 'Start to Finish What factors affect the build-out rates of large-scale housing sites? Second edition' discusses the lead times on large sites and the data is not encouraging:</p> <ul style="list-style-type: none"> <li>• Schemes of 500-999 dwellings take on average approximately 5.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 1,000-1,999 dwellings take on average between 6.9 and 7.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 2,000+ dwellings take on average approximately 8.4 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years. 6.1 years of this are taken up with the planning application process. (see figure 4 of the Lichfields document)</li> </ul> <p>In contrast, smaller sites between 0 and 99 dwellings typically deliver within 3.3 years of the validation of the first application.</p> <p>On this basis it is considered that the following should be taken into consideration:</p>	

Respondent	Response	Council Response
	<ul style="list-style-type: none"> <li>• SP16 Sandlesford Park is allocated for 1,000-1,500 dwellings, taking the above into account, it would take between 6.9 – 7.0 years until the first dwelling is built based on the above assumptions. It should be noted however that the site has been allocated since 2012 and although a number of applications have been submitted, there remains outstanding issues and the site still does not have permission. It is therefore considered that given the length of time taken to date, that the site is unlikely to realistically deliver the numbers proposed.</li> <li>• SP17 North East Thatcham is allocated for 2,500 dwellings, taking the above into account, it would take 8.4 years from validation until the first dwelling is built, based on the above assumptions. There has been no application to date. It unlikely therefore that any dwelling would be built until approximately 2030 and following this, the average annual build-out rate for a scheme of 2,000+ dwellings is an average of 160 dpa (as set out in the aforementioned Lichfields report). On this basis, with the Plan period up to 2037, this would equate to 1,120 dwellings during the Plan period and not 2,500 as set out. It is unrealistic that on an allocation of this size that dwellings could be brought forward to the market at a faster rate.</li> </ul> <p>The HBF document goes on to advise that (p.29-39):  <i>“Once allocated, LPAs are systematically failing to assess on an ongoing or regular basis, the actual delivery achieved against the targets indicated in its local plan. For instance, by allocating one or several very large sites to achieve a five-year supply of land, delays progressing one site through planning will have a substantial impact on the ability of the authority to adequately plan for the number of homes required.....</i>  <i>..... To meet demand for housing, we need more sites of all sizes allocated. Indeed, large sites often deliver new homes at astounding rates, particularly in areas where the market is strong, but small sites are consistently efficient in their delivery. For this reason, the allocation of a wider range of sites within local plan allocations would not only help increase plurality in the housebuilding sector, it would also improve the chances of local authorities’ meeting ambitious supply trajectory plans.</i>  <i>Achieving this all-round positive outcome need not involve overly prescriptive diktats. A subtle shift in policy emphasis, along with a greater focus on ongoing delivery within a local plan period would help to achieve a positive change in behaviours at a local level.....</i>  The above is also irrespective of the fact that many of the smaller HSA sites are already near completion and at least some the numbers should have potentially been counted before the Plan period. Therefore, these numbers are unlikely to be taken forward in the Adopted Local Plan.</p>	

Respondent	Response	Council Response
	<p>In addition, based on last published WBC housing monitoring report (2019), there was a projected windfall allowance of 362 dwellings for the five years up to 2024. To cover the Local Plan Review period to 2037 would suggest a windfall figure of 1,231 dwellings should be included in the supply and not 1979 as currently stated in Table 2 Housing Supply at March 2020. Therefore, there is real danger that the delivery target will not be met due to a reliance on windfalls. This makes very clear that when combined with a lack of flexibility / unclear non-implementation allowance, that there is a need for more allocation sites to bridge the shortfall, in the order at least 700 units.</p> <p>In summary, there is a clear under provision for new sites and further small to medium sites should be considered with flexibility to allow sites on the edge of the urban areas identified to come forward to ensure that sufficient sites can be delivered within the Plan period.</p> <p>[Preferred approach] It is considered that policies SP1 and SP3 should be reworded to provide more flexibility.</p> <p>Other nearby Local Planning Authorities have recognised the issue that can arise where a NDP is not delivered. For example, South Oxfordshire District Council in their Policy H1 of the recently adopted Local Plan (but see also their Core Strategy which also contained a similar policy) set out that: <i>“Where Neighbourhood Development Plans are not progressed in larger villages and market towns, planning applications will be considered against the housing delivery targets for the towns and larger villages set out in this Plan.”</i></p> <p>A form of words reflecting the above, would ensure that there would be sufficient flexibility to take into account any NDP problems and Policy SP1 should be amended accordingly, with and SP3 and DC1 given clarification in this regard.</p> <p>To reflect this and the potential undersupply of housing, further small to medium sites should be also be added to policies SP13-14, with any update to SP12 as a result. Darcliffe Homes are proposing two such sites within the Eastern Urban Area, which would deliver up to 80 dwellings. The supporting text at paragraph 6.22 would also need to be updated in this regard.</p> <p>The addition of further small to medium sites such as these will require a re-consideration of the capacity of the strategic-scale sites to reflect realistic expectations. Revising the site capacities slightly downward to accommodate a shift of dwelling numbers will not however adversely affect the ability of the promoters to bring the strategic sites forward for development, but will allow a longer period for developing out the entirety of the site, which is likely to run into the following Plan period.</p>	<p>The preferred approach of including more flexible wording to facilitate NP allocations is noted. However, Policy SP3 is not the correct policy to consider this issue. Please refer to SP12 (SP13-14). No amendment to Policy SP3 is required.</p>

Respondent	Response	Council Response
	Allocating additional small to medium sites will also have a positive effect on the smaller scale and local housebuilding industry, which includes Darcliffe Homes, in providing opportunities that will help to continue to sustain this important re-emerging sector of the housebuilding industry.	
Carter Planning for RLA Jones (lpr1900)	Support. We welcome the re-incorporation of Lambourn as a Rural Service Centre with the ability to meet local housing needs through the allocation of housing sites.	Support noted. No changes to Policy SP3 are required.
Onalee Cubitt (lpr2190)	Regarding these specific representations as they relate to the emerging allocation at Kintbury, both the landowners and Sovereign support policy SP3 and the identification of Kintbury as a service village and one that is capable of supporting growth. We would add that the village also benefits from a main line train station, which sits on the Taunton to Reading line, with direct links to the south west and wider south east. Moreover, the St Mary's Primary School is very well respected and indeed received a Good rating from its most recent Ofsted report, whilst the Kintbury Surgery received a Good rating as part of its most recent CQC inspection. The village is therefore very sustainable, having a good range of quality services, as well as good infrastructure links with the wider District and beyond. Furthermore, as part of our comments regarding the school, we are aware that the school appears to be operating under capacity with regards new intakes. There is therefore a need for the village to take more growth, not only because the existing services have capacity, but because it is going to make these valuable services more sustainable.	Comments noted. Comments are not proposing any change to the policy per se but seeking an increase in the housing allocation for Kintbury. Kintbury has been assessed in the Settlement Hierarchy as a 'service village', having taken into account existing services in accordance with the agreed settlement hierarchy methodology that was subject to consultation in 2018. The settlement hierarchy methodology and the subsequent designation for Kintbury is not proposed to be changed. As a result no changes to Policy SP3 are required.
Fisher German for Musgrave and Begley (lpr1228)	The identification of Chieveley as one of the most sustainable settlements in West Berkshire is supported, as is its identification as a Service Village. As demonstrated by the Council's published supporting Settlement Audit, Chieveley benefits from a high level of service provision, which serves both the settlement itself and wider rural hinterland, particularly the smaller hamlets to the north and west. Policy SP3 states that Service Villages offer some limited and small-scale development potential, appropriate to the character and function of the village. Such development will be delivered to meet local needs through development within the settlement boundary and through new allocations. Whilst windfall infill development can be appropriate, it is vital to ensure there is sufficient land allocated to deliver housing needs for a number of reasons. First, the supply of infill land is likely to be highly constrained, particularly having regard for the level of such development	Support noted. No amendments to Policy SP3 are required.

Respondent	Response	Council Response
	<p>to date. Suitable infill land is a highly finite resource, and it cannot be expected to continue to deliver at past rates, as suitable sites and opportunities to deliver such development will have diminished by now historic windfall delivery. Secondly, there is considered to be significant benefit in seeking to positively meet local housing needs through housing allocations, as piecemeal development will not contribute to the funding of infrastructure through developer contributions nor contribute to the delivery of much needed affordable housing. The positive allocation of land, combined with robust site-specific policies will ensure the delivery of high-quality development, and the provision of funding for any infrastructure deficiencies and the provision of much needed affordable housing.</p>	
<p>Fowler Architecture and Planning Ltd for Denford Park Pastures East Ltd (lpr2212)</p>	<p>The town of Hungerford is designated as a rural service centre within the Settlement Hierarchy. It is the Representors' contention that Hungerford has been miscategorised within the hierarchy. Policy SP20 notes that Hungerford has a town centre. This is a correct reading of the centre of Hungerford, which hosts a wide range of services and facilities, across a significantly sized, urbanised, and easily accessible area. Hungerford and Thatcham are the only two such Town Centres within the District, with Newbury also having a Major Town Centre as defined by Policy SP20. This reflects the sustainability of the settlement and its suitability for intensification of commercial use across the town.</p> <p>The Settlement Hierarchy Review that forms part of the evidence base did not seek to reconsider the 'Urban Areas' tier of the hierarchy, assessing only those settlements defined within Policy C1 of the HSA DPD that already sit in the lower tiers. This is methodologically unsound. The town of Hungerford meets the definition of an Urban Area set out within this Review and has the strategic importance expected of such a settlement. Indeed, the SA/SEA Scoping Report notes that "approximately 73% of the population is concentrated in the Kennet Valley at strategic points along the A4 (Newbury, Thatcham and Hungerford) and on the western side of Reading".</p> <p>The Audit completed as a part of the Settlement Hierarchy Review found that the town of Hungerford attained a score of 46, higher than any other settlement audited. Qualitative assessment as to why Hungerford has not been re-designated an Urban Area is not available, and as such its exclusion from this tier is not justified. Policy SP3 is therefore considered to be unsound.</p>	<p>Comments noted. Disagree that Hungerford has been incorrectly defined within the settlement hierarchy. Hungerford has been correctly defined as a town rather than an urban area.</p> <p>The Topic Paper did not set a threshold for 'major urban areas'. The fact of Hungerford being considered the most sustainable location amongst the remaining settlements, does not mean it automatically needs to be re-classified. The reference to the concentration of population along the Kennet Valley does not imply that Hungerford is a major urban area merely by association with Newbury and Thatcham.</p> <p>No amendments to Policy SP3 are required.</p>
<p>Hallam Land Management (lpr2334)</p>	<p>The settlement hierarchy set out in the emerging draft identifies Mortimer as a Rural Service Centre, where non-strategic sites can be allocated for housing through other policies in this emerging Plan or in Neighbourhood Plans.</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>The hierarchy is not contested, and it is agreed that Mortimer, as a Rural Service Centre, has <i>a good range of key services and opportunities foremployment, community and education.</i></p> <p>When comparing the three Rural Service Centres of Mortimer, Theale and Burghfield Common, it is clear to see that Mortimer is less physicallyconstrained than the other two settlements. Theale is constrained to the east by the M4 and to the south by the River Kennet and surrounding wetlands. Burghfield Common has extensive woodland areas surrounding the settlement, including the Wokefield Common Nature Reserve, and is within the Atomic Weapons Establishment safeguarded zone for Burghfield. Consequently, Mortimer should be a focus for residential development, and it is inconceivable and inappropriate not allocate any housing in this emerging plan to Mortimer to meet the housing need in the Eastern Area or indeed to sustain the existing community.</p>	<p>This representation appears to refer to the site selection process rather than the settlement hierarchy policy. Agreement that Mortimer is correctly categorised as a Rural Service Centre is noted.</p> <p>These points are not relevant to SP3</p> <p>The proposed allocation of sites has been the result of the rigorous assessment through the HELAA and site selection process.</p> <p>No changes to Policy SP3 are required.</p>
Lichfields for North East Thatcham Consortium (lpr2393)	<p>Policy SP3 sets out the proposed settlement hierarchy which identifies the key urban areas in West Berkshire, including Newbury and Thatcham. Paragraph 4.30 of the supporting text sets out a narrative that “Focusing further growth in these areas has the potential to make the best use of previously developed land and house residents close to jobs, shops, leisure and cultural facilities and public transport.” While that may be the case, we consider that the sentence be amended (or supplemented) to reflect that much of the actual growth in principal urban areas will be met on greenfield sites as part of the strategy for delivering infrastructure and supporting the vitality of those settlement. This would align the narrative of Policy SP3 with policies later in the plan allocating sites primarily on the principal settlements urban edge.</p> <p><b>Review of the West Berkshire Settlement Hierarchy (background report)</b></p> <p>We have reviewed the report and note that it concludes that Thatcham (as well as Newbury and the Eastern Area to Reading) will continue to act as the District’s urban areas, providing a wide range of services and opportunities for employment, community and education and serving a large catchment area with good levels of accessibility and frequent public transport to a large number of destinations. We are therefore content that the report evidences that development in Thatcham would be sustainable on that basis. This is in conformity with the NPPF which states at paragraph 9 that “Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.” As set out below, the needs of Thatcham also relate to the role of strategic development to help regenerate the town.</p>	<p>Comments noted.</p> <p>The Council does not agree there is a need to amend paragraph 4.30. The paragraph explains one of consequences of the policy and the settlement hierarchy. In relation to the hierarchy and the strategy, it would be incorrect to refer in paragraph 4.30 to greenfield sites. No amendments to Policy SP3 or the supporting text is required.</p> <p>Comments on the Review of the Settlement Hierarchy Topic Paper noted.</p>

Respondent	Response	Council Response
<p>Nexus Planning for Pangbourne Beaver Properties Ltd (lpr1650)</p>	<p>We support the settlement hierarchy identified in Policy SP3 which is based upon the evidence provided in the document entitled Review of Settlement Hierarchy Topic Paper. We support the continued identification of Pangbourne as a Rural Service Centre which, based on the definition in Policy SP3, are larger rural settlements with development potential appropriate to the character and function of these settlements through infill development, non-strategic sites allocated in the Local Plan, and rural exception sites. Table 1 adds that these are Settlements with a good range of key services and opportunities for employment, community and education. They serve a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations. Para 4.31 adds that Rural Service Centres provide: a focal point for the surrounding villages and rural areas in terms of the provision of services and facilities. Although they do not have as wide a range of services as the urban areas, they are still sustainable locations. More specifically, Appendix 3 of the Review of Settlement Hierarchy Topic Paper identifies that Pangbourne scores 40 points in the Council's Audit Matrix and Settlement Scores, behind only Hungerford and Theale (and equal with Tadley/Pamber Heath) in terms of its sustainability. In common with Hungerford and Theale, but unlike the majority of the other Rural Service Centres, Pangbourne includes a mainline railway station with direct access to Oxford and Reading/London As we highlighted in our representations in 2018, given that some of the identified Rural Service Centres benefit from a railway station whilst others do not, we suggested that the classification could be divided in to two: Primary Rural Service Centres - comprising those with good access to a railway station ie Hungerford, Mortimer, Pangbourne and Theale Secondary Rural Service Centres comprising those that are distant from a railway station ie Burghfield Common and Lambourne. Development should be directed to Primary Rural Service Centres in the first instance. The Council has chosen not to do this. However, it is essential that the housing strategy that they adopt is consistent with these key principles i.e. focusing development in the most sustainable locations. In fact, as set out in further detail in our representations to Policy SP15, the Council is doing the opposite. They are making no allocations at the highly sustainable Rural Service Centre of Pangbourne whilst making allocations in less sustainable Rural Service Centres such as Burghfield Common(37) Lambourn(35) and Mortimer(36). Even more inappropriately, the Council in fact proposes to make housing allocations at settlements such as Bradfield Southend(21), Great Shefford(22), Cold Ash(23), Hermitage(24), Chieveley(26) and Compton(31) settlements identified only as Service Villages and, therefore, equally constrained but significantly less sustainable than Rural Service Centres such as Pangbourne. It is inconsistent, inappropriate and unsound to make allocations in such locations when making no allocations in a highly sustainable location such as Pangbourne. Climate change It is noted that Policy SP 5 Responding to Climate Change states The principles of climate change mitigation and adaptation will be embedded into new development, improving the resilience of land, buildings and existing and</p>	<p>Support for the settlement hierarchy as set out in the Topic Paper, Policy SP3 and the identification of Pangbourne as a Rural Service Centre is noted.</p> <p>Where a development is suitable and available, Policy SP3 helps steer development to the most sustainable locations befitting the role and function of particular settlement within the hierarchy. The policy itself does not generate suitable development sites nor does it rank the order in which development should be allowed, or directed, to come forward. Local housing need is distributed across the District.</p> <p>Responses to the representation for SP15 have been considered under that policy. No changes to Policy SP3 are required.</p>

Respondent	Response	Council Response
	<p>future communities to the opportunities and impacts arising from climate change. All development should contribute to West Berkshire becoming and staying carbon neutral by 2030. Depending on the nature and scale of proposals, development will be expected to satisfy all of the relevant following criteria: To withstand predictable effects from climate change for its expected lifetime; To withstand predictable effects from climate change for its expected lifetime; To achieve the highest viable levels of energy efficiency; To generate and supply renewable, low and zero carbon energy for its own use and/or local distribution networks in accordance with policy DC3; To provide for sustainable forms of vehicular and personal transport to and from the site and reduce car use in accordance with policies SP22, DC36 and DC37; In order to reduce car use it will be necessary to allocate housing to settlements that have railway stations and to allocate sites that are within walking distance of railway stations. This is a further justification for allocating PAN 8 in Pangbourne.</p> <p>To ensure that the Council's spatial strategy is applied correctly, having regard to the objective to accommodate appropriate and sustainable growth within the North Wessex AONB spatial area as identified in Policies SP1 and SP2, Policy SP 15 must be amended to ensure that a site/sites at Pangbourne are identified for housing. For the reasons set out in our representations to Policy SP15, this should include the allocation of 35 - 40 dwellings at Site Ref: PAN8 (Pangbourne Hill).</p>	
Pegasus Planning Group for Calcot Park Golf Club (lpr2321)	<p>This policy states that development in West Berkshire will comply with the spatial strategy set out in policy SP1. Development will be focused on the most sustainable settlements. The Urban Areas (including Calcot) will be the prime focus for housing and economic development, offering development potential through: regeneration of built-up areas; allocated sites in development plans; retention of settlement identity and necessary supporting infrastructure.</p> <p>In this case, we consider that land at Calcot Park Golf Club (CPGC) is suitable for allocation in a development plan, as it lies within the settlement of Calcot, which is considered to be a suitable and sustainable location for residential development, according to this policy.</p> <p><i>Policy SP3 – Settlement Hierarchy is supported.</i></p>	<p>Support noted. Agreement that Calcot is correctly categorised within the Eastern Urban Area is noted. Points relating to Calcot Park Golf Club are not relevant to SP3. The proposed allocation of sites has been the result of the rigorous assessment through the HELAA and site selection process. No changes to Policy SP3 are required.</p>
Pegasus Group for Donnington New Homes (lpr1942)	<p>As with Policy SP1, the identification of Newbury and Thatcham as the main focus for new development in West Berkshire is wholly supported. Both settlements are the most sustainable locations for new development providing a range of services. New development with the associated increase in population will support the viability of existing, and assist in supporting new,</p>	<p>Support noted.  Agreement that Newbury and Thatcham are correctly categorised</p>



Respondent	Response	Council Response
	services and facilities meaning both Newbury and Thatcham can continue to be the key economic and social hubs within the District.	as urban areas is noted. No changes to Policy SP3 are required.
Pegasus Planning Group for Newbury & Crookham Golf Club (lpr2049)	<p>Policy is supported.</p> <p>This policy states that development in West Berkshire will comply with the spatial strategy set out in policy SP1. Development will be focused on the most sustainable settlements. The Urban Areas (including Newbury) will be the prime focus for housing and economic development, offering development potential through: regeneration of built-up areas; allocated sites in development plans; retention of settlement identity and necessary supporting infrastructure.</p> <p>In this case, we consider that land at Newbury and Crookham Golf Club (NCGC) is suitable for allocation as a residential site in the development plan, as it lies on the edge of the settlement of Newbury and is adjacent to an existing bus stop on an established bus route (Number 2 and 8 services). As such, the proposed application site, the location of which is provided within Appendix 1 to this document, is a suitable and sustainable setting for residential development, according to this policy.</p> <p>Further, it is considered that the site qualifies for inclusion within the Newbury settlement boundary as part of the ongoing review set out in Appendix 3 of the Local Plan on the following grounds:  <i>“Boundaries will include:  Single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development constraints”.</i>  Policy SP3 – Settlement Hierarchy is supported and request is made for the land identified for development at NCGC to be included within the revised settlement boundary of Newbury.</p>	<p>Support noted.</p> <p>Points relating to land at Newbury and Crookham Golf Club are not relevant to SP3. The proposed allocation of sites has been the result of the rigorous assessment through the HELAA and site selection process.</p> <p>No changes to Policy SP3 are required.</p>
ProVision for Cala Group Ltd (lpr2412)	<p><i>In context of two sites: East and West of Salisbury Road, Hungerford. Full representations attached.</i></p> <p>Hungerford continues to be identified as a ‘Rural Service Centre’ (RSC), the second tier of settlements in the hierarchy (draft Policy SP3), second only to the main ‘Urban Areas’, including Newbury and Thatcham.</p> <p>RSCs are identified in the LPR as being suitable for proportionate growth, to sustain them and help meet local needs, including through non-strategic site allocations.</p> <p>Hungerford is therefore an appropriate location for development over the plan period.</p> <p>Given the town is entirely within the North Wessex Downs Area of Outstanding Beauty (AONB), development potential is constrained by landscape considerations.</p>	<p>Comments noted. No changes to Policy SP3 are required.</p>

Respondent	Response	Council Response
ProVision for Mr & Mrs Mathew Pittard (lpr1958)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached as a response to Policy SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham.</i></p> <p>In setting out the proposed settlement hierarchy for the District, policy SP3 builds upon the spatial strategy outlined in policy SP1. The Urban Areas are the most sustainable locations in the District and are therefore correctly identified as being the focus for growth. We agree with the hierarchy proposed, which has been informed by the Review of Settlement Hierarchy Topic Paper (November 2020).</p>	<p>Support noted.</p> <p>No changes to Policy SP3 are required.</p>
ProVision for Trustees of Allan Snook Will Trust (lpr1918)	<p><b>Development in the Smaller Villages</b></p> <p>The National Policy Framework ('the Framework'), at paragraph 78, confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.</p> <p>The Council's current approach to 'smaller villages' seeks to severely restrict any housing growth, such as at Boxford, to infill and minor development only within the settlement boundary. This approach is flawed and the effect of failing to permit any reasonable scale development in these villages will further raise house prices to levels which create cost barriers for residents and workers. Furthermore, the lack of affordable housing provision will determine who can live in these rural villages.</p> <p>In the 'smaller villages', the Council should seek to bring forward opportunities for transformational forms of growth to enhance their vitality and viability and to support the wider rural economy. Specifically, reasonable scale sites can provide a suitable housing mix and variety of tenures to meet local needs. Indeed, these sites may help attract and retain younger residents and provide housing for older residents to downsize and, as a result, potentially free up larger family housing in the village. Younger residents and larger households can generally put more money into the local economy through local shops, pubs and sporting facilities which in turn support older, less mobile residents by keeping facilities local and more accessible.</p> <p>Furthermore, reasonable scale development in the 'smaller villages' may be able to help rural communities deliver their aspirations for new local infrastructure either by providing a land resource or via S106/CIL contributions.</p>	<p>Comments noted.</p> <p>The objector appears to be seeking greater flexibility from the settlement hierarchy for the 'smaller villages' in the form of 'transformational forms of growth' of a 'reasonable scale'.</p> <p>Instead, this level of growth is assessed through Policy SP1 and DM1 with DM16 and 22 dealing with development in the countryside, rural exceptions housing and rural workers housing. It is considered that there is enough breadth in the LPR to account for such rural needs in light of the policy restrictions outside of the urban areas. No amendment to Policy SP3 is required.</p>

Respondent	Response	Council Response
	<p>Whilst a settlement boundary review may provide limited small-scale sites for development in the 'smaller villages', there is likely to be little opportunity for any significant housing within village confines. As such, we consider that, where possible, additional allocations of a reasonable scale should also be made in the 'smaller villages' with a defined settlement boundary. Alternatively, the Local Plan should require villages to prepare Neighbourhood Plans to allocate sites to deliver reasonable scale growth to enhance their vitality and viability and that can help deliver the aspirations of the community.</p>	
<p>ProVision for Sir Richard Sutton Ltd (lpr2080)</p>	<p>Whilst the draft LPR's spatial strategy allows for non-strategic housing to be allocated to smaller villages (either as allocations in the RLP or in a Neighbourhood Plan) the draft Plan only makes housing site allocations at Service Villages and above (although no reasoned justification for this is given). It is therefore relevant to examine the assessment of Stockcross to establish whether it was correctly categorised as a "Smaller Village".</p> <p>The evidence base that informed the preparation of the draft LPR includes a Review of Settlement Hierarchy Topic Paper. In the ranking process described in the Topic Paper, Stockcross scores 21 points. Bradford Southend also scores 21 points but is categorised as a Service Village. Great Shefford (22 points), Woolhampton and Cold Ash (both 23 points) are also categorised as Service Villages. There is therefore no, or only a marginal difference between the assessed level of services and facilities at Stockcross and other settlements that have been categorised as Service Villages, and where housing site allocations are proposed.</p> <p>The audit of services and facilities at Stockcross is summarised at Appendix 2 of the Topic Paper. In our view that is a comprehensive range of services and facilities and indicates that Stockcross is a thriving village community serving the surrounding area. The Audit confirms that a score of 21 is within the category of a Service Village but then goes on to arbitrarily conclude that Stockcross should nevertheless be categorised as a Smaller Village citing "<i>limited other community services</i>", "<i>minimal public transport links</i>" and its proximity to Newbury which "<i>mitigates against the potential of the village to function as a standalone Service Village to the surrounding area</i>". None of those comments and the consequential decision to downgrade Stockcross are justified.</p>	<p>Comments noted</p> <p>Stockcross has been correctly defined as a 'smaller village', scoring 21 points within the methodology.</p> <p>Appendix 5 of the methodology states: <i>Stockcross scores 21 points in the settlement hierarchy matrix, within the category of service village. It has access to four key services and facilities in the form of a post office, primary school, convenience store and village hall. Its remaining community services are limited and its public transport links are minimal. It has a very small population of 260. Its size relative to the major urban area of Newbury which is only 3 miles away mitigates against the potential for the village to function as a stand alone service village to the surrounding area. It should be classified as a smaller village outside of the settlement hierarchy.</i></p>

Respondent	Response	Council Response
	<p>In a rural context Stockcross has a good (certainly not minimal) bus service. It lies on the Lambourn – Newbury bus route which provides a two hourly service weekday service to Newbury. In addition, there is an active Community Bus serving the area.</p> <p>Contrary to the Audit’s conclusion, Stockcross has a good range of other community services. The eight acre recreation ground is at the heart of the community. This is a Queen Elizabeth II Field in Trust, ensuring that future generations will have access to outdoor space for sport, play and recreation. The site includes a children’s play area and is used extensively by dog walkers. AFC Newbury use the ground for Sunday Football League and training on weekday evenings. Stockcross Tennis Club has two tennis courts and a pavilion.</p> <p>The Speen Parish Council’s “Improvements Plan 2020/2021”, includes providing the provision of a new Pavilion at Stockcross Recreation Ground and a footpath to link it to the Stockcross School. There are also a number of local employment opportunities which the Council Audit fails to acknowledge (including Bayford Court Care Home, the Vineyard hotel and restaurant, and the Lower Woodspeen Court Business Centre as well as the Benham Estate itself). There are well used allotments in Glebe Lane.</p> <p>From the above it can be concluded that:</p> <ul style="list-style-type: none"> <li>• Stockcross should be categorised as a Service Village because the Council’s Audit itself scores the village at that level, and, furthermore, because that Audit does not properly reflect the nature and extent of the village’s services and facilities and vibrancy of the community.</li> <li>• The decision to categorise Stockcross as a Smaller Village is not justified.</li> <li>• As a Service Village, it would clearly be appropriate and consistent with the RLP’s spatial strategy, to allocate a housing site, or sites at Stockcross, to help sustain the existing range of services and facilities.</li> <li>• Notwithstanding and without prejudice to the above, even as a Smaller Village, Stockcross should be considered a suitable location for the allocation of small scale housing site to</li> </ul>	<p>Disagree that Stockcross has been incorrectly classified in relation to Great Shefford, Woolhampton and Cold Ash given the differences in services and facilities between them and Stockcross’ proximity to Newbury.</p> <p>Stockcross only has a 2 hourly bus service, Woolhampton for example has a train station in addition to a 30 minute bus service.</p> <p>The recreation ground was included in the scoring in accordance with the methodology as was the children’s play area.</p> <p>The audit of facilities and services looks at existing provision only. The 2km buffer zone for employment opportunities did not exceed 100 VAT registered businesses and thus was correctly scored as zero.</p> <p>In light of the above, there is no justification for a change in the status of Stockcross within the settlement hierarchy and therefore no amendments to Policy SP3 are required.</p>

Respondent	Response	Council Response
	<p>contribute to delivering a range of site sizes for residential development in accordance with Policy SP1.</p> <p>[Preferred approach]</p> <ul style="list-style-type: none"> <li>• Stockcross should be categorised as a Service Village because the Council’s Audit itself scores the village at that level, and, furthermore, because that Audit does not properly reflect the nature and extent of the village’s services and facilities and vibrancy of the community.</li> <li>• even as a Smaller Village, Stockcross should be considered a suitable location for the allocation of small scale housing site to contribute to delivering a range of site sizes for residential development in accordance with Policy SP1.</li> </ul>	
ProVision for The Wasing Estate (lpr2065)	<p><i>In relation to land at Manor Farm, Brimpton (full representation attached).</i></p> <p>SP3 categorises Brimpton as a ‘smaller village’ in the settlement hierarchy. Both policies permit (in principle) limited infill or minor development in ‘smaller villages’, acknowledging that “<i>some limited development is important for the long-term sustainability of rural communities</i>”.</p> <p>Draft Policy SP3 does (in principle) allow for non-strategic sites allocated for housing and economic development, albeit at the ‘service village’ level, through other policies in the Plan or in Neighbourhood Plans. We support this and would add that allocating non-strategic sites to ‘smaller villages’ would not be inconsistent with the draft LPR spatial strategy.</p> <p>The evidence base that informed the preparation of the draft LPR includes a review of the settlement hierarchy, set out within the ‘Settlement Hierarchy Review Topic Paper’. The methodology for the review comprised of a scoring system based on sustainability of settlements in terms of provision of services and facilities. The Topic Paper explains that ‘smaller villages’ score between 0-15 points, ‘service villages’ between 16-30 points and ‘rural service centres’ score over 30 points. Brimpton is placed at the higher end of the ‘smaller villages’ category, scoring 10 points. Brimpton has a good range of services and facilities, including a primary school, a village hall, a public house, a hairdresser and a church. The village shop unfortunately closed three years ago. There are also bus stops providing regular services to Thatcham, Beenham and Calcot, as well as a community transport scheme. Brimpton is also within close reach of Thatcham and Baughurst to access other services and facilities which are not available in the village, as and when required. Brimpton is a suitable location for the allocation of small-scale housing sites to contribute to a range of site sizes for residential development, in accordance with draft Policy SP1. Housing allocation sites should not be dependent on the level and extent of existing service and facilities but instead should be seen as a mechanism to support these services and facilities. Rural housing is essential to ensure their long-term viability and retention. If development in the ‘smaller villages’</p>	<p>Comments oted.</p> <p>The settlement hierarchy methodology was established in order to support the Core Strategy and Housing Site Allocations DPDs. The Review of Settlement Hierarchy Topic Paper has applied the criteria equally to all the settlements in order to ensure a consistent treatment in identifying the most sustainable locations for development. The criteria did not include an assessment of the level of development that might enable the development of more services and facilities. [It is conceivable that had such a criteria been possible to measure and included in the review that many other settlements might have also been scored and the hierarchy remained the same or similar.]</p>

Respondent	Response	Council Response
	<p>continues to be severely restricted, rural communities and their valued services and facilities will continue to decline. Brimpton has in fact already lost a post office and convenience store and so without opportunities for growth, it is conceivable that its remaining services and facilities will disappear. The pub has been struggling for a number of years, whilst Arkells, the brewery owner, are known to be trying to close it down, and there is also a lack of a community centre. It is vital therefore that essential community services can be supported by an appropriate population.</p> <p>Housing site allocations at Brimpton would be consistent with the LPRs overarching spatial strategy to promote the sustainability of villages and in turn, supporting the wider rural economy, noting that “where there are groups of smaller settlements, development in one village may support services in a village nearby”</p>	<p>Consequently it is not considered appropriate to amend the methodology at this stage given the two previous consultations on settlement hierarchy and therefore no amendments to Policy SP3 are required.</p>
<p>ProVision for The Wasing Estate (lpr2070)</p>	<p><i>In relation to Basingstoke Road, Aldermaston Wharf (ALD5)</i></p> <p>The categorisation of Aldermaston Wharf as a ‘smaller village’ in the settlement hierarchy review is not justified. It is clear that it meets the criteria for a ‘service village’, both in terms of its performance and function and its scoring.</p> <p>It is a sustainable rural settlement which not only offers key services and facilities, but is highly accessible, benefitting from excellent public transport, as well as a cycle and footpath link to the neighbouring Aldermaston Village. Aldermaston Wharf and Village should be considered holistically.</p> <p>Nonetheless, even as a ‘smaller village’, Aldermaston Wharf is suitable for housing allocations proportionate to the size and nature of the village.</p> <p>Housing allocations should not be precluded on the basis of limited existing services and facilities. Rural housing is essential to ensuring the long-term viability and retention of these services and facilities. Modest, sustainable growth helps to enhance the vitality of rural communities and the wider rural economy, with groups of settlements supporting each other.</p> <p>We consider the concerns raised in the HELAA can be addressed and overcome through a combination of the commissioning of technical reports and careful design, resulting in a suitable, available and achievable site.</p> <p>The site represents a logical opportunity for a small-scale housing allocation and extension to Aldermaston Wharf. It would contribute towards the delivery of a range of site sizes for residential development, assisting in meeting the Council’s housing requirements whilst facilitating sustainable rural growth.</p>	<p>Comments noted.</p> <p>The settlement hierarchy methodology was established in order to support the Core Strategy and Housing Site Allocations DPDs. The Review of Settlement Hierarchy Topic Paper has applied the criteria equally to all the settlements in order to ensure a consistent treatment in identifying the most sustainable locations for development. The criteria did not include an assessment of the level of development that might enable the development of more services and facilities. [It is conceivable that had such a criteria been possible to measure and included in the review that many other settlements might have also been scored and the hierarchy remained the same or similar.]</p> <p>Consequently it is not considered appropriate to amend the methodology at this stage given the</p>

Respondent	Response	Council Response
		two previous consultations on settlement hierarchy and therefore no amendments to Policy SP3 are required.
Rectory Homes Ltd (lpr1847)	<p>Established in the 1990s, Rectory is a small-medium sized housebuilder operating in Oxfordshire, Buckinghamshire, Berkshire and the wider Home Counties. Our focus is on small to medium sites in towns and villages and we specialise in high quality housing developments built to reflect the local vernacular using locally sourced natural and sustainable materials. We have an interest in the existing and emerging planning policies for West Berkshire District having secured land options for a number of sites within the District. Small sites are extremely important in rural areas such as West Berkshire, especially as they can be delivered quickly; small schemes generate little adverse impact and can deliver a range of positive benefits to local communities. The Government’s objective to increase the amount of housing delivered by small and medium sites is clear and the important contribution that such sites can make to meeting the housing requirement of an area is reflected in the NPPF. Whilst we generally agree with the strategic approach to development in the District as outlined in the settlement hierarchy and Policy SP3, the requirements for development in the service villages are considered unduly restrict. We consider directing small-scale development at these locations to be appropriate however the first bullet point then refers to minor development. It is generally accepted that minor development constitutes schemes of less than 10 dwellings therefore through the addition of the wording of minor development Policy SP3 restricts development schemes at service villages to a maximum of 9 dwellings on any specific site. This would discount the delivery of larger sites which are otherwise generally unconstrained or considered suitable for development. The wording of the policy already mentions small-scale development which is a more flexible terminology, requiring assessments to be made of the relative growth of the settlement through a development in terms of either settlement size or increase in existing stock for example. This is considered sufficient to guide development at the service villages. There is also a potential conflict with Policy SP1 which requires development schemes to achieve a minimum density of 30 dwellings per hectare in the service villages. If the wording of minor development is retained within Policy SP3 and therefore schemes are limited to 9 dwellings, this would mean that for sites any larger than 0.3ha in size the density of the development would be contrary to the required threshold of Policy SP1. Furthermore, in line with Paragraph 63 of the NPPF developments of less than 10 dwellings located outside of the designated areas are not required to provide affordable housing. This means that no affordable housing will be delivered in service villages located outside of designations such as the AONB and therefore this social benefit will be lost. In light of the above, the presence of the term small scale in</p>	<p>Comments noted. Noted that the strategic approach to development in the district is supported as outlined in Policy SP3.</p> <p>The objector appears to be seeking greater flexibility from the settlement hierarchy for the ‘smaller villages’. Disagree with the interpretation of ‘minor development’ in the policy. In ‘service villages’ the policy accepts ‘small scale development’. In the bullet points, this is clarified by meaning to include infill, change of use and minor development. Minor development in this case points to ‘householder development’.</p> <p>For clarity the policy will be amended as follows –  <b>‘Rural Service Centres: ...</b>  These larger rural settlements offer development potential appropriate to the character and function of the settlement through:  e. Infill <u>or</u> changes of use <del>or other development</del> within the settlement boundary....  <b>Service Villages: ...</b>  These smaller rural settlements may offer some limited and small-scale development potential, appropriate</p>

Respondent	Response	Council Response
	<p>guiding the scale of development at the service villages is considered sufficient and the requirement of minor development should be removed from the wording of the policy.</p>	<p>to the character and function of the village, in order to meet local needs through:  h. Infill <del>or</del> changes of use <del>or other</del> <del>minor development</del> within the settlement boundary.....’</p> <p>and the supporting text will be amended as follows –  ‘Settlements outside of the settlement hierarchy will deliver additional development but this will be limited to infill or <u>change of use</u> <del>minor development</del> within the settlement ....’</p>
<p>Rural Solutions for Karine Giannamore and Kathryn Fellowes (lpr2308)</p>	<p>Whilst it is important to establish a district-wide settlement hierarchy, this shouldn’t be seen as a general restraint of sustainable growth to those hinterlands not specifically identified. As indicated earlier, there should be a further category to the three identified, The Urban Areas, Rural Service Centres and Service Villages. The fourth would be called ‘Village Clusters’ enabling small-scale windfall development (3-6 dwellings depending on its location/context/parish) adjacent a recognisable group of dwellings. This would still need to ensure that village / hamlet identity remains distinct. This is achievable, and by way of an example, we are specifically promoting a small residential scheme in Hamstead Marshall through the HELAA. This can follow the established settlement pattern of ribbon development along the road frontage and still retains Hamstead Marshall as two distinct areas of established housing (rather than one consolidated village).</p> <p>A sustainable form of growth can help to ensure the local primary school is kept open, the local public house is viable (which often provides other services to the community) and the nearest village shop is still profitable as new families move into these areas.</p> <p>The supporting text states that:  <i>“Settlements outside of the settlement hierarchy will deliver additional development but this will be limited to infill or minor development within the settlement where a settlement boundary has been defined, and to rural exception schemes for affordable housing to meet local needs. Some limited development is important for the long-term sustainability of rural communities. Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in this Plan.”</i></p>	<p>Comments noted.</p> <p>The Review of Settlement Hierarchy Topic Paper assessed the current settlement hierarchy. The settlement hierarchy for the Core Strategy and Housing Site Allocation DPDs did consider the options for different levels of classification which resulted in the current classifications, included in the Topic Paper. The Council saw no reason to re-visit that conclusion.</p> <p>Consequently, no amendments to Policy SP3 are required.</p> <p>Policy SP18 deals with housing mix and type with DC1 with DC16 and 27 dealing with development in the countryside, rural exceptions</p>



Respondent	Response	Council Response
	<p>Using the suggested forth category, some of this supportive text should be incorporated into the body of the main policy SP3.</p> <p>In line with the NPPF, market housing can be a catalyst for some affordable housing to be delivered in rural communities which again should be noted. Some market housing could facilitate the provision of affordable housing to meet local needs.</p> <p>To truly deliver a range of site sizes for residential development this policy is too restrictive. The NPPF recognises the important contribution that several small allocations have to the benefit of supporting small-scale builders, providing a choice for the market and delivery of housing in popular locations. It can also increase housing supply when compared to larger scale strategic sites, which are often complex and takes significant time to deliver.</p> <p>This is crucial to meet local needs and maintain vibrant and balanced communities, whilst still preserving their own sense of identity and protecting the environment.</p> <p>A way to achieve this would be to allow small-scale windfall housing developments in the parish. The site would need to be adjacent a settlement boundary or adjacent to a recognisable group of dwellings which do not have a settlement boundary, respect the character of the settlement and landscape, have a safe highway access and some flexibility applied to access to services due to very limited scale of development supported by the suggested policy. This would assist the long-term vitality and vibrancy of the wider village, given the interrelationships that they often have.</p> <p>Reliance on Neighbourhood Plans to deliver smaller sites is a burden to more dispersed areas and parishes given the limited resources and time / commitment required to deliver them. This should be facilitated at the strategic level, subject to clearly set-out criteria. This is more important in West Berkshire given it is characterised predominantly by rural areas.</p>	<p>housing and rural workers housing. It is considered that there is enough breadth in the LPR to account for such rural needs. No amendment to Policy SP3 is required.</p>
Savills for Englefield Estate (lpr1526)	<p>The overall settlement hierarchy, set out in draft LPR Policy SP3, also reflects the adopted Core Strategy. This includes continued identification of Burghfield Common, Mortimer and Theale as Rural Service Centres in the second tier of the hierarchy, which is supported. Each of these settlements scored consistently highly in the various stages of the settlement assessment (section 6 of the Settlement Hierarchy Review Topic Paper (November 2020)) and therefore this categorisation is justified and is supported. Table 1 of the LPR describes and emphasises the importance of Rural Service Centres as, Settlements with a good range of key services and opportunities for employment, community and education. They serve a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations. To inform the settlement hierarchy, it is noted that the settlement assessment considers only the settlements previously identified in the Core Strategy and Housing Site Allocations DPD (HSA DPD) and does not consider other smaller settlements (paragraph 4.2, Settlement Hierarchy Review Topic Paper (November 2020)). However, it is also understood that the Council is currently reviewing settlement boundaries across the district, including consideration of settlements that do</p>	<p>Comments noted.</p> <p>Englefield has been considered to fall outside the settlement hierarchy. This is consistent with the response to the 2018 consultation that has been referred to. Then, it was indicated that 'Englefield has been considered within the Settlement Boundary review which concluded that a boundary would not be appropriate.' Consequently, no amendments to Policy SP3 are required.</p>

Respondent	Response	Council Response
	<p>not currently have settlement boundaries (LPR Appendix 3). As set out in our representations to the second Regulation 18 consultation in December 2018, Englefield village has a range of local community services and facilities including St Marks Church, Englefield C of E Primary School, Englefield Stores and Tea Room, Englefield Garden Centre, market garden, social club and childrens nursery and local employment provision. Indeed the size of the village and its level of services and facilities exceeds that of other villages within the district with a settlement boundary. For this reason it is important to include Englefield within the Settlement Hierarchy Review. To do so would be consistent with the NPPFs encouragement for local authorities to promote sustainable development in rural areas and identify opportunities for villages for villages to grow and thrive (paragraph 78). In line with this, and given the level of services and facilities within the village, it is appropriate for a settlement boundary to be identified at Englefield to facilitate sustainable development. Whilst the settlement hierarchy helps to inform the appropriate location of development, in order to account for changes to local services and facilities, it is important that the suitability of individual settlements to accommodate development is kept under constant review and that the hierarchy is not applied rigidly.</p>	
<p>Savills for Newbury and District Agricultural Society ((lpr2044)</p>	<p>Policy is supported.</p> <p><i>(Part of wider representation, in relation to Newbury Showground)</i>  NADAS supports the identification of Newbury and Thatcham as two of three urban areas which will be the prime focus for housing and economic development to meet local needs. Our client recognises the importance of retaining Newbury’s traditional market town heritage (as set out in draft Policy SP1) and the retention of the individual identity of adjoining settlements as required by draft Policy SP3.  The development of the Land at Newbury Showground as a logistics hub is intended to respond to regional and national market need which is of a scale and nature that would not be appropriate to be met by sites adjacent to West Berkshire’s urban areas. The Showground site provides a balance of excellent links to the motorway network to limit HGV movements on the local road network, but also sufficient proximity to Newbury and surrounding settlements to develop an effective Green Travel Plan so that the workforce would have sustainable travel opportunities.</p>	<p>Support noted.</p> <p>Agreement that Newbury and Thatcham are correctly categorised as urban areas is noted.</p> <p>Points relating to land at Newbury Showground are not relevant to SP3. The proposed allocation of sites has been the result of the rigorous assessment through the HELAA and site selection process. No changes to Policy SP3 are required.</p>
<p>Solva Planning for Emily West (lpr1423)</p>	<p>Policy supported. No further comments.</p>	<p>Noted. No amendments to Policy SP3 are required.</p>
<p>Southern Planning Practice for The Saunders Family</p>	<p>Policy SP3 builds on the spatial strategy set out in Policy SP1. We support the Council’s approach to new development and emphasise that in addition to focusing growth in the key urban areas, the</p>	<p>Support noted.</p>

Respondent	Response	Council Response
(lpr1924)	<p>Council should also look to a range of settlements which can accommodate sustainable, proportional growth.</p> <p>Newbury is a highly sustainable settlement with a range of facilities and services together with excellent transport links. It is therefore capable of accommodating a significant amount of housing over the plan period. Whilst Policy SP3 sets out that the urban areas will be the prime focus for growth over the plan period and some sites have been allocated in and around the town, we believe that further sites need to come forward to provide a larger population to support the longevity of the town centre and Newbury's facilities and services. The allocation of land east of Stoney Lane would contribute a noteworthy population which would provide additional footfall and a valuable contribution to Newbury's facilities and services.</p>	<p>The proposed allocation of sites has been the result of the rigorous assessment through the HELAA and site selection process.</p> <p>No changes to Policy SP3 are required.</p>
Sovereign Housing Association (lpr 2186)	<p>Regarding these specific representations as they relate to the emerging allocation at Kintbury, both the landowners and Sovereign support policy SP3 and the identification of Kintbury as a service village and one that is capable of supporting growth. We would add that the village also benefits from a main line train station, which sits on the Taunton to Reading line, with direct links to the south west and wider south east. Moreover, the St Mary's Primary School is very well respected and indeed received a Good rating from its most recent Ofsted report, whilst the Kintbury Surgery received a Good rating as part of its most recent CQC inspection. The village is therefore very sustainable, having a good range of quality services, as well as good infrastructure links with the wider District and beyond. Furthermore, as part of our comments regarding the school, we are aware that the school appears to be operating under capacity with regards new intakes. There is therefore a need for the village to take more growth, not only because the existing services have capacity, but because it is going to make these valuable services more sustainable.</p>	<p>Comments noted.</p> <p>Comments are not proposing any change to the policy per se but seeking an increase in the housing allocation for Kintbury. Kintbury has been assessed in the Settlement Hierarchy as a 'service village', having taken into account existing services in accordance with the agreed settlement hierarchy methodology that was subject to consultation in 2018. The settlement hierarchy methodology and the subsequent designation for Kintbury is not proposed to be changed. As a result no changes to Policy SP3 are required.</p>
Turley Associates for A2 Dominion Housing Ltd (lpr1496)	<p><i>Part of full representations made by Turley on behalf of A2Dominion in relation to Land East of Reading Road, Streatley.</i></p> <p>A2Dominion do not support the proposed recognition of Streatley as a smaller village given the presence of services and facilities available both in Streatley and Goring. Notwithstanding this, South Oxfordshire District Council has consistently identified Goring as a Larger Village in their recently adopted Local Plan (December 2020). This has resulted in two settlements, very close together, having a different standing in terms of policy when in reality they have a functional</p>	<p>Comments noted.</p> <p>This same point was addressed in response to the 2018 consultation on the settlement hierarchy.</p>

Respondent	Response	Council Response
	<p>relationship. The Council Review of Settlement Hierarchy Topic Paper (November 2020) identifies Streatley as a Service Village stating Streatley scores 21 in the settlement hierarchy matrix, comfortably within the range for consideration as a Service Village with 4 key services and facilities in the form of post office and convenience store (in Goring), primary school and village hall. However, Appendix 5 of the report discusses the Council’s decision to identify Streatley as a smaller village, contrary to the score the village received during the audit. Appendix 5 concludes that without the benefit of the post office, train station and convenience store in Goring, Streatley’s overall score would reduce to 12, the post office would no longer be counted as a key service and facility and quality of access to public transport would drop significantly. If discounted, then Streatley could not be justified as a service village in the settlement hierarchy. In our submission, the Review of Settlement Hierarchy Topic Paper (November 2020) rightly acknowledges the relationship between the two settlements, but then discounts this (wrongly) so as to reduce the sustainability of the area. Furthermore, A2Dominion note that there has been very little recent growth in Streatley with a lack of residential schemes coming forward to support the supply of affordable housing in an area that is historically unaffordable. It is highly likely that the Council’s classification of Streatley as a smaller village has limited such opportunities for growth and the delivery of affordable housing. In order to support local needs and maintain vibrancy and support of services, we suggest the Local Plan acknowledges the initial audit score that would classify Streatley as a Service Village in order to allow for sustainable growth in the village. In doing so, that also ensures that the Local Plan reflects the evidence base regarding the sustainability of the settlement having regard to its functional relationship with Goring.</p> <p>We suggest the Local Plan acknowledges the initial audit score that would classify Streatley as a Service Village in order to allow for sustainable growth in the village. In doing so, that also ensures that the Local Plan reflects the evidence base regarding the sustainability of the settlement having regard to its functional relationship with Goring.</p>	<p>There has been no material change regarding access to services and facilities since the Planning Inspector of the Core Strategy 2006-2012 concluded that, “given the separation of these 2 settlements by the Thames and the single bridge linking them over the river, Goring does not justify any particular role in the settlement hierarchy of West Berkshire”.</p> <p>Consequently, no amendments to Policy SP3 are required.</p>
Turley for Richborough Estates Ltd (lpr2383)	<p>Similarly to the comment above (<i>on Policy SP1</i>), Policy SP3 should include reference to large settlements that cross the Council administrative boundary within the settlement hierarchy as these areas are considered to be sustainable locations for development.</p> <p>It is acknowledged that the whole of Tadley is not within the West Berkshire administrative boundary, with the majority of the town located within Basingstoke and Dene Borough Council, however, local residents within Tadley look towards facilities and services within West Berkshire, and vice versa. The division of Tadley across these two administrative boundaries does not limit the use of the town to those in the relevant administrative areas. As such the straddling settlements across West Berkshire should not be made exempt from the settlement hierarchy as the locations provide the same offers and benefits as the settlements listed in Policy SP3.</p>	<p>Comments noted.</p> <p>Disagree that Tadley should be included in the settlement hierarchy as it falls outside the administrative boundary of West Berkshire. Any similar cross boundary issues are addressed under the Duty to Co-operate. Furthermore, the East of the district is heavily constrained by the two AWE establishments</p>

Respondent	Response	Council Response
	<p>It is suggested that Tadley is included within the list of 'Urban Areas' in the wording of Policy SP3 to take into account the importance and sustainability of the settlement.</p>	<p>It is not considered appropriate to amend the methodology at this stage given the two previous consultations on settlement hierarchy, where similar objections were dismissed and therefore no amendments to Policy SP3 are required. (See West Berkshire Local Plan Review to 2036 - Consultation Statement (October 2018).)</p>
<p>Wey Planning for Neville Baker Estate (lpr1278)</p>	<p>1. We agree with the District Settlement Hierarchy set out in Policy SP3 and the identification of Hermitage as a Service Village. However, based on the analysis set out in the Settlement Hierarchy Topic Paper and appendices, it is apparent that the score ascribed to Hermitage does not take into account a number of services and facilities within or very closely related to the settlement and so understates its role and function.</p> <p>2. Our assessment of services and facilities within or very closely related to Hermitage identifies that the following have not been included in the settlement audit for Hermitage in Appendix 2 of the Topic Paper: a) The Co-Op store on Newbury Road which is nearing completion and will soon be in operation. According to the relevant planning permission (19/00029/FULD), the store has a net trading area of 325 square metres and according to Appendix 1 of the Topic Paper, this qualifies it as a supermarket = 3 extra points. b) Hermitage Village Hall provides opportunities for indoor sport and leisure (the website refers to keep-fit, dance, ballet, wine and horticultural society events etc) = 1 extra point. c) The multi-use games area (MUGA) adjacent to the Village Hall provides opportunities for outdoor sport and recreation = 1 extra point.</p> <p>3. In addition, it is noted from Appendix 2 that services and facilities located within a 1km radius (2Km diameter) of the centre of settlements are to be included in the individual settlement audits, whilst those lying outside are to be automatically excluded. We consider this approach to be an unduly rigid and arbitrary way of establishing the relatedness of a service or facility to a particular settlement and believe that it necessary to apply common sense judgement in such situations.</p>	<p>Comments noted. However, the Council does not agree that Hermitage has been incorrectly assessed within the hierarchy.</p> <p>It is disagreed that scoring (and subsequent implications for a settlement within the hierarchy) can be done retrospectively on the grant of a planning permission. This would introduce inconsistencies within the methodology. Services and facilities need to be existing.</p> <p>The classes that are held in a village hall do not count towards the scoring. The scoring for the village hall is as a facility for communal use and it would be disproportionate to ascribe a score for every possible use to which it could be put whilst making no difference to the hierarchy. Services and facilities</p>

Respondent	Response	Council Response
	<p>4. In the case of Hermitage, there are two services/ facilities which lie just outside the 1km radius/2km diameter of the catchment area, as measured from the centre of the settlement. However, because of the size and extended linear form of Hermitage, these services/facilities are located very close to the village and are within very easy walking distance for much of the village population. Furthermore, they are considerably closer to Hermitage than to Curridge (under which they are listed in Appendix 2) and in recognition of this, they both have a Hermitage postal address. Therefore, we consider that they should quite properly be included in the Hermitage settlement audit. These services/facilities are as follows: a) The Costcutter convenience store, Faircross, Hermitage (Denison Barracks) = 1 extra point. b) New Community Centre, Faircross, Hermitage (Denison Barracks) = 1 extra point. 4. Appendix 3 to the Topic Paper is an audit matrix which provides an overall score for each settlement and ranks the settlements based on their overall score. It currently shows that Hermitage is ranked in 4th place among the Service Villages in the District, with a total score of 24 points (behind Compton, Kintbury and Chieveley). However, if the services and facilities identified above are included in the settlement audit/audit matrix, the total score for Hermitage increases to 30 points, which puts it in 2nd place, behind Compton.</p> <p>5. Accordingly, we consider that the settlement hierarchy review process undertaken to inform the WBLPR understates the role and function of Hermitage. We request that this is corrected in the following ways: a) Including the services and facilities identified above in the settlement audit for Hermitage in Appendix 2 of the Topic Paper and the settlement audit matrix in Appendix 3. b) Amending the Service Villages section of Table 6 of the Settlement Hierarchy Review Topic Paper, which lists the settlements in descending order according to their score, to ensure that Hermitage is correctly ranked.</p> <p>The Settlement Hierarchy Review Topic Paper and Appendices 2 and 3 should be amended as detailed above, to ensure that the role and function of Hermitage in terms of services and facilities is fully recognised.</p>	<p>were assigned scores according to their principal/formal purpose. To classify a village hall as an indoor sport and leisure centre is not considered to be an accurate interpretation of the criteria in Appendix 1. The children's play area was given 1 point. MUGAs are not assessed within the methodology - only sports/playing grounds are included.</p> <p>This approach was included in the original methodology. The use of the 1km radius is ensure a consistency treatment of all settlements. It was considered a maximum across the range of services and facilities and proportionate for the purposes of reviewing the hierarchy.</p> <p>Hermitage has been consistently assessed within the methodology and no further changes to the methodology are proposed.</p> <p>The hierarchy concludes no further ranking between the Service Villages once the qualitative assessments had been completed in Appendix 5. [On revised scoring there is no further assessment needed for Hermitage.] No amendments to Policy SP3 are therefore required.</p>

Respondent	Response	Council Response
<p>Wey Planning for Neville Baker Estate (lpr1277)</p>	<p>Policy not supported.</p> <p>1. Policy SP3 Settlement Hierarchy states that the scale of development proposals will be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility. However, it does not acknowledge that the scale of development proposals at individual settlement level is also determined by the suitability and development potential of available sites. This omission is not consistent with PPG Paragraph 101 Reference ID: 41-101-20190509, Paragraph 4.33 of the supporting text, Paragraph 2.5 of the Settlement Hierarchy Topic Paper or Policy SP1 Spatial Strategy, which states that Allocations will be related to the role and function of settlements and the development opportunities identified through the HELAA . Policy SP3 should be amended accordingly.</p> <p>2. Policy SP1 makes it clear that the reference to allocations includes reference to non-strategic sites allocated in the WBLPR as well as those to be allocated in Neighbourhood Plans in order to (at least) meet the housing requirements for the designated Neighbourhood Areas identified in the WBLPR. It must follow that for the housing requirements set in the WBLPR for the designated Neighbourhood Areas to be justified and based on clear evidence, the setting of housing requirements must take account of the suitability and development capacity of available sites identified through the HELAA.</p> <p>3. Ascribing a housing requirement for a designated Neighbourhood Area without having regard to the suitability and development capacity of available sites is both arbitrary and unrealistic because it could result in a situation (as with Hermitage) where the housing requirement does not reflect the suitability and development capacity of available sites. An unintended and unacceptable outcome of this approach would be that the housing requirement is not realistic or achievable and so cannot be complied with or can only be complied with in a sub-optimal way. For example, it could lead to a situation where either there is no suitable site(s) with the required capacity, the development of a suitable site is not effective, or a site is allocated which is clearly less suitable than an alternative. As a consequence, the NDP could be found unsound.</p> <p>4. Failure to have proper regard to the suitability and development capacity of available sites is particularly concerning in relation to the housing requirements proposed for designated Neighbourhood Areas in the AONB under Policy SP15. In this case, most of the potential housing sites in the AONB identified in the HELAA are regarded as potentially developable because their suitability is unknown, pending further assessment of landscape impact in order to confirm the potential for sites to be developed without causing harm the natural beauty and special qualities of the AONB. Furthermore, in some cases, the development capacity of these sites can only be established by undertaking this work.</p> <p>5. Having regard to Paragraph 172 of the NPPF and the primacy given to the conservation and enhancement of the natural beauty of the AONB by Policy SP2, such further landscape</p>	<p>Comments noted.</p> <p>The availability of suitable development opportunities is implicit in the relevant policies in the LPR. Site allocations have come through the HELAA.</p> <p>The settlement hierarchy methodology is based on that contained in the Core Strategy and Housing Site Allocation DPDs and has been through vigorous consultation in 2018, 2019 prior to R18. Policy SP3 seeks to steer the scale of development in proportion to the role and function of the relevant settlement. The council does not consider any change in the policy wording is necessary.</p> <p>These following points are not an issue for Policy SP3. See response to SP15 given the references to Hermitage.</p> <p>The purpose of the policy is direct development to the most sustainable locations in accordance with the settlement hierarchy. Within these settlements, policy SP13-15 identify the sites that are considered suitable in relation to the hierarchy taking into account the assessment of sites carried out through the</p>

Respondent	Response	Council Response
	<p>assessment must be regarded as a necessary and proportionate precursor to setting the housing requirements for the designated Neighbourhood Areas in the AONB. However, this further landscape assessment work has not been undertaken by the Council and so the housing requirements for the designated Neighbourhood Areas set out in Policy SP15 are not justified.</p> <p>6. Identical concerns were expressed by the Core Strategy Inspector in relation to the Councils previous approach to assessing the scale of development to be accommodated in the various identified settlements in the AONB. At Paragraph 75 of his Report, it states that whilst the Landscape Sensitivity Assessment 2011 gave some support to the Councils view that the scale of development proposed in the AONB can be achieved whilst preserving and enhancing the landscape, achieving this policy objective will depend upon the intrinsic qualities of individual sites; the scale, density and design of new buildings; the integration of development with the existing built form and the wider countryside; and any cumulative impact with other planned development. He concluded at Paragraph 79 that Given the landscape led approach that has to be taken, there is not sufficient evidence to ascribe specific housing figures for the different settlements in the AONB.</p> <p>7. Therefore, it is clear that to meet the NPPF tests of soundness, the WBLPR housing requirements for the designated Neighbourhood Areas within the AONB set out in Policy SP15 must be based on further assessment of the landscape capacity of individual sites identified in the HELAA to establish an appropriate figure for each designated Neighbourhood Area.</p> <p>8. In anticipation of this work being undertaken, the Neville Baker Estate has commissioned a Landscape Capacity Assessment of the HER4 Land adjacent to Station Road, Hermitage site and have submitted it to the Council under cover. (Document attached to representation ) The Landscape Capacity Assessment provides a rigorous and up-to-date assessment of the capacity of the HER4 site to accommodate 55-60 dwellings without harm to the natural beauty and special qualities of the AONB and takes express account of the matters identified in Paragraph 75 of the CS Inspectors Report.</p> <p>We consider that the first paragraph of Policy SP3 should be amended to ensure that the scale of development will be related to the suitability and development capacity of available sites, as well as the existing or proposed level of services and facilities in the settlement, together with their accessibility.</p> <p>Having made this change, it is essential that the housing requirements for the designated Neighbourhood Areas in the AONB under Policy SP15 are re-assessed, to take account of the suitability and development capacity of available sites. This is to ensure that the individual housing requirements are realistic and achievable, and will result in the allocation of suitable housing sites in the NDP and the efficient use of land.</p>	HEELA. No changes to Policy SP3 are required.
Woolf Bond Planning for JPP Land &	Policy not supported.	Comments noted.



Respondent	Response	Council Response
Spitfire Bespoke Properties (lpr2318)	<p>Within the Settlement Hierarchy Background Paper accompanying the consultation the authority details the criteria and assessment which has resulted in the conclusions it suggests are valid. Although the assessment has been refined from that within Appendix B of the November 2018 Regulation 18 consultation document i.e. with respect of how the distances from specific facilities were derived, we nevertheless have concerns regarding the current appraisal. This includes unjustified conclusions over availability of services. This is illustrated by the information in appendix 3 with suggests Supermarkets are available in both Theale and Lambourne. However, a review of the stores in these villages confirms that the floor areas are less than 250m2 and consequently would only be categorized as convenience stores within the assessment process.</p> <p>Furthermore, although it is recognized that Lambourn has extensive racehorse industry nearby, no evidence has been provided that more than 100 business are registered in this employment segment to qualify as a significant employment opportunity in the parish (as suggested by the draft audit for Lambourn (page 38) in appendix 2 of the Settlement Hierarchy Topic Paper).</p> <p>Additionally, although appendix 3 of the Topic Paper acknowledges that Burghfield Common has access to significant employment opportunities, the village of Burghfield which is within the same parish has not been categorized consistently.</p> <p>Both settlements have ready access to the significant employment opportunities at AWE Burghfield and should therefore be classified accordingly.</p> <p>The above is purely an indication of how the current assessment does not reflect the approach envisaged by the authority. Nevertheless, if these changes were made, the scorings of Burghfield, Theale and Lambourn would be revised as follows:</p> <p>[See Table on page 5 of attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED']</p> <p>As a result of this, the classification of Lambourn as a Rural Service Centre would be incorrect and reflecting the approach in the Settlement Hierarchy Topic Paper it would instead be a Service Village.</p> <p>The Topic Paper (page 18) indicates that through the Council's assessment, the village of Burghfield would be categorized as a service village. This however is not repeated in the draft Plan due to the flawed assessment in appendix 5 This is a flawed assessment since it does not adhere to the advice in the NPPF (paragraph 78) especially given its proximity to the wider services in Burghfield Common together with its proximity to the extensive employment opportunities at AWE Burghfield.</p> <p>[Preferred approach]</p> <p>We would therefore advocate the reclassification of Burghfield village as a Service Village.</p>	<p>The floor area for the supermarkets are as follows: Theale – 285+sqm Lambourn – Co-op 286+sqm and so the Council does not consider they have been incorrectly classified.</p> <p>The ONS 'UK Business Counts' indicates 440 businesses in the Lambourn Super Output Area.</p> <p>Whilst part of Burghfield Village falls within a 2km buffer of Burghfield Common, AWE Burghfield only falls within the 2km buffer zone for Burghfield Village. This was taken into account for Burghfield Village when looking at the criteria for employment opportunities. Burghfield Village was found not to meet this criterion.</p> <p>In light of the above, no amendments to the scoring or settlement hierarchy is changed and no amendments to the settlement hierarchy or Policy SP3 are proposed.</p> <p>Notwithstanding how Burghfield village is defined within the settlement hierarchy, the inclusion of a site is not a matter to be considered under Policy SP3. Sites</p>

<b>Respondent</b>	<b>Response</b>	<b>Council Response</b>
	<p>Our clients site as previously advised is close to the village of Burghfield which has a range of facilities which make the settlement sustainable, including primary school, pubs, church and hall. The site is also accessible to the further facilities in Burghfield Common. The Council's determination of a planning application also confirmed that the site (and Settlement) represents a sustainable location. This was endorsed in the appeal decision (paragraph 52).</p>	<p>have been assessed through the HEELA No amendments to Policy SP3 are required.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP4 Atomic Weapons Establishment (AWE) Aldermaston and AWE Burghfield

### (Proposed Submission LPR Policy: SP4 Atomic Weapons Establishment (AWE) Aldermaston and AWE Burghfield)

Number of responses received: 21

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Aldermaston Parish Council (lpr1053)	Automatic Refusal should not be inevitable for small developments (eg less than 5 dwellings). It would be useful to see some comment as to how the number of additional employees and business clients that would come to the area during working hours would not have an adverse impact on the off-site emergency plan.	Comments noted.  However this is very much related to the Off-Site Plan and capabilities for both residential and commercial proposals
Hungerford Town Council (lpr126)	No comments recorded	Response noted
Newbury Town Council (lpr2269)	Acknowledge the constraint put on development and the knock on effect for Newbury and Thatcham	Response noted
Shaw-cum-Donnington Parish Council (lpr198)	We do not feel competent to comment	Response noted
Stratfield Mortimer Parish Council (lpr393)	Concern that it is not practical to express the ONRs likely advice, or the Council's response, to a range of scenarios covering likely possible futures making the plan worthless for this area.	Response noted
Thatcham Town Council (lpr1391)	Note that the Thatcham NE plan falls within the AWE outer zone, exceeds 200 dwellings, and that it is also located on a section of road prone to congestion.	Comments noted Thatcham does not fall within the AWE A Outer Consultation Zone (development management

	<p>Request that an accurate traffic flow assessment that reflects current level of congestion is used prior to consulting with the ONR on the viability of the proposed NE Thatcham site.</p> <p>Consideration is also given to the use of the A4 as a primary diversion route for the M4 when there are closures.</p> <p>Newbury Town Council Given that there is no evidence to indicate that this consultation with the ONR has commenced, it is necessary for West Berkshire Council to put forward alternative sites for the second phase of Draft Local Plan should future discussions with ONR restrict development.</p>	<p>purposes) but within the Outer Planning Zone (emergency planning purposes)</p>
Hart District Council (lpr50)	<p>It is noted that the outer consultation zone 5km buffer for AWE Burghfield comes close to the Hart boundary in the north of the District, but remains outside Hart. We would wish to be notified if there were any further changes to this in the future.</p>	<p>Comments noted</p> <p>Hart DC comes into the Outer Planning Zone for emergency planning (12km) and not the Outer Consultation Zone for development management purposes (5km)</p>
Environment Agency (lpr1658)	<p>The policy should add that Environmental Permitting Regulations 2016 (EPR) apply. Both sites generate radioactive wastes and the minimisation and disposal of these wastes is regulated under EPR permits.</p> <p>The regulator for EPR is the Environment Agency.</p>	<p>Comments noted and changes made</p>
<b>General consultation bodies</b>		
Office for Nuclear Regulation (ONR) (lpr1966)	<p>Please note that ONRs land use planning processes may apply to some of the developments within the West Berkshire Local Plan Review to 2037. If you are a Local Authority with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require: confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and that the developments do not pose an external hazard to the site.</p> <p>Additional comments received 18th Feb 2021 - Since ONRs initial response to the emerging draft of the West Berkshire Local Plan Review to 2037 (attached) I have been made aware of an error within the draft plan ( Local Plan Review 2020 -2037: Emerging Draft (westberks.gov.uk) ). The plan includes an incorrect reference to ONR-LUP-NS-001 "Land Use Planning and the Siting of Nuclear Installations. The AWE sites centre points are not included in this document.</p> <p>The centre points are not yet published on the ONR Land Use Planning Website ONR - Land use planning , but will be Please note also, as per my letter of 24 April 2020 to Local Planning Authorities (attached), the Outer Consultation Zone (OCZ) for AWE Aldermaston will soon be amended from 8km to 5km.</p>	<p>Comments noted and changes made</p>

	Could you please update your Local Plan accordingly to remove reference to ONR-LUP-NS-001 Land Use Planning and the Siting of Nuclear Installations and also to include the OCZ for AWE Aldermaston as 5km.	
Sovereign Housing Association Ltd (lpr2159)	It is noted policy SP 4 seeks to revise the Emergency Planning Zone surrounding the two AWE sites located within WBDC. We understand this is following the advice of the ONR. Whilst we recognise the need for a robust emergency plan we urge the council to consider, where appropriate, to support the delivery of essential local affordable housing of a modest scale where it can be delivered in line with and support the local REPPiR.	Comments noted
<b>Other stakeholders</b>		
Tim Hall (lpr641)	Supports the policy	Support noted
Peter Norman (lpr1021)	It is noted in the supporting notes to SP4 that extensive quotes are taken from the NPPF to support the policy that helps enshrine the NPPF in the policy - this has not been done with the three preceding SPs and relevant sections of the NPPF should be quoted to support all the stated policies	Comments noted
Nataliya Topliss (lpr796)	If it is not possible to develop near AWE this does not mean that all developments have now to take place in Thatcham. The developments need to be spread evenly though the county to ensure that that there is no significant harm to a single town's infrastructure	Comment does not relate back to SP4
Councillor Tony Vickers (lpr529)	Note that a judicial review (JR) is likely to challenge the position this Council has taken to rule out any housing development in the DEPZs. .	Comment noted.
West Berkshire Green Party (lpr1827)	We broadly support this policy, while regretting the inevitable serious problems that are arising from locating the manufacture of the UK's weapons of mass destruction in the middle of West Berkshire.	Comments noted.
<b>Landowners, site promoters and developers</b>		
AWE (lpr2292)	Disagree in part. The draft policies do not go far enough. Express policy support is required for development at AWE A and AWE B, taking forward the proposals for a bespoke policy designation for these sites in current Core Strategy Policy CS9 (b). Executive Summary The Local Plan should provide direct policy support for development at AWE A and AWE B. This is required to allow AWE efficiently to develop, modernise, rationalise and consolidate its estate footprints in accordance with the Governments investment programme, which responds to the Government's policy commitment to a nuclear deterrent for the UK.	Comments noted.  Due to the unique nature of the employment at AWE, the Council is not able to assign it Designated Employment Area.  However, the Council is aware of the unique status of this significant employer and is proposing a separate policy to support the

	<p>Without such a policy, the Local Plan is unsound, does not reflect the requirements of Local Plan CS Policy CS9(b) and/or the NPPF  The Radiation (Emergency Preparedness and Public Information) Regulations 2019 has introduced the "Outline Planning Zone (OPZ)". We would therefore recommend that this term is used in the Local Plan in lieu of OCZ.  Policy SP4 does not recognise or support AWE's known land use and development needs at AWE A or AWE B. Function of Policy SP21 (Sites allocated for economic development Policy SP21 designates certain additional areas as Designated Employment Areas (DEAs), renaming and expanding upon the existing designated areas in the Local Plan, currently known as Protected Employment Areas (PEAs).  Policy SP21 should be interpreted and applied alongside Policy DC 31 (DEAs), which explains how planning permissions should be determined in DEAs.  Need for bespoke designation AWE A and AWE B have not been designated as PEAs (or now, DEAs), nor - in AWE's view - should be.  However, the Local Plan Review process should put forward an "alternative bespoke designation", in recognition of the sites' importance to the local economy and to national security, and to make the Local Plan consistent with Policy CS9(b) and, in any event, NPPF paragraphs 95 (b) (supporting development required for operational defence and security purposes) and 182 (reducing restrictions on existing businesses and facilities / agent of change).</p>	<p>development of AWE A and AWE B, reference DM33.   The term OCZ is one provided by ONR in relation to development management purposes and OPZ in REPPIR for emergency planning purposes.</p>
<p>Charlesgate Homes Limited  (lpr2340)</p>	<p>Are you able to advise if it is the likely intentions to blanket ban housing with the DPEZ at both Burghfield and Aldermaston?  Are you able to advise what evidence based has been used to change Policy CS8 from the current tiered system?  It is my belief that all polices are formed on the basis of evidence based information, but I am unable to find this within the proposed local plan evidence.  Have the WBC emergency planning team objected to SUL1, or just the Grazeley Green Garden village?  Have the ONR objected to SUL1 or just the Grazeley Green Garden Village?  Is there new documentation/ regulation outside of the RIPPIR 19 and Burghfield AWE consequences report that state no new houses can be build in the DPEZ zone, not matter how far away they are?  Why is the tier system being dropped, has these been deemed unsound at a recent appeal decsion or have the ONR objected to it?  As a resident that now lives within the DPEZ zone (was outside it before) should I be concerned that no more people are allowed to live in the DPEZ zone and is there something going on at AWE that impact us health wise?  If there is added risks will the residents within the DPEZ zone be made aware of this?</p>	<p>Comments noted.   The tier system is being dropped on the advice of ONR.</p>

	When Will the updated DPEZ report likely be published?	
<p>John Cornwall on behalf of Messrs I. Cheshire, R. Shaw and The Russell Trust (lpr1649)</p>	<p>Burghfield Common is a Rural Service Centre The village is relatively close to the Atomic Weapons Establishment ROF Burghfield, which lies to the north and east of the settlement. The Office for Nuclear Regulation (ONR) applies safety zones around such sensitive establishments (the other in the area is at Aldermaston) within which the relevant local authorities are required to prepare an Off-Site Emergency Plan.</p> <p>At either of these locations the reasoning behind the ONRs decision in May 2020 to extend the zones is vague and unclear, and justified by factors which do not appear to be appropriate.</p> <p>The proposed DEPZ extension at AWE Burghfield is therefore objected to. It will effectively prevent the local planning authority from allocating housing sites in the Burghfield Common area, which is now effectively wholly covered by the extended DEPZ, thus frustrating one of the policy objectives of this Consultation Document. Objection is also raised to the wording of Proposed Policy SP4. The opening sentence states that: In the interests of public safety, residential development in the Detailed Emergency Planning Zones (DEPZ) of AWE Aldermaston and Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation has advised against that development. The original 1.5 kilometres radius zone covered an area that is almost entirely rural and countryside. in planning policy terms, where there was a presumption against development in any case. The implications of the ONR approach to the issue was therefore probably not fully appreciated by West Berkshire Local Planning Authority. However, its impact will now become very apparent because of the reasons set out above in relation to Burghfield Common.</p> <p>I proposed a re-wording of their Policy SS7 along lines which are both appropriate and relevant to the emerging West Berkshire situation.</p>	<p>Comments noted.</p> <p>The zones identified in May 2020 have been subject to a Judicial Review, which found in favour of the Council.</p> <p>The proposed rewording does not align with national guidance and is therefore not proposed.</p>
<p>Green Park Reading (lpr2032)</p>	<p>GPR understands the reasons for limiting residential development within the Burghfield Atomic Weapons Detailed Emergency Planning Zone.</p> <p>GPR also understands the need to consult the ONR for non-residential planning applications within the DEPZ. However, it is unlikely that non-residential development would have a significant impact on the off-site emergency plan for the Burghfield Atomic Weapons Establishment.</p> <p>GPR therefore requests that clarification is added to Policy SP 4 that although the ONR will be consulted, it is unlikely this will restrict non-residential development in the DEPZ.</p>	<p>Comments noted.</p> <p>The statement non-residential development would be unlikely to have a significant impact on the off-site emergency plan cannot be substantiated and therefore changes cannot be made. Especially since under certain circumstances some employment can be changed to residential under permitted development rights.</p>

Richborough Estates Ltd(lpr2384)	It is noted that a High Court case is currently pending determination in respect of the extent of the DEPZ. This may impact whether or not the site Land North of Silchester Road, Tadley would still be located within the DEPZ, and the approach to be taken in terms of the acceptability of residential development in this locality. This High Court case is therefore considered to be of relevance to Policy SP4.	Comments noted.  The Judicial Review in the High Court of the designation of the DEPZ was found in the Council's favour.
Savills on behalf of Englefield Estate Office (lpr1527)	<p>It is important to note that the extension of the DEPZ is currently subject to Judicial Review (the outcome of which is not yet known).</p> <p>During the plan period there is likely to be changes of inputs to the ONR model which may result in, changes to the consultation zones. These will be kept under review. The potential for changes to the DEPZ is of major importance given the development potential of land currently located within the DEPZ, including for example land of strategic importance at Grazeley. We would therefore strongly support the need to maintain ongoing review throughout the plan period.</p> <p>Should the DEPZ change, this should be a trigger for a review of the LPR and reconsideration of appropriate sites for residential development, such as at the Estates land at Grazeley, Burghfield Common and Green. This should be clarified within the LPR.</p> <p>Draft LPR Policy SP4 states that residential development in the DEPZ is likely to be refused, and any new development in the DEPZ leading to an increase in population will be consulted upon with ONR; however, no specific guidance is provided regarding the likely suitability of commercial development in the DEPZ. In this regard we note recently that ONR did not object to an application for an energy recovery centre and data centre at Berrys Lane, Reading, located within the DEPZ, following review by the Councils Emergency Planners (ref. 20/02029/COMIND).</p> <p>Further clarity is needed in the LPR itself on the suitability of commercial development in the DEPZ, particularly given that the Eastern Area is identified as an important area for business development in draft LPR Policy SP1</p>	Comments noted.  The outcome of the Judicial Review was to support the position of the Council.



## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP5 Climate Change

### (Proposed Submission LPR Policy: SP5 Climate Change)

Number of responses received: 43

Respondent	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr729)	Policy supported. Pleased to see mention of the historic environment in this - but NB an understanding of the evolution of our landscape and the significance of its historic character can also be used for positive enhancement that also responds to climate change. An example of this would be tree planting where it's known that ancient woodland has been lost.	Comments noted.
West Berkshire District Council Ecologist (lpr1689)	2nd and 3 <sup>rd</sup> bullet points in policy - Add a point about low tech solutions in terms of building materials. para 5.7 ....Using water more efficiently, reducing overheating and controlling high levels of rainwater run-off <u>in upper parts of the catchments</u> are all examples of adapting a development to respond to changes in our climate...	Comments noted.  SP5 is a strategic policy and low carbon technologies and innovation is a deliberately broad term to embrace known and unknown future developments in technology. To pick out 'building materials' would take the policy to level of detail not appropriate to SP5. Similarly, controlling high levels of water run-off is applicable to a range of development circumstances and not wanting to limit the controls just in upper parts of the [river] catchment.
<b>Statutory consultees</b>		
Greenham Parish Council (lpr892)	Policy not supported.	Comments noted. Placing the burden of net carbon positive on new development to compensate for past and present excesses

Respondent	Response	Council Response
	<p>Would like to see stronger environmental policies. Councillors agree to use Question 2 text from Section 5 of the document supplied by TV <i>[assumed to be Cllr Tony Vickers]</i></p> <p>New local plans should reflect the need to go beyond carbon neutrality, in new developments, in order to meet District wide carbon neutrality by 2030.</p>	<p>in not considered equitable and as the comment suggests the achievement of carbon neutrality will be a product of many plans as part of wider strategy to address the climate emergency. Measures to increase the adoption of retro-fitting energy efficiency measures for the existing housing stock may be explored in subsequent Local Plan Documents and other government policy programs.</p>
Newbury Town Council (lpr2268)	<p>Yes we support it – but we wish to strengthen it.</p> <p>We wish to positively encourage developments whose main purpose is to combat climate change, such as renewable energy projects.</p> <p>It is not enough that development proposals aim to be themselves carbon neutral. The Local Plan must reflect what is said in the Council’s Environment Strategy: “any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented”.</p> <p>Developments should aim where possible to be carbon positive, to counterbalance the many existing developments – some still being built out – which are carbon negative. Developments that are specifically to provide renewable energy must be encouraged and supported, especially on Council owned land or when community-led to supply nearby settlements. Such developments should be considered as part of the essential infrastructure of the District and able to be part funded by CIL contributions from other developments.</p> <p>In this sentence: “All development should contribute to West Berkshire becoming and staying carbon neutral by 2030” the words “as much as possible” should be added after “contribute”.</p>	<p>Comments noted.</p> <p>The Environment Strategy is much broader in its scope than just new development notwithstanding the importance of new development being carbon neutral or better. For instance, development cannot offset carbon emissions from resident’s use of transport as a consequence of house building. However, the Local Plan Review policy does seek to develop in the most sustainable locations.</p> <p>The Council believes that this policy together with other related policies referred to within the Plan, is clear in its intent with respect to tackling climate change through sustainable development.</p> <p>Proposed Submission LPR Policy DM4 Building Sustainable Homes and Businesses addresses the requirement for renewable energy in new developments.</p> <p>The Council considers the addition of “as much as possible” would weaken the policy.</p>
Hermitage Parish Council (lpr1818)	<p>Policy supported.</p> <p>Hermitage Parish Council supports all of the aims of this policy but would like to see additions to better build sustainable communities.</p>	

Respondent	Response	Council Response
	<p>Set a baseline of standards that must be met for carbon emissions, not just from the finished home but from the entire building process.                      Aim to be at the forefront of innovation demonstrating best practice for other Local Authorities to learn from.                      As you say, much of West Berkshire is an AONB so provides an ideal opportunity to show how homes can be built without damage to the environment.                      Prioritise developers by green credentials to encourage all to meet the best standards.                      Require developers to state what the carbon emissions of a build will be, how this will be measured and when, with penalties if the original statement is not met.                      Include transport within the carbon emissions statement.                      Seek out best practice elsewhere with a view to following this so that WBC is not operating in a bubble.</p>	<p>SP5 is a strategic policy that must bring together other policies in the LPR to achieve its aims. For example, standards are set out in Proposed Submission LPR Policy DM4 (Building Sustainable Homes and Businesses) for construction and renewable energy. In others, such as Proposed Submission LPR Policy DM8 (Air quality) which will require air quality assessments.</p>
<p>Holybrook Parish Council (lpr2451)</p>	<p>Policy supported.</p>	<p>Support noted</p>
<p>Hungerford Town Council (lpr127)</p>	<p>We strongly support this policy and believe much greater urgency in implementing it is essential.</p>	<p>Comments noted and agreed.</p>
<p>Thatcham Town Council (lpr1392)</p>	<p>Policy neither supported nor not supported.</p> <p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>We agree with the importance of responding to climate change and ensuring that the Draft Local Plan aligns with the statement mission of West Berkshire Council aligned with net-zero carbon.</p> <ul style="list-style-type: none"> <li>• "All development should contribute to West Berkshire becoming and staying carbon neutral by 2030."</li> </ul> <p>It is essential that this policy is consistent and aligns with the definition of the Environment Strategy that "any carbon dioxide gas emissions within West</p>	<p>Comments noted.</p> <p>Many other policies in the LPR complement and will be applied in conjunction with the Climate Change policy which is an 'umbrella' policy. Those policies such as Proposed Submission LPR Policy DM4 (Building Sustainable Homes and Businesses for construction and renewable energy and Proposed Submission LPR Policy DM8 (Air quality) which will require air quality assessments for example, illustrate the many measures within a development that can help achieve the aims of the policy and the reason that a Sustainability Statement is required. The policy requires developments to satisfy the criteria for approval and the Sustainability Statement should</p>

Respondent	Response	Council Response
	<p>Berkshire will be balanced with an equivalent of emissions that are either offset or prevented."</p> <p>On this basis the policy requires to be strengthened. The policy has good intentions but could easily be circumvented by a developer. For example: 'development should <u>contribute</u> to becoming carbon neutral' - could imply that a cycle lane or a bus-stop contributes to and fulfils the policy.</p> <p>'To achieve the highest <u>viable</u> levels of energy efficiency' - could lead developers to claiming that a higher level is unviable leading to poorer quality houses.</p> <p>'To generate and <u>supply</u> renewable' - could lead to a developer claiming that a single solar panel of one dwelling on 2,500 houses fulfils the policy.</p> <p>It is essential that this policy is substantially strengthened, the ambition is made clear, and that statements are quantifiable.</p> <ul style="list-style-type: none"> <li>'Proposals should be accompanied by a Sustainability Statement'.</li> </ul> <p>We note that the Sustainability Appraisal report, also under consultation, does not refer to the West Berkshire Environment Strategy. Nor does it include the clear statement that "any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented." The stated issue within the Sustainability Appraisal is "reduce impacts on climate change through reduced emission of greenhouse gases". This issue in the SA is not consistent with the Environment Strategy of West Berkshire, because it does not define what level of reduced emission is considered acceptable, nor does it align with net zero.</p> <p>It is essential that the Sustainability Assessment reflects the approved motion on Net-Zero Carbon, the definition within the Environment Strategy. It is important that this policy is revised and aligned with the Environment Strategy. Similarly, so should the SA. The aspiration needs to be clear, and it will be necessary for West Berkshire to require large</p>	<p>demonstrate how this is to be achieved. Approval and any conditions attached at the planning application stage will ensure that token commitments will not succeed.</p> <p>The sustainability appraisal (SA) is a quite separate and prescribed process to the Council's Environment Strategy. The SA combines the requirements for a Strategic Environmental Assessment (SEA) of Local Development Documents in accordance with the European Directive (2001/42/EC)<sup>1</sup> which is enshrined in national law by the Planning and Compulsory Purchase Act 2004<sup>2</sup> and those requirements of the SEA Regulations (Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004)<sup>3</sup> The appraisal includes economic and social components of sustainable development as well as the environment.</p> <p>Proposed Submission LPR Policy DM4 Building Sustainable Homes and Businesses does include net zero</p> <p>The Government is in the process of consulting on a Future Homes Standard which it hopes to pass into legislation in 2024. An interim change to the Building Regulations occurred in June 2022</p>

<sup>1</sup> EU Directive on Strategic Environmental Assessment:

<http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>2</sup> Section 19 of the 2004 Planning and Compulsory Purchase Act

<http://www.legislation.gov.uk/ukpga/2004/5/section/19>

<sup>3</sup> SEA regulations 2004: <https://www.legislation.gov.uk/uksi/2004/1633/introduction/made>

Respondent	Response	Council Response
	<p>developments to conduct a carbon assessment and footprint exercise that predicts the carbon footprint of dwellings.</p> <p>If a development will lead to an excess (above) net-zero carbon we recommend that a penalty payment is made by developers to West Berkshire Council to enable it to invest in off-setting schemes which could include large scale solar, or windfarms (not necessarily on West Berkshire land). We recommend that an independent assessor is identified. We understand that a similar approach is taken by London Authority.</p> <p>We also recommend that this policy is aligned with the Building Homes Standard, recently published by central government “that local authorities will retain powers to set local energy efficiency standards for new homes” and therefore WBC should use its power to ensure it meets its own Environment Strategy objectives.</p> <p>We recommend that West Berkshire has an independent assessor or carbon footprints for major new developments. Where development exceeds net zero carbon beyond 2030 a developer should demonstrate how offsetting will be used to mitigate carbon emissions.</p> <p><b>Section 5.4</b></p> <p>"District sets a target for carbon neutrality by 2030 being achieved by reducing carbon emissions to 350kt/annum".</p> <p>It is unclear to us whether the 350kt/annum targets include the population growth to 2037. We think it does not as the Environment Policy appears to be referenced to a 2017 baseline.</p> <p>It is important that that this target is updated to reflect the growth forecasts for 2037.</p> <p><b>Section 5.6</b></p> <ul style="list-style-type: none"> <li>• Designing and constructing developments that are extremely energy efficient and/or make the best use of renewable energy technologies are both ways of helping to mitigate further climate change.</li> </ul> <p>The Thatcham NE site is SW facing and has elevated location. Such locations lend themselves to a good wind-resource (SW is the prevailing wind direction) and sites clear of woodland are fairly rare in West Berkshire. We would therefore encourage West Berkshire to conduct a survey of the</p>	

Respondent	Response	Council Response
	<p>wind and solar resource on site and to assess the level of renewable energy that can be harvested. This should be used to inform future development of the site with regards the potential for off-setting.</p> <p>We note that the Sustainability Assessment state that there is "clear evidence and justification that West Berkshire needs to do more to meet national targets in relation to CO2 emissions reduction." and that "current installed capacity is about 15% of the previously designated 2016 target". It is necessary to update the Sustainability Assessment which is now dated as the target of 2016 predates the commitments made in July 2019. Following this update, it is important to assess what is the current installed capacity relative to the new target and to understand the scale of challenge that remains.</p> <p><b>Section 5.8</b></p> <ul style="list-style-type: none"> <li>The principles of climate change adaptation and mitigation are embedded within this policy.</li> </ul> <p>We believe that the policy (or subsequent policies) must go further. Defining 'principles' without quantitative statements, or without enforcement policies, is unlikely to lead to the principles being achieved.</p> <p>We note that the Thatcham Strategic Plan makes virtually no reference to net zero carbon, or renewable energy schemes. If the policy were to have force, we would expect this to be a core part of the proposal.</p>	
Reading Borough Council (lpr1487)	RBC supports the principles of climate change mitigation and adaptation, as well as WBDC's declaration of a climate emergency in July 2019. RBC welcomes further co-operation across boundaries as both Councils seek achieve carbon neutrality by 2030.	Comments noted.
Tilehurst Parish Council (lpr1985)	Policy is neither supported nor not supported. It is good to see the Local Plan addressing the climate emergency although we feel there may be scope to go further (something we hope to cover in our NDP).	Comments noted.
Stratfield Mortimer Parish Council (lpr394)	<p>We support this policy overall but have reservations:</p> <p>The challenges we face from Climate change are well documented and it is good to see the local plan taking cognisance of those challenges. Even so the individual bullet points seem to vary from the very restrictive irrespective</p>	<p>Comments noted.</p> <p>The policy will apply to all development for which planning approval is required.</p>

Respondent	Response	Council Response
	<p>of cost, for example “To take advantage of the latest low and zero carbon technologies and innovations, including digital” to the rather weak or at the very least not clearly defined, for example.... “To achieve the highest viable levels of energy efficiency”.</p> <p>On a more general point the plan only envisages dealing with new development with regard to climate change while the introduction to the plan, and the supporting text to this policy, makes great play about carbon neutrality overall. Such neutrality will not be achieved by just affecting new development. Should there not be some mention of how existing development might be encouraged to adopt measures to reduce climate change. For instance, should it be made clear that this policy applies to all new development including permitted development?</p>	
Cold Ash Parish Council (lpr1732)	Policy is supported. No further comment.	Support noted
Shaw-cum-Donnington Parish Council (lpr199)	<p>We support the policy but we do not understand how these ambitious aims will be met. For example, how do you force a developer to “...recycle and waste reduction both during construction and occupancy”. A study of the North Newbury development (pre this policy) has no such requirements. There is no renewable energy requirements on this development. It will be recalled that the WBC had a policy of requiring dwellings to be BREEAM excellent but this had to be abandoned after an appeal was lost. Thus this policy is dependent on a change to building regulations or the gift of such powers to local authorities. The text gives no indication how these laudable aims will be achieved.</p>	<p>Comments noted.</p> <p>The Sustainability Statement and any subsequent conditions applied at the planning application stage and subsequently enforced along with Building Regulations, will ensure that the policy is complied with. Government guidance and policy has been constantly updated in recent years. The Government is in the process of consulting on a Future Homes Standard which it hopes to pass into legislation in 2024. An interim change to the Building Regulations occurred in June 2022.</p>
Vale of White Horse & South Oxfordshire District Councils (lpr1777)	<p>Policy is neither supported nor not supported.</p> <p>We are pleased to see the draft Plan’s acknowledgement of the urgent need to respond to climate change, which is a high priority corporate objective for the Vale of White Horse District. In particular, we support the criteria-based approach to the assessment of development proposals set out in Policy SP5 (Responding to Climate Change).</p>	Comments noted.

Respondent	Response	Council Response
South Oxfordshire District Council (lpr1782)	We are pleased to see the draft Plan's acknowledgement of the urgent need to respond to climate change, which is a high priority corporate objective shared with South Oxfordshire District Council. In particular, we support the criteria based approach to the assessment of development proposals set out in Policy SP5 (Responding to Climate Change).	Comments noted.
Environment Agency (lpr1659)	We recommend you strengthen the bullet point on flood risk: Include Natural Flood Management (NFM) measures where feasible, including re-connecting rivers to their floodplains. This is to ensure that development provides suitable mitigation and adaptation to climate change, taking into account the long-term implications for flood risk, and safeguards the future resilience of communities and infrastructure to climate change impacts. This is in accordance with Paragraph 149 of the National Planning Policy Framework (NPPF) We have mentioned NFM further under Policy SP6 – Flood Risk.	Comments noted.  Policy SP6 Flood Risk is more appropriate to consider this topic but SP5 does say "To demonstrate that flood risk from all sources can be avoided or managed in accordance with Policy SP6."
Natural England (Eleanor Sweet-Escott) (lpr1594)	We welcome consideration of Climate Change, as outlined in Policy SP5. The Local Plan should, in considering climate change adaptation, also recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition, factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. A list of useful links on consideration of climate change adaptation is provided in Annex B.	Comments noted.  Emerging Draft LPR Policy DC14 Trees woodlands and hedgerows, covers this. So do policies SP10 Green Infrastructure and SP11 Biodiversity and Geodiversity
<b>General consultation bodies</b>		
Heritage Forum (lpr70)	Policy is supported. The last bullet point, on the historic environment, would be better phrased if it referred to the harm caused by adverse environmental factors such as pollution and flooding.	The support is noted.  The policy acts on climate change for the protection of the historic environment amongst other benefits; it is not the place to rehearse the many adverse effects on the historic environment itself.



Respondent	Response	Council Response
Home Builders Federation (lpr1936)	<p>Policy not supported.</p> <p>The housebuilding industry, through the HBF, recognises that there is a need to move towards stronger measures to improve the environmental performance of new residential development. However, rather than have a variety of standards in each local plan, the HBF, and our members, consider a national and standardised approach to improving such issues as the energy efficiency of buildings, the provision of renewable energy and the delivery of electric vehicle charging points to be the most effective approach that balances improvements with the continued delivery of housing and infrastructure. The HBF considers a universal standard is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. Therefore, the HBF do not agree with the requirement for all development to achieve the highest viable levels of energy efficiency. Firstly, this is not a standard but an aspiration. Such an approach will require a viability assessment to be provided with every application and lead to further negotiation as to the level of energy efficiency that can be achieved. This provides no certainty to the applicant or the decision maker as to what is expected and is contrary to paragraph 16 of the National Planning Policy Framework (NPPF) which states that policies should be unambiguous. The HBF recognises that the Government in their recent feedback on the responses to the consultation on the Future Homes Standard (1) will continue to allow Councils to set higher standards in their local plans. However, this should be seen within the context of the higher standards that the Government are proposing to be introduced from the start of 2022 and the statement in paragraph 2.41 of their response to the consultation on the Future Homes Standard that these standards will mean it is “less likely that local authorities will need to set local energy efficiency standards”. It is also important to note that Planning Practice Guidance (PPG) continues to state that energy standards should only be increased beyond building regulations to an equivalent of level 4 of the Code for Sustainable Homes – roughly a 20% improvement in emissions. This suggests that the proposed changes to the part L, which will see a 31% improvement in emissions, is the appropriate standard to be applied from</p>	<p>Comments noted.</p> <p>The detailed implementation of the approach is set out in Proposed Submission LPR Policy DM4 (Building Sustainable Homes and Businesses along with justification.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District’s target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>

Respondent	Response	Council Response
	<p>2022 and that further local uplifts are unnecessary. Importantly the approach taken by Government is one that ensures there is sufficient time for the development industry and relevant supply chains to deliver the Future Homes Standard from 2025. The Council must recognise that this not just an issue of viability but also one of deliverability and that, as the Government notes in paragraph 2.53 of their consultation response, the interim part L standards are a key stepping stone to implementing the higher standards from 2025.</p> <p>The HBF considers the most effective approach in achieving net zero commitments alongside the homes needed in any area is through the application of Building Regulations that allow for a transition to higher standards. The importance of a collective approach will also balance the cost of delivering the energy efficiency improvements required alongside other planning obligations and development aspirations that the Council are seeking to deliver through the West Berkshire Local Plan, such as meeting housing needs in full and improving the affordability of homes in this area. We would therefore suggest that the third bullet point of SP5 is removed.</p> <p><i>(1) The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings - Summary of responses received and Government response (MHCLG, January 2021)</i></p> <p>The HBF considers the most effective approach in achieving net zero commitments alongside the homes needed in any area is through the application of Building Regulations that allow for a transition to higher standards. The importance of a collective approach will also balance the cost of delivering the energy efficiency improvements required alongside other planning obligations and development aspirations that the Council are seeking to deliver through the West Berkshire Local Plan, such as meeting housing needs in full and improving the affordability of homes in this area. We would therefore suggest that the third bullet point of SP5 is removed.</p>	
Canal & Rivers Trust (lpr866)	<p>The Canal &amp; River Trust fully support this policy and will comment further in relation to the relevant DC policies.</p> <p>Renewable energy</p>	Comments noted.

Respondent	Response	Council Response
	<p>We recognise the benefits that canals can bring in urban cooling and the Trust promote the use of canal water for heating and cooling new developments, and this can provide a valuable low carbon alternative. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy. We consider that heating and cooling schemes can be delivered without any adverse impact on biodiversity. Any Energy Assessment proposing use of such technology should demonstrate evidence of consultation with the Canal &amp; River Trust. Water from our waterways may also be used for electricity generation through hydro-electric power schemes. These sources should be included as options within studies of renewable energy potential.</p> <p>Greater reference and promotion in the plan for water based renewable energy for larger scale projects. A requirement to discuss potential opportunities for this with the EA/ Canal &amp; River Trust in advance of submitting applications.</p>	
West Berkshire Green Exchange (lpr1551)	<p><b><i>"All development should contribute to West Berkshire becoming and staying carbon neutral by 2030."</i></b></p> <p>In order to do this all housing and other buildings should be built to the highest possible standards. This means that a very high Home Quality Mark (HQM) rating should be used with a very high Home Energy Performance Rating (HEPR) to minimise electricity use. If the highest HEPR isn't used from the outset it will mean that very much more expensive upgrades to the houses insulation will be needed at a later date. Once the house is built it would only be possible to upgrade insulation by external insulation which would completely alter the character of the housing, for instance changing brick elevations to rendered ones. Building high levels of insulation into new houses from the outset is very cheap compared to the cost of having to upgrade at a later date the cost of which would probably end up coming from the public purse rather than the developers.</p> <p>Affordable homes are not affordable if they have high fuel bills and these bills are likely to rise significantly if we have to build more nuclear power stations with their guaranteed energy prices three to four times the current cost of renewables.</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>

Respondent	Response	Council Response
	<p>HEPR should be set at 0.900 or thereabouts to ensure the best quality building fabric possible.</p> <p>The HQM documentation makes the point that their low energy homes will be much more affordable to run and that this point should be taken in account by mortgage lenders if a higher price is demanded of the purchaser or renter. Adding to the cost of the build should not be a valid objection to a demand for high insulation standards through a high HEPR.</p>	
West Berkshire Green Party (lpr1828)	<p>Policy neither supported nor not supported.</p> <p>Responding to Climate Change. We broadly support this policy. As stated above, we believe Climate Change is the No 1 issue facing the council. Priority should be given to renewable energy and carbon-negative projects. In terms of building standards, we note the following recent statement from the Green Building Council: “The many local authorities that have declared climate emergencies will also be relieved that Government has confirmed that in the immediate term they can still set higher energy performance standards for new homes than those mandated by Building Regulations.” We would naturally hope that West Berkshire will set such standards. While we strongly support the aim “to improve wildlife habitat and species conservation and connectivity”, we do not believe this is compatible with the proposals elsewhere in the plan for Sandford and North-East Thatcham.</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District’s target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p> <p>Policy SP11 Biodiversity and Geodiversity includes the requirement for biodiversity net gain.</p>
The Woodland Trust (lpr1014)	<p>Policy is not supported.</p> <p>The Woodland Trust does support the comprehensive approach to addressing climate change adopted by West Berkshire, including natural solutions such as sustainable urban drainage, use of blue and green infrastructure, and linking to habitat conservation.</p> <p>However we are disappointed that there is no specific reference to the role of trees in both sequestering carbon emissions and mitigating the impact of climate change.</p>	<p>Comments noted.</p> <p>Proposed Submission LPR Policy DM15 Trees woodland and hedgerows, covers this.</p> <p>Policy SP5 states as one of its bullet points: ‘To provide for green/blue infrastructure and open spaces within the layout for shading and cooling, to detain surface water run-off and absorb carbon dioxide emissions in accordance with policy SP10’</p> <p>Policies SP10, SP11 and DM15 with SP5 cover this area.</p>

Respondent	Response	Council Response
	<p>The climate crisis is paralleled by a nature crisis and we need solutions that will tackle both.</p> <p>A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change (CCC), to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity. The Woodland Trust supports the CCC's recommended an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country's biodiversity and climate crises. More information can be found in the Trust's 2020 publication <a href="#">The Emergency Tree Plan</a>.</p> <p>In addition, trees and hedgerows help mitigate the impacts of climate change, delivering natural cooling in urban heat islands through transpiration as well as providing shelter and shade, and contributing to sustainable urban drainage systems. They also make a valuable contribution to the quality of the public realm, helping reduce air, noise and light pollution and improve people's mental health.</p> <p>We recommend including specific policy in support of new tree planting, hedgerows and urban woodland creation. We recommend setting a District-wide target for tree canopy cover, and a specific target for development sites, as part of this policy, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.</p>	<p>Policy SP10 helps by stating: 'to mitigate the causes of and address the impacts of climate change through measures such as sustainable drainage, minimalizing urban heating, flood risk management, and maximise GI to sequester carbon and provide cooling and insulation functions'</p>
<b>Other stakeholders</b>		
Graham Storey (lpr565)	<p>Policy not supported. Priority should be given to renewable energy and carbon-negative projects.</p>	<p>Comments noted.</p>
Jane Halliday (lpr607)	<p>Policy not supported. Priority should be given to renewable energy and carbon-negative projects. As estates that would be dominated by car use, the Sandleford and NE Thatcham developments contravene the council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in Vision section 3.</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero</p>

Respondent	Response	Council Response
	<p>Priority should be given to renewable energy and carbon-negative projects. Any new developments must comply with the Council's Climate Change and Environmental Policies SP5, SP8, SP10 and SP11</p>	<p>carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
<p>Ian Halliday (lpr608)</p>	<p>Policy not supported.</p> <p>Priority should be given to renewable energy and carbon-negative projects. As estates that would be dominated by car use, the Sandford and NE Thatcham developments contravene the council's climate change and environmental policies (SP5, SP8, SP10 and SP11) and the connection to local facilities outlined in Vision section 3.</p> <p>Priority should be given to renewable energy and carbon-negative projects. Any new developments must comply with the Council's Climate Change and Environmental Policies SP5, SP8, SP10 and SP11</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
<p>Tim Hall (lpr642)</p>	<p>The words "Depending on the nature and scale of proposals" provide a let-out clause.</p> <p>Delete the above words.</p>	<p>Comments noted.</p> <p>This statement is relating to the detail in the Sustainability Statement and not the mitigation or adaptation measures.</p>
<p>Ian Watson (lpr684)</p>	<p>This does not take adequate allowance for changes in rainfall patterns associated with climate change. In particular, more intense rainfall is likely to increase flood risk. Additional developments may lead to higher and/or faster run-off. While this may be compensated to some extent by SUDs this is by no means guaranteed, especially if SUDs are poorly designed or poorly installed.</p> <p>Ensure planning for increased rainfall and associated surface water run-off is properly accounted for. Both at the unit level and the development level there needs to be net-zero increase in run-off and preferable an increase in rainfall retention.</p>	<p>Comments noted.</p> <p>The policy does not endorse poor design and installation.</p> <p>Policy SP 6 Flood Risk takes a risk based and sequential approach to development proposals from the outset. It is considered that is what the policy sets out to do through the use of SUDs.</p>

Respondent	Response	Council Response
David Hill (lpr708)	<p>This policy fails to address the need to change attitudes in development. This falls short of prioritising or even encouraging sustainable development - particularly where development is shown to be carbon neutral of negative over its lifetime.</p> <p>Policy SP5 should deliver a presumption in favour of (environmentally) sustainable development. Development, including replacement property development that can demonstrate a net environmental gain should be supported.</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
Councillor Tony Vickers (lpr530)	<p>We strongly support this policy but we wish to strengthen it further. Every possible way of using planning policy to mitigate climate change must be adopted proactively.</p> <p>We wish to positively encourage developments whose main purpose is to combat climate change, such as renewable energy projects. We think these should have their own DC policy.</p> <p>It is not enough that development proposals aim to be themselves carbon neutral. Developments should aim where possible to be carbon positive, to counter-balance the many existing developments – some still being built out – which are carbon negative. Such developments should be considered as part of the essential infrastructure of the District and able to be part funded by CIL contributions from other developments.</p> <p>We also believe that all development <b>must</b> (not “should”) be required to demonstrate that every opportunity to contribute to the aim of achieving carbon neutral by 2030”.</p> <p>In second sentence, change “development should contribute” to “development <b>shall</b> contribute <b>where possible</b>” [to West Berkshire becoming and staying carbon neutral by 2030].</p> <p>Add to the end of SP 5 the following:- “Any development proposals whose main purpose is to reduce the carbon footprint of West Berkshire and which are themselves carbon positive will be looked on favourably, even if they are in conflict with other policies in this</p>	<p>Support noted.</p> <p>The Council believes that this policy together with other related policies referred to within the Plan, is clear in its intent with respect to tackling climate change through sustainable development. Carbon positive development will not be precluded on its own merits.</p> <p>The policies are intended to steer applicants and decision makers towards a balanced judgements taking account of all relevant policy material to the case. The Council does not consider ranking policies or giving one primacy over another would fit the principle of sustainable development.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>

Respondent	Response	Council Response
	<p>Local Plan. In particular, proposals which retrospectively incorporate renewable energy into local homes and communities will be supported.”</p> <p>In the supporting text (5.5) we wish to add a sentence: “This Plan therefore takes a proactive approach and requires all developers to follow the same approach and put tackling climate change at the heart of every proposal.”</p>	
Councillor Alan Macro (lpr754)	<p>Policy not supported.</p> <p>There is no policy covering renewal energy development.</p> <p>A separate policy is needed to encourage renewal energy developments where they would not have an unacceptable impact on the landscape.</p>	<p>Comments noted.</p> <p>Proposed Submission LPR Policy DM4 Building Sustainable Homes and Businesses includes policy requiring the provision of renewable energy and assessment of landscape impact.</p>
Ian Parsons (lpr828)	<p>Policy supported.</p> <p>Making it economically worthwhile to develop unused industrial, office and retail spaced for housing should be a priority.</p>	<p>Comment noted.</p>
Peter Norman (lpr1023)	<p>Policy supported.</p> <p>SP5 is full of good intent but it needs to be deeply embedded in policy documents with particular reference to having an SPD on environmental considerations and the preservation of existing biodiverse habitats, ancient woodlands and other protected habitats as required by the NPPF. If this policy is enforced it is very hard to understand how it is compatible with SP16 and the development of Sandleford and under this provision alone there should be a review of the appropriateness of Sandleford as a strategic site for housing development, when it would be a natural area to meet the Council's targets for tree planting and enhancing the ancient woodlands and habitats contained therein.</p> <p><b>5.5</b> The National Planning Policy Framework (NPPF, 2019, paragraph 149) requires that local planning authorities adopt proactive strategies to mitigate and adapt to climate change - it is hard to see from this supporting text as to how a development of Sandleford which negates every requirement in Para 149.</p>	<p>Comments noted.</p> <p>The Council does not accept the premise that development and the conservation and enhancement of biodiversity are inherently incompatible. The policies in the Local Plan that complement the Climate Change policy are intended to ensure that development is sustainable and deliver biodiversity net gain.</p> <p>The proposed sites selected for allocation in the most sustainable locations available have been subject to a robust process of assessment including a Sustainability Assessment taking account of the NPPF, including Paragraph 149. Policies are included in the Plan with respect to biodiversity and landscape, flood risk, and water resources amongst others, which will help to mitigate and adapt to climate change in the long run.</p>



Respondent	Response	Council Response
	A review should be carried out to ensure that the current housing allocation meets the needs of the climate agenda both locally and nationally.	
Nataliya Topliss (lpr797)	<p>The proposal for development fails to make any specific requirement for the development to be net zero carbon. The proposal does not address air quality issues.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	Comments noted.
John Steele (lpr519)	<p>Policy is supported.</p> <p>Policy DC37 as referenced in the fifth bullet point relates to open space and as such appears not relevant to sustainable forms of vehicular and personal transport.</p>	<p>The support is noted</p> <p>Proposed Submission LPR Policy DM40 will specifically encourage access to open spaces on foot, cycle or where necessary public transport, in an effort to reduce carbon emissions.</p>
Sue Millington (lpr461)	<p>Policy not supported.</p> <p>Any planning for the future of our district has to have the objectives of the Climate Emergency declaration and Environmental Strategy at its core.</p> <p>Priority must be given to renewable energy and carbon-negative projects.</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p> <p>The policy criteria for developments within SP5 includes, "to take advantage of the latest low and zero carbon technologies and innovations".</p>

Respondent	Response	Council Response
Suzanne McLaughlin (lpr14)	Policy is supported. No further comment.	The policy support is noted
Sam Coppinger (lpr286)	<p>Policy is supported.</p> <p>We agree that the reduction of traffic to and from industrial sites is important. Development must be sustainable in line with WBC policies. There should be a move to zero carbon - developments which look unlikely to meet this, should be rejected.</p>	<p>Comments noted.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
<b>Landowners, site promoters and developers</b>		
Pegasus Group for Donnington New Homes (lpr1943)	<p>Policy is neither supported nor not supported.</p> <p><i>Representation on behalf of Donnington New Homes in support of continued allocation of Sandlesford Park</i></p> <p>Whilst my client supports the general premise of new development responding appropriately to climate change, the response as provided at each development site needs to be aligned with national policy requirements which are in force at the time. Taking into account the speed at which technology relating to carbon neutrality progresses, a development which commences in 2022, for example, cannot be expected to provide the same degree of climate resilience measures as a development that takes place towards the end of the Plan period. The Policy therefore, needs to acknowledge this in order to provide developers with more certainty regarding the extent of measures that need to be included.</p> <p>As drafted, the Policy is aspirational, requiring developments to deliver the highest viable level of energy efficiency. This provides a lack of certainty for developers and leaves much to the discretion of Officers on a case by case basis. This means it is not possible for developers to understand the extent to which the Policy may impact the viability of a development, which could in</p>	<p>Comments noted.</p> <p>The detailed implementation of the approach is set out in Proposed Submission LPR Policy DM4 Building Sustainable Homes and Businesses along with justification.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>

Respondent	Response	Council Response
	<p>turn negatively impact on both the commercial attractiveness of potential housing land and the speed of delivery of housing.</p> <p>The Policy needs to be redrafted to instead simply require conformity with the Building Regulations that are in force at the time of the development. Such a standardised national approach is the most appropriate way to balance continuing improvements in the energy efficiency of new housing with housing delivery, and it allows a transition in standards from the current interim Part L standards to the Government's proposed higher standards to be brought in from 2022 which will see a 31% improvement in emissions from the current 20%. Given that the Local Plan is likely to still be in preparation in 2022, Policy SP5 should be drafted in anticipation of these national requirements.</p> <p>The Policy needs to be redrafted to instead simply require conformity with the Building Regulations that are in force at the time of the development. Such a standardised national approach is the most appropriate way to balance continuing improvements in the energy efficiency of new housing with housing delivery, and it allows a transition in standards from the current interim Part L standards to the Government's proposed higher standards to be brought in from 2022 which will see a 31% improvement in emissions from the current 20%. Given that the Local Plan is likely to still be in preparation in 2022, Policy SP5 should be drafted in anticipation of these national requirements.</p>	<p>The main policies for tackling climate change have been developed by consultants, the potential costs have also been tested for their impact on viability. Policy SP5 sets out the overall strategic approach to the topic while Proposed Submission LPR Policy DM4 sets out very clear targets and standards which should be met in development.</p>
Rectory Homes (lpr1848)	<p>Policy is neither supported nor not supported.</p> <p>We object to the requirement of Policy SP5 for all development to achieve the highest viable levels of energy efficiency as such an approach will require a viability assessment to be submitted with every planning application, leading to further delays due to negotiations regarding what level of efficiency can be achieved. The planning process already takes a considerable amount of time and it is our experience that even small-scale developments can take in excess of a year to be determined. The requirement for a viability assessment to assess the maximum energy efficiency measures that can be provided will delay the timescales of planning applications from date of submission to determination further. Whilst Rectory are committed to responding positively to climate change and</p>	<p>Comments noted.</p> <p>The detailed implementation of the approach is set out in Proposed Submission LPR Policy DM4 Building Sustainable Homes and Businesses along with justification.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding</p>

Respondent	Response	Council Response
	<p>we strive to make improvements to the efficiency of our development schemes where possible, the requirements under Policy SP5 as drafted provides no certainty to the applicant or the decision maker as to what is expected. This is contrary to Paragraph 16 of the NPPF which requires local planning policies to be unambiguous.</p> <p>It is therefore considered that the most effective approach to achieving improvements to energy efficiency is through Building Regulations which can outline new and universally agreed standards of development. In light of the above, we consider the third bullet point of Policy SP5 should be deleted from the policy wording.</p>	<p>to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
<p>Lichfields for North East Thatcham Consortium (lpr2395)</p>	<p>We recognise that West Berkshire has a desire to become and stay carbon neutral from 2030 and we support this ambition. We have provided a more thorough response to this policy via work undertaken by Hilson Moran at Appendix</p> <p>1 As described under our response to policy SP17 (above) it would be useful to define what 'carbon neutral' means in the context of this policy in order that the implications of it are clear and that the realism and implications for what new development must achieve as part of this can be measured. In any event, we consider it is possible to "take advantage of the latest low and zero-carbon technologies including digital" and achieve "the highest levels of energy efficiency" and support these measures.</p> <p>2 It should also be possible to "generate and supply renewable, low and zero-carbon energy for its own use and/or local distribution networks in accordance with policy DC3" (notwithstanding our comments on Policy DC3 below). However, the energy hierarchy and all advice around creating sustainable communities dictates that we would expect to seek to reduce energy demand, and then improve energy efficiency before we consider generating renewable energy as part of the suite of potential solutions.</p> <p>3 On this basis we believe policy SP5 is achievable (in energy and carbon terms) except that "generate and supply renewable, low and zero-carbon energy for its own use and/or local distribution networks in accordance with policy DC3" should be clarified.</p>	<p>Comments noted.</p>
<p>Potential Planning for Aldi Stores (lpr2289)</p>	<p>Whilst we recognise that the overarching aim of Policy SP 5 'Responding to Climate Change' is for the principles of climate change mitigation and adaptation to be embedded into new development, the Council should</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>undertake further consideration of the policy requirements to meet the criteria. It is considered that policy could be more flexible to ensure that climate change mitigation can be delivered by new development, whilst not stifling development opportunities and making proposals unviable.</p>	<p>The main policies for tackling climate change have been developed by consultants, the potential costs have also been tested for their impact on viability. Policy SP5 sets out the overall strategic approach to the topic while Proposed Submission LPR Policy DM4 sets out very clear targets and standards which should be met in development.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the District's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
<p>ProVision for Greenham Trust Ltd (lpr2374)</p>	<p>The importance of addressing climate change, and the Council's declaration of a Climate Emergency is recognised, and the LPR has an important role to play. It needs to have a clear policy on what is expected and how it can be achieved to provide certainty. It is important that policy requirements are not overly prescriptive, and so become a barrier to meeting identified development needs. Viability of development is an important consideration, and priorities need to be clearly set out in the LPR and the way that development is managed, so that the cumulative burden of developer obligations does not "undermine the deliverability of the plan"<sup>10</sup>. It is supported that development proposals should be accompanied and informed by a 'Sustainability Statement'. This policy requirement should allow for site/context specific factors and solutions, rather than a 'one size fits all' approach. The LPR should also be well evidenced in this regard, to ensure that the strategy is feasible. It appears that the LPR is not currently informed by any</p>	<p>Comments noted.</p> <p>The main policies for tackling climate change have been developed by consultants, the potential costs have also been tested for their impact on viability. Policy SP5 sets out the overall strategic approach to the topic while Proposed Submission LPR Policy DM4 sets out very clear targets and standards which should be met in development.</p>

Respondent	Response	Council Response
	<p>evidence on these matters, for example a plan-level viability assessment (other than the viability assessment of affordable housing)<sup>11</sup>. National planning policy guidance<sup>12</sup> states that: <i>“The role for viability assessment is primarily at the plan makings stage” and that it “should not compromise sustainable development but should be used to ensure that polices are realistic, and total cumulative cost of relevant policies will not undermine deliverability of the plan”.</i> The guidance also encourages local planning authorities to engage with landowners, developers and infrastructure providers to provide evidence to inform viability of plans<sup>13</sup>. It should recognise that some initiatives to combat the causes and impacts of climate change are best addressed through strategic initiatives rather than solely through individual developments. There may be a role for the Community Infrastructure Levy to play in delivering district solutions. The LPR should be reviewed in respect of viability and other relevant evidence to underpin policy requirements so that development needs are delivered over the plan period while also addressing key issues including tackling the causes and impacts of climate change.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

## Emerging Draft LPR Policy: SP6 Flood Risk

## (Proposed Submission LPR Policy: SP6 Flood Risk)

Number of responses received: 28

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team, West Berkshire Council (lpr734)	<p>Support for policy.</p> <p>Para 5.23 - There may be opportunities in river enhancement and restoration to include historic water management features such as water meadows.</p> <p>Care should be taken when creating ponds and earthwork-moving to ensure fragile archaeological features are not destroyed heedlessly.</p>	<p>Support for policy noted.</p> <p>Two new sentences have been added to paragraph 6.27 to make reference to historic water management features. Paragraph 6.27 will therefore read as follows:</p> <p><i>The policy seeks to ensure that the requirements of the Water Framework Directive are taken account of in site design and layout. Development should look at opportunities for river restoration and enhancement, and projects which reconnect rivers with their floodplains. These ideas and plans should be incorporated into plans for new development from an early stage. Options include <u>natural flood management</u>, <u>backwater creation</u>, <del>de-silting</del>, <u>de-culverting</u> and <u>naturalising the channel through in-channel habitat enhancements and removal of structures</u>. <u>There may be opportunities in river enhancement and restoration to include historic water management features such as water meadows</u>. <u>Care should be taken when creating ponds and earthwork-moving to ensure fragile archaeological features are not destroyed heedlessly</u>.</i></p>

Respondent (with lpr ref)	Response	Council Response
Principal Ecologist, West Berkshire Council (lpr1690)	<p>When development has to be located in flood risk areas:</p> <p>1<sup>st</sup> bullet - Is this the place to add something about slowing flows up stream?</p> <p>9<sup>th</sup> para of policy - All new development close to rivers and culverts should take advantage of the opportunity presented to improve and enhance the river environment, <u>water quality</u>, and contribute to biodiversity targets.</p>	<p>Comments noted.</p> <p>The 13<sup>th</sup> paragraph of policy SP6 will be amended to make reference to water quality and will read as follows:</p> <p><i>All new development close to rivers and culverts should take advantage of the opportunity presented to improve and enhance the river environment, <u>water quality</u>, and contribute to biodiversity targets. <u>To enable this, an undeveloped 10 metre buffer zone alongside main rivers and, where practicable and appropriate, ordinary watercourses should be provided. This buffer zone should be on both sides of the watercourse and be measured from the top of the river bank at the point at which the bank meets the level of the surrounding land.</u></i></p>
<b>Statutory consultees</b>		
Cold Ash Parish Council (lpr1733)	Support for policy.	Support for policy noted.
Environment Agency (lpr1680)	<p>Water Cycle Study Phase 1 - Scoping</p> <p>There are some sites that would require further investigation and analysis in a Phase 2 Water Cycle Study (WCS). This would need to involve more in depth modelling to ensure any development did not contribute to deterioration of a waterbody, or prevent a waterbody getting to good status under the Water Framework Directive. The WCS Phase 1 scoping has also highlighted many WWTWs that may require upgrades, and we would expect to see further analysis of these sites in Phase 2 WCS.</p>	<p>Since the Regulation 18 consultation on the Local Plan Review, the Phase 2 Water Cycle Study has been completed. This can be viewed at: <a href="https://info.westberks.gov.uk/evidencebase">https://info.westberks.gov.uk/evidencebase</a>.</p>
	Level 2 Strategic Flood Risk Assessment:	The advice from the Environment Agency as part of the preparation of the Strategic Flood Risk Assessment (SFRA) is welcomed.



Respondent (with lpr ref)	Response	Council Response
	<p>We have reviewed the Local Plan alongside the Level 2 Strategic Flood Risk Assessment (SFRA) as part of our cost recovery framework agreement with West Berkshire. We provided our comprehensive comments separately on this document in October 2020. We appreciate you allowing us to provide detailed comments, we hope our review of this document at an early stage will inform you going forwards, and will continue to work with you on developing this document.</p> <p>There were a number of sites put forward in the Local Plan which do not appear to be discussed in the SFRA, despite some significant flooding issues relating to these sites. For example, The 'North East Thatcham' strategic site contains an area which is an existing flood risk management structure, recently completed by West Berkshire Council (Floral Way Flood Storage Area). In addition, further surface water management schemes are being planned by West Berkshire Council within this area, including 'East Thatcham'. This site does not appear to be included in the SFRA, however given the presence of flood defences guidance will be required (in the SFRA level 2 and the local plan) as to where development would, and would not be appropriate. It is crucial that both existing flood defences, and land proposed as future flood storage areas are safeguarded against future development. This is to ensure that flood risk is not increased elsewhere, and that development is appropriately flood resistant and resilient in accordance with Paragraph 163 of the NPPF.</p> <p>Furthermore any site specific Flood Risk Assessment would need to carefully consider the impact of the development on the surface water management scheme(s).</p> <p>There are a number of other sites need to be included in the level 2 SFRA (and are not currently included):</p> <ul style="list-style-type: none"> <li>• Land at Poplar Farm Cold Ash (Site Ref: HSA 6) - The local plan highlights the need for a surface water detention basin to accommodate development drainage</li> <li>• Land adjacent to Junction 12 of M4, Bath Road, Calcot (Site Ref HSA 12) – Contains an area of Flood Zone 2</li> <li>• Land off Stretton Close, Bradfield Southend (Site Ref: HSA 22) - The Local plan states that the site flooded during January/February 2014</li> </ul>	<p>Regarding the sites not discussed in the SFRA, North East Thatcham was considered within the Level 2 SFRA produced for the Core Strategy. This will be included on the Council's website alongside the other evidence for the Local Plan Review.</p> <p>In addition, extensive additional work on the location and safeguarding of flood defences is being done with the promoters of the North East Thatcham site.</p> <p>Sites HSA6, HSA12, HSA22, HSA24, HSA25, HSA19, HSA22, and TS2 are all allocations in the adopted Housing Site Allocations Development Plan Document (HSA DPD). The HSA DPD is a daughter document of the Core Strategy.</p> <p>Sandleford is allocated within the adopted Core Strategy.</p> <p>To inform the Core Strategy, a Level 1 SFRA was produced in 2008 with a Level 2 SFRA following in 2009. Sandleford was not identified as needing assessment within a Level 2 SFRA.</p> <p>As part of work on the HSA DPD, an update to the SFRA was published in 2015. This considered changes in legislation, information on flooding in the district, and changes that had taken place to flood mapping since 2008. This update did not result in any changes being made to the Level 2 SFRA meaning that none of the HSA DPD allocations were subject to a Level 2 SFRA.</p> <p>The Level 2 SFRA has been updated to include assessments of the sites highlighted by the Environment Agency. It should be noted that several of these sites now have planning permission, and in these instances the Level 2 SFRA</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Land West of Spring Meadows, Great Shefford (Site Ref: GS1)- While only a small area of site is at risk from surface water, it should be highlighted that the village has a significant history of groundwater/surface water flooding and this will need to be assessed in more detail in relation to the site with a site-specific FRA.</li> <li>• Land off Charlotte Close, Hermitage (Site Ref: HSA 24) - Part of the site falls within a critical drainage area</li> <li>• Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25) - Part of the site falls within a critical drainage area</li> <li>• Sandleford Strategic site allocation – a Main river runs to the south of the site, and parts of the site fall within Flood Zones 2 and 3</li> <li>• Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19) – a Main river runs along edge of site and parts of the site fall within Flood Zones 2 and 3.</li> <li>• Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22) - parts of the site fall within Flood Zones 2 and 3</li> <li>• Long Copse Farm, Enborne (Site Ref: TS2) - parts of the site fall within Flood Zones 2 and 3</li> </ul>	<p>includes a summary of the planning history and flood risk and drainage considerations.</p> <p>Sandleford was not assessed in the 2009 Level 2 SFRA because the Level 1 SFRA identified that there were no known issues relating to flooding on the site or in the immediate area. Confirmation of this is set out in the Core Strategy Strategic Sites Sustainability Appraisal / Strategic Environmental Assessment paper.</p> <p>Prior to the commencement of the Level 2 SFRA, all of the sites were re-screened to take into account any changes in flood mapping. Following this, the consultants identified those sites that would need to be assessed further in the Level 2 SFRA. This did not identify North East Thatcham or GS1 Land West of Spring Meadows, Great Shefford as needing further assessment. Following the Environment Agency's comments, site GS1 has been assessed as part of the Level 2 SFRA.</p>
Greenham Parish Council (lpr893)	Support for policy	Support for policy noted.
Holybrook Parish Council (lpr1321)	Holybrook Parish Council would like to see the floodplain in the Eastern Area protected and, ideally, made into conservation areas. It is noted that the plan encourages Flood Risk mitigation measures but, in practise, these are rarely upheld. Many roads are flooded and stay that way for long periods of time because drainage trenches are not dug and those that are, are not maintained – often overgrown and full of litter.	<p>Comments noted</p> <p>The flood risk vulnerability table included in Table 3 of the Planning Practice Guidance (PPG) (para 079, ref ID: 7-079-20220825) states that within the functional flood plain only water compatible development (that has to be there and which has passed the Exception Test) is appropriate provided that it is designed and constructed to :</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of flood plain storage; and</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>The Holybrook is in poor condition with many fallen trees, consequently it is silting up and, in some places, almost form a dam. The condition of the Holybrook is important for proper management of the Kennet.</p> <p>Preserving the floodplain should be an integral part of WBC's Climate Change Policy.</p>	<ul style="list-style-type: none"> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul> <p>Water compatible development is defined in the 3 of the NPPF as:</p> <ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Lifeguard and coastguard stations.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</li> </ul>
Hungerford Town Council (Lpr131)	Support for policy	Support for policy noted.
Newbury Town Council (lpr2267)	<p>We support this policy but require more clarity around the meaning of when “the benefits of the development to the community outweigh the risk of flooding.”</p> <p><b>Reason:</b> For example, when an existing residential property in an area of high flood risk has extremely poor flood protection and is so structurally unsound as to be</p>	<p>Comments noted.</p> <p>PPG at paragraph 036 (ref id: 7-036-20220825) states that identifies examples of wider sustainability benefits to the community, and these include:</p>

Respondent (with lpr ref)	Response	Council Response
	<p>uninhabitable without extensive refurbishment, unless it has a heritage value the policy should regard the benefits to the community from replacing it with a modern, well insulated dwelling (or dwellings) that fully mitigate flood risk as well as significantly reducing the property's overall carbon footprint should mean that no sequential test is required. It is unreasonable to expect an owner to undertake work on such a property that costs more than it would to replace it. It can result in land in an otherwise sustainable location remaining out of use indefinitely, which cannot in the interests of the wider community.</p> <p><b>Change proposed:</b> In the paragraph beginning “A Sequential Test does not need ...” after “changes of use,” add “a site in a settlement that has remained unoccupied for more than three years”.</p> <p>We note in 5.14 the supporting text refers to Sequential/Exceptions Tests being needed for sites allocated within this Plan “when the proposed use and/or vulnerability classification” differs from the allocation. The LRIE DEA in Newbury is being promoted heavily for “residential led” redevelopment which ought to mean that Sequential and Exceptions Tests are needed for the whole site, since it already has a Master Plan approved by the Council as landowner. This needs to be stated explicitly somewhere, possibly here.</p>	<ul style="list-style-type: none"> <li>• The re-use of suitable brownfield land as part of a local regeneration scheme;</li> <li>• An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure; and</li> <li>• The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding NPPF policy requirements for Sustainable Drainage Systems;</li> </ul> <p>The PPG requires a sequential risk-based assessment to the location of development. Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered.</p> <p>The PPG outlines that the Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site).</p> <p>The PPG does <u>not</u> state that a sequential test is not required for sites in settlements that have remained unoccupied for more than three years.</p> <p>The Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The London Road Industrial Estate (LRIE) was promoted for consideration in the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA is an evidence document that makes a preliminary assessment of the suitability and potential of sites.</p> <p>Whilst the LRIE was originally promoted for a residential-led mixed use development, it is now being promoted for an industrial-led scheme. The LRIE site has been assessed within the Level 2 SFRA.</p>
Shaw-Cum-Donnington Parish Council (lpr200)	Support for policy	Support for policy noted.
Stratfield Mortimer Parish Council (lpr395)	<p>This policy is not strong enough. The design requirement should include ability to handle a short (30 mins) period of intense rainfall during the storm (&gt;25mm in 30 mins). This type of event causes flash flooding.</p> <p>The policy should also include local flood knowledge to ensure developments take local conditions into account. Reference Stratfield Mortimer Neighbourhood Development Plan.</p>	<p>Comments noted.</p> <p>The Council has a Sustainable Drainage Systems Supplementary Planning Document and this covers design parameters: <a href="https://info.westberks.gov.uk/sudsspd">https://info.westberks.gov.uk/sudsspd</a>. Design standards are for consistency, but all designs must allow for exceedance. It is good practice to look at historical events, although this is more usually done in a Flood Risk Assessment.</p> <p>The development plan needs to be read as a whole, and the Stratfield Mortimer Neighbourhood Development Plan forms part of the development plan.</p>
Thatcham Town Council (lpr1393)	<i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17 (lpr1401).</i>	<p>Comments noted.</p> <p>North East Thatcham was considered within the Level 2 SFRA produced for the Core Strategy. This will be included</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>"The sequential approach will be strictly applied across the District. Development within areas of flood risk from any source of flooding,"</i></p> <p>This policy appears to be written to reflect the Sequential Test as described in the Strategic Flood Assessment. We would expect that a Strategic Flood Assessment should include downstream flooding potential, in addition to fluvial flow and surface flooding.</p> <p>We do not understand why areas that contribute to downstream flooding are not considered with the same importance as flooding from fluvial flow. For example, Thatcham suffered from flooding in 2007 caused by water run-off on the hills to the North of Thatcham - the same hills that are now being proposed for development.</p> <p>The NE Thatcham site must be included as part of a strategic flood assessment, and the associated report updated.</p> <p>We recommend that the policy is strengthened to reflect the importance of run-off on downstream properties and that the Thatcham NE site is assessed on this basis.</p> <p>The area of NE Thatcham adjacent to the A4 (Siege Cross and Colthrop) leads to significant water runoff and flooding on the A4 and downstream towards Siege Cross dwellings and Colthrop industrial estate. It is likely that any flood alleviation would have to be significant and consume the lower part of the development area. This does not appear to be considered in the Thatcham strategic growth study, masterplan (Stage 3), yet it has significant implications because it is likely to overlap to the proposed areas for the school and playing fields.</p> <p>We note that the Thatcham NE site (the part that is named 'Dunston Park' to the West) includes an area where there is a public right-of-way and includes a flood alleviation scheme. During a recent inspection following a spell of dry weather it was notable that the land is saturated and extremely boggy (to the extent that the land towards the bottom of the slope is inaccessible). It is clear that the soil structure and landscape are leading to a high ground water, and this is also supported by a statement in the HELAA assessment. There is no explanation as to how a development would maintain an equivalent level of water absorption as a green-field</p>	<p>on the Council's website alongside the other evidence for the Local Plan Review.</p> <p>Extensive additional work on the location and safeguarding of flood defences is being done with the promoters of the North East Thatcham site.</p> <p>The LPR policy (SP17) for the North East Thatcham strategic site now includes the following criteria in respect of flood risk:</p> <p><u><i>An Integrated Water Supply and Drainage Strategy which will set out:</i></u></p> <ul style="list-style-type: none"> <li>• <u><i>Measure to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site; and</i></u></li> <li>• <u><i>Surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems (SuDS).</i></u></li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>particularly given that the flat-ground which is the natural site for SUDS is already occupied. We believe it is essential that appropriate surveying is conducted before the site proceeds as a credible proposal for development.</p> <p><b>Section 5.9</b> <i>"This policy aims to achieve a planning solution to flood risk management wherever possible, steering vulnerable development away from areas affected by flooding."</i></p> <p>The policy must also achieve a solution that avoids shifting a flooding problem elsewhere. The existing developments on the slopes above Thatcham (such as Dunston Park) contributed to the flooding in Thatcham in 2007 due to a failure to include sufficient drainage and/or SuDS schemes on the higher ground.</p> <p>It is essential that the policy places equal priority on houses outside the proposed development area, as to the development itself. This statement requires to be reconsidered as a sequential approach that ignores downstream flooding would be unacceptable.</p> <p><b>Section 5.10</b> <i>"This study supports this policy and has been used to evaluate allocation sites."</i></p> <p>It is our understanding that the study is for fluvial flow and does not consider downstream flooding. We request that the SFRA is reworked for the Thatcham NE to include downstream flooding.</p> <p><b>Section 5.13</b> <i>"This has already been carried out for those sites allocated within this plan ... Development should therefore comply with the requirements of national planning policy alongside this policy."</i></p> <p>The single largest, and most significant site, of NE Thatcham does not appear to be assessed and is not considered in the Level 2 plan. We request clarification from West Berkshire that the site will be assessed both for downstream flooding potential as well as on-site flooding. If the national policy is insufficient, we would request that an additional policy or assessment is made by West Berkshire.</p>	

Respondent (with lpr ref)	Response	Council Response
Environment Agency (lpr1660)	<p>We welcome this policy and support its inclusion, as there is a proportion of West Berkshire at medium and high risk of flooding.</p> <p>We welcome the inclusion of: <i>‘All new development close to rivers and culverts should take advantage of the opportunity presented to improve and enhance the river environment, and contribute to biodiversity targets’.</i></p> <p>We recommend you strengthen this policy to mention NFM, and have provided some wording to strengthen the policy. We are happy to work with you through the local plan process to implement this into this. NFM is when natural processes are used to reduce the risk of flooding and coastal erosion. It has a range of benefits – alongside reducing flood risk it can also achieve multiple benefits for people and wildlife, helping restore habitats, improve water quality and helping make catchments more resilient to the impacts of climate change.</p> <p>We body of Policy SP 6 should include NFM measures as it will ensure that development provides suitable mitigation and adaptation to climate change, taking into account the long-term implications for flood risk. It would also assist in safeguard the future resilience of communities and infrastructure to climate change impacts. This is in accordance with Paragraph 149 of the National Planning Policy Framework (NPPF)</p> <p>In addition, the supporting text to this policy should be amended to reflect this:</p> <p><b>5.2.3</b> <i>“Development should look at opportunities for river restoration and enhancement, and projects which reconnect rivers with their floodplains. These ideas and plans should be incorporated into plans for new development from an early stage. Options include Natural flood management (NFM) measures such as backwater creation, <del>de-silting</del>, de-culverting and naturalising the channel through in-channel habitat enhancements and removal of structures.</i></p> <p>Delete ‘de silting’ as it is not a NFM measure, and it does not provide a benefit in flood risk terms.</p>	<p>Support noted.</p> <p>The policy will be updated to include a new criteria (criteria p) which will include reference to Natural Flood Management and will read as follows:</p> <p><u><i>Natural Flood Management measures can be implemented.</i></u></p> <p>The supporting text to the policy at paragraph 6.27 has updated to include the suggested wording and remove reference to de-silting. It now reads as follows:</p> <p><i>The policy seeks to ensure that the requirements of the Water Framework Directive are taken account of in site design and layout. Development should look at opportunities for river restoration and enhancement, and projects which reconnect rivers with their floodplains. These ideas and plans should be incorporated into the development plans from an early stage. Options include <u>Natural Flood Management (NFM) measures such as backwater creation, <del>de-silting</del>, de-culverting and naturalising the channel through in-channel habitat enhancements and removal of structures.</u> <u>There may be opportunities in river enhancement and restoration to</u></i></p>



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	<p>It is crucial that both existing flood defences, and land proposed as future flood storage areas are safeguarded against future development. We recommend adding this wording to policy SP 6. This is to ensure that flood risk is not increased elsewhere, and that development is appropriately flood resistant and resilient in accordance with Paragraph 163 of the NPPF.</p> <p><u>Specific Comments</u></p> <p>P.33, para 6 of policy SP6: However applications for these development types should still meet all the requirements for site specific Flood Risk Assessments, the West Berkshire Sustainable Drainage Systems Supplementary Planning Document.</p> <p>P.33, para 6 of policy SP6: The following would read better: However applications for these development types should still meet all the requirements for site specific Flood Risk Assessments, as outlined in the West Berkshire Sustainable Drainage Systems Supplementary Planning Document.</p> <p>P.36, bullet at top of page (under para 5.18): Suggest adding to the list “The potential impacts of Climate Change”</p>	<p><u><i>include historic water management features such as water meadows. Care should be taken when creating ponds and earthwork-moving to ensure fragile archaeological features are not destroyed heedlessly.</i></u></p> <p>The Sustainable Drainage Systems Supplementary Planning Document (SuDS SPD) provides guidance on the approach that should be taken to SuDS in new development. The SPD does not set out requirements for Flood Risk Assessments.</p> <p>Paragraph 6.22 has been updated to include an additional criteria (criteria h) which covers climate change. It reads as follows:</p> <p><u><i>(h) The potential impacts of climate change.</i></u></p>
<b>General consultation bodies</b>		
Canal and River Trust (lpr869)	<p>Support for policy.</p> <p>There may be locations where the Trust may be able to surface water drainage into the Kennet &amp; Avon Canal, subject to quality and quantity. We are pleased to note that the supporting text mentions that a FRA should consider flooding from artificial sources, and assume that this will cover the canal. The Canal &amp; River Trust will comment on drainage and flood related matters where appropriate however it should be noted that we are not a flood authority.</p>	Support for policy noted.

Respondent (with lpr ref)	Response	Council Response
Heritage Forum	The SFRA maps and the EA flood maps should be either included or referenced.	<p>Comments noted.</p> <p>Footnote 20 of policy SP6 includes a link to the SFRA. The maps are appended to the Level 1 and Level 2 SFRAs.</p> <p>A new paragraph has been included (paragraph 6.12) has been included to make reference to the Environment Agency maps and include a footnote (footnote 24) include the URL of the Environment Agency flood maps. The paragraph reads as follows:</p> <p><i>Information on flood risk is being updated continuously and flood risk identified in the SFRA may change. The most up-to-date flood risk information should always be used to inform planning applications, including future SFRAs and the Flood Zones identified by the Environment Agency Flood Map for Planning. (24)</i></p> <p><a href="https://flood-map-for-planning.service.gov.uk/">[https://flood-map-for-planning.service.gov.uk/]</a>.</p>
West Berkshire Green Exchange (lpr1552)	No low cost housing should be allowed to be built in the highest flood risk areas of any development with a flood risk.	<p>Comments noted.</p> <p>The National Planning Policy Framework states at para 159 that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, development should be made safe for its lifetime.</p> <p>The NPPF also requires that a sequential, risk-based approach to the location of development should be taken. This approach is reflected in policy SP6.</p>
West Berkshire Green Party (lpr1829)	No low cost housing should be allowed to be built in the highest flood risk areas of any development with a flood risk.	<p>Comments noted.</p> <p>The National Planning Policy Framework states at para 159 that inappropriate development in areas at risk of flooding</p>

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		<p>should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, development should be made safe for its lifetime.</p> <p>The NPPF also requires that a sequential, risk-based approach to the location of development should be taken. This approach is reflected in policy SP6.</p>
<b>Other stakeholders</b>		
Piers Allison (lpr488)	<p>In the supporting text to Policy SP6 Water Resources, you wrote: <i>"Most of the water is abstracted from groundwater aquifers supported by some river extraction, notably the Rivers Kennet, Lambourn and Pang."</i></p> <p>Please remember that Thames Water no longer abstracts from the Pang or its chalk aquifers having ceased abstraction in Compton some years ago. Whilst Thames Water has a drought permit to abstract in Pangbourne (<a href="https://www.thameswater.co.uk/media-library/home/about-us/regulation/drought-plan/appendices/drought-plan-appendix-b.pdf">https://www.thameswater.co.uk/media-library/home/about-us/regulation/drought-plan/appendices/drought-plan-appendix-b.pdf</a>) that is only for drought reasons. In no account must any developments cause day-to-day abstraction from the Pang, within the AONB, to be restarted.</p> <p>I trust that West Berkshire Council will change its plans so that there are no new large development adjacent or almost adjacent to the AONB.</p>	<p>Comments noted.</p> <p>Consultation comments have been received from Thames Water however they have not commented on abstraction.</p> <p>The North Wessex Downs AONB covers 74% of West Berkshire and is an area where the landscape is managed to conserve and enhance its natural beauty in accordance with its national designation. It includes the rural service centres of Hungerford, Lambourn and Pangbourne, together with the service villages of Bradfield Southend, Chieveley, Compton, Great Shefford, Hermitage and Kintbury.</p> <p>The area makes a significant contribution to the uniqueness of West Berkshire with its primarily agricultural landscape and villages and small towns that have a strong sense of identity.</p> <p>The Core Strategy planned for the delivery of up to 2,000 homes over the period 2006 – 2026 in this area. The Inspector examining the Core Strategy required this to be expressed as a maximum amount in view of the national landscape designation. There are existing allocations in the AONB at the rural service centres and service villages that are still to be delivered and which will largely meet housing need in this rural area. Hungerford, Lambourn, Compton and</p>

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		Hermitage have designated neighbourhood areas for the preparation of Neighbourhood Plans and the rural service centre of Pangbourne, has limited development opportunities. Additional development for the period beyond 2026 will therefore be limited and will come in part through allocations within NDPs.
Tim Hall (lpr644)	No development should be permitted in Flood Zone 3 areas	<p>Comments noted.</p> <p>The National Planning Policy Framework states at paragraph 159 that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, development should be made safe for its lifetime.</p> <p>The NPPF also requires that a sequential, risk-based approach to the location of development should be taken.</p> <p>The flood risk vulnerability table included in Table 2 of the PPG (para 079, ref ID: 7-079-20220825) states that within the functional flood plain only water compatible development (that has to be there and which has passed the Exception Test) is appropriate provided that it is designed and constructed to :</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of flood plain storage; and</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul> <p>Water compatible development is defined in Annex 3 of the NPPF as:</p> <ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<ul style="list-style-type: none"> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Lifeguard and coastguard stations.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</li> </ul>
Keith Hoddinott (lpr1989)	<p><i>Full response attached to representation on Objective.</i></p> <p><b><u>Executive Summary:</u></b> I press the Council, through the MP (Mrs. Farris) &amp; the LGA (&amp; any other bodies they see fit – eg. professional &amp; consumer bodies), to ensure that Sections 3 &amp; 42 of the 2010 Flood &amp; Water Management Act be implemented &amp; be made mandatory for such infrastructures to be adopted alongside the outline planning approval &amp; subsequent detailed approvals, as a matter of urgency; or implement suitable planning conditions.</p> <p><b><u>1. Drainage Infrastructures</u></b> The main issues surrounding the drainage of the larger major proposed development sites is that they will all drain in some form or another into existing systems constructed in the 20th. century, when such expansions of the two Towns were not envisaged, &amp; therefore spare capacities in the infrastructures are limited &amp; will need to be enhanced (as you have demonstrated in paragraphs 10.45 &amp; 10.46). It is</p>	<p>Comments noted.</p> <p>The policy includes a requirement for all new development to include SuDS.</p> <p>The Council has an adopted Sustainable Drainage Systems Supplementary Planning Document which can be viewed at: <a href="https://info.westberks.gov.uk/sudsspd">https://info.westberks.gov.uk/sudsspd</a>. The SPD is also referenced within policy SP6.</p>

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	<p>essential that Thames Water are consulted at an early stage &amp; that contractual arrangements to solve these deficiencies are set up alongside the first “outline planning approvals”.</p> <p>Any such capacity assessments may have an impact on the timetable for any phases of the proposed developments due to the timescale to design &amp; construct any required enhancements to the existing infrastructures.</p> <p>It is therefore essential that the intention &amp;/or provisions of Sections 3 &amp; 42 of the 2010 Flood &amp; Water Management Act should be enforced in conjunction with the outline planning approval. Failure to do so are explained &amp; detailed below.</p> <p>Any foul &amp; surface water sewers should be constructed in accordance with Thames Water requirements, &amp; subsequently “adopted as public sewers”.</p> <p>Where excess surface water/land drainage compromises the risk of flooding to properties, both on site or downstream, then appropriate SUDS shall be designed &amp; constructed to the approval of West Berkshire Council (&amp; Thames Water where appropriate), &amp; subsequently adopted by the Council. Future maintenance to be funded by an agreed commuted sum between the developer &amp; the Council. These SUDS provisions can well be incorporated into the open space &amp; tree planting requirements.</p> <p>Lack of such arrangements are of particular of concern to the Thatcham Town Council &amp; the Thatcham Flood Forum. Over the past 13yrs. (since the floods in 2007), considerable effort has been made by the Thatcham Flood Forum in partnership with West Berkshire Council’s Engineers (&amp; with the active support of the former MP. Richard Benyon) to develop &amp; construct a “ring” of flood alleviation/protection infrastructures around the north &amp; east of Thatcham. The Forum &amp; Town Council are concerned that uncontrolled drainage infrastructures by developers could compromise the flood defences, &amp; hence properties, downstream. Total control over these aspects are essential to prevent future <i>unintended consequences (see below)</i>.</p> <p><b><u>Unintended consequences of failure to adopt drainage &amp; highway infrastructures</u></b></p> <p>Major national developers/house builders have developed “novel” ways to create future “income streams” by way of leasehold/ground rents &amp; estate management charges (EMC) on new developments. This practice is about to be made unlawful</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>(recent announcement by Mr Jenrick MP – Minister for Housing, Communities &amp; Local Government).</p> <p>However, developers have already started to view the non-adoption of roads, sewers, SUDS &amp; open spaces as another way to create these “future income streams” through the imposition of EMC fees.</p> <p>Once the developer has completed the building, he transfers the future maintenance, repair, reconstruction onto the house owners through the EMCs. These charges are unregulated &amp; can increase unabated.</p> <p>A further scenario is that these financial “packages” are sold onto finance companies, which can easily disappear if legal, financial or public health issues arise. The property owners are then legally responsible for the issues which have been revealed.</p> <p>Property owners &amp; prospective purchasers would be faced with financial &amp; legal problems in difficulty in selling their homes &amp; obtaining mortgages because of these excessive EMC's. Also, they are paying twice, as they will still incur sewerage charges (&amp; also Council Tax if the roads remain as private streets with future maintenance &amp; reconstruction costs also within the EMC's).</p> <p>Local Authorities could be placed in the unenviable situation in the future of serving legal notices under Public Health Acts to abate public health nuisances on Council Tax Payers if the EMC contractor has “disappeared”.</p> <p>I, therefore, press the Council, through the MP (Mrs. Farris) &amp; the LGA (&amp; any other bodies they see fit), to ensure that these Sections 3 &amp; 42 be implemented &amp; be made mandatory for such infrastructures to be adopted alongside the outline planning approval &amp; subsequent detailed approvals, as a matter of urgency; or implement suitable planning conditions.</p> <p><i>Additional information submitted 8th Feb 2021 –</i> This report [House of Commons Environment, Food and Rural Affairs Select Committee report 'Flooding' Feb 2021] may be of some use in framing the strategy to 2037. A copy of the report can be found <a href="https://publications.parliament.uk/pa/cm5801/cmselect/cmenvfru/170/170.pdf">here</a> [https://publications.parliament.uk/pa/cm5801/cmselect/cmenvfru/170/170.pdf].</p> <p><b>Submission to the Food &amp; Rural Affairs Committee HC170 (1st. sept. 2020)</b></p>	

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	<p><b>Flood &amp; Water Management Act 2010. Section 42 (adoption of sewers on new developments) &amp; Section 3 (adoption of SUDS – Surface water Urban Development Systems).</b></p> <p><b>Executive Summary:</b></p> <ol style="list-style-type: none"> <li>1. To implement Schedule/Section 3 of the 2010 Flood &amp; Water Management Act to ensure the mandatory adoption of SUDS infrastructures by the appropriate public authority as part of planning approval at outline &amp; subsequent detailed stages.</li> <li>2. To implement Schedule/Section 42 of the 2010 Flood &amp; Water Management Act to ensure the mandatory adoption of foul &amp; surface water sewers by Water Companies as part of planning approval at outline &amp; subsequent detailed stages.</li> </ol> <p><b>1. My submission is in response to the comments made at the meeting by Mr. Hugh Ellis on Q.91,96,97,98 &amp; 104; &amp; by Mr. Innes Thomson on Q.84</b></p> <p><b>2. Introduction:</b></p> <p>I am a retired Local Authority Public Health/Drainage Engineer, for 40 years, predominately being responsible for aspects of Sewerage, Sewage Treatment, Water infrastructure &amp; abstraction, &amp; associated Land &amp; Surface Water drainage. For some 10 years I was responsible for vetting developers' sewerage infrastructure proposals, leading to the adoption of sewers &amp; obtaining offsite financial contributions to enhance the existing infrastructure. This was done using the existing (at that time) Public Health Acts &amp; Planning legislation agreements, prior to planning approvals being granted.</p> <p>After 1974 I was responsible for the Sewerage Agency agreement with the Thames Water Authority, &amp; then Contract Manger under the contractual arrangements between my Council &amp; Thames Water Co., until Thames Water terminated all such arrangements in 1998, &amp; took the duties &amp; responsibilities back in-house.</p> <p><b>3. Current situation:</b></p> <p>In 2016, (after a period of time living in Europe), I was co-opted onto the Thatcham Flood Forum (which was actively supported by local MP, Richard Benyon), because of my previous 35 years' experience of the various drainage issues in the town following the extensive flooding in 2007/8.</p>	



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	<p>I was shocked to learn at how the legislation had been weakened over the past years since 1998, such that control of developers with regard to “Sewer Adoptions” was setting back the progress made prior to 1989.</p> <p>4. Since 2016, I have attempted to get to the reason for this lack of control; &amp; have had a rather one-sided correspondence with various bodies, Ministries &amp; regulators. It was due to a response from DEFRA that I came across the Scrutiny Committee’s report &amp; recommendations, to which, <b><u>I most strongly agree in respect of the long overdue implementation of Sections 42 &amp; 3.</u></b></p> <p>(It should be noted that Welsh Water incorporated Section 42 into Welsh Government law in 2012).</p> <p><b>5. Definitions:</b>  A pipe serving one property is defined as a “drain”.  A pipe serving two or more properties is defined as a “sewer”.  By definition a drain can only be private, &amp; is the responsibility of the property owner (nb. certain exceptions for maintenance where the pipe is outside the curtilage of the property; eg. under a highway).  Private sewers are maintained &amp; repaired by the owner(s).  Public sewers are those constructed or adopted by Water Companies &amp; their predecessors (Local Authorities before 1974).</p> <p><b>6. Adoption of Sewers on new developments:</b>  Due to the increase in private sewers after the war, &amp; the public health &amp; legal issues these posed for the clearing of blocked pipes, Local Authorities (LA) used public health &amp; planning legislation to ensure that new sewers on new developments were designed &amp; constructed in accordance with good practice &amp; specifications. This was enforced at the planning approval stages with mandatory agreements. The design &amp; construction was supervised by LA staff, prior to the formal adoption, &amp; the infrastructure defined on the Sewer Records as public foul &amp; surface water sewers. A similar procedure was used for the adoption of the roads &amp; highway drains.</p> <p><b>After 1974</b> these procedures were continued under the direction of the Water Authorities with LA’s under Agency agreements, &amp; then under the direction of the privatized Water Companies through Sewerage Management Contracts with LA’s.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>These arrangements came to an end in 1998, when Water Companies took back in house these arrangements with LA's.</p> <p>7. However, after 2000, planning legislation has become less rigorous in respect of mandatory agreements to ensure the adoption of sewers &amp; SUDS (&amp; roads) on new developments. <b>The situation has been made worse due to omissions / loopholes in the Flood &amp; Water Management Act 2010. Section 42 (adoption of sewers on new developments) &amp; Section 3 (adoption of SUDS – Surfacewater Urban Development Systems) were not enacted by DEFRA. And despite a Parliamentary Scrutiny Committee's recommendations in April 2017 that these Sections should be enacted as a matter of urgency, no action has been taken to date by DEFRA.</b></p> <p>8. <b>On 1st.July 2011</b>, all private sewers (prior to this date) were transferred to the Water Authorities, &amp; the Government intended that <b>the 2010 Act (Sections 42 &amp; 3)</b> would in effect continue the mandatory adoption of all sewers being the responsibility of Water Companies.</p> <p>These omissions, &amp; the separation of planning controls from the legislation requiring sewers (&amp; roads) to be the subject of mandatory adoption has led to a situation which is being exploited by large developers.</p> <p>9. The recent leasehold arrangements devised by large developers have been exposed as a scam, &amp; Government is addressing this issue. However, developers are now turning to <b>Estate Management Charges (EMG)</b> as a way of creating an ongoing "income stream" for exploitation, &amp; selling on as an investment product. These charges, (&amp; the future legal, financial, &amp; public health issues) will inevitably rise in the future. <b>It should be noted that full Council Tax &amp; Water charges will still be payable in addition to the EMG.</b></p> <p>Water Companies wish to see these loopholes closed, as they do not wish to experience another retrospective "2011 legislation" to adopt private sewers, which may not have been designed or constructed to their specification &amp; good practice.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The SUDS infrastructures would come under the control of LA's. &amp; incorporated into open spaces, adopted with a commuted sum being paid by the developer for future maintenance (a practice previously adopted by LA's under planning conditions).</p> <p><b>10.</b> There are many nuances &amp; unintended legal, financial &amp; environmental consequences to the delays in the Government's inaction on these issues:-</p> <ul style="list-style-type: none"> <li>• Inevitable annual increases in the EMGs being paid by each property owner.</li> <li>• This is leading to some Mortgage lenders questioning the long term financial &amp; legal liabilities of these charges; &amp; declining the advance of mortgages on such properties.</li> <li>• This will lead to difficulty in selling &amp; reducing the value.</li> <li>• In the event of the management company ceasing to exist, the property owners will be legally &amp; financially responsible for any outstanding construction &amp; maintenance defects.</li> <li>• If pollution occurs downstream of the site, action could be taken by the LA or other property owners against the homeowners on the estate where the infrastructures have not been adopted.</li> </ul>	
Councillor Alan Macro (lpr756)	<p>A sequential test should be required for all major developments, including those involving a change of use. A change of use may be to a more vulnerable use.</p> <p>Developments should take the opportunity to improve <b>all</b> watercourses, not just rivers.</p> <p>The statement "a Sequential Test does not need to be applied for minor development, changes of use, or development sites allocated within the Local Plan Review" should be changed to "a Sequential Test does not need to be applied for minor development".</p> <p>The statement "all new development close to rivers and culverts should take advantage of the opportunity presented to improve and enhance the river environment, and contribute to biodiversity targets" should be changed to "all new development close to watercourses and culverts should take advantage of the opportunity presented to improve and enhance the river environment, and contribute to biodiversity targets"</p>	<p>Comments noted.</p> <p>The PPG requires a sequential risk-based assessment to the location of development. Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered.</p> <p>The PPG outlines that the Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site).</p>

Respondent (with lpr ref)	Response	Council Response
David Marsh (lpr1829)	We broadly support this policy. It seems odd that the council is so intent on building flats on the football ground in Faraday Road given the risks of flooding and the fact that an adjacent planning permission has been refused because of this risk.	Support for policy noted.  The London Road Industrial Estate is owned by the Council. The Council as landowner is separate to the function of the Council as Local Planning Authority.
Paula Saunderson (lpr955)	I have no confidence that the approach outlined will be followed through especially with regard to down-stream impacts on the 2 main Chalk Rivers from development on the slopes above. And I suspect there is not enough allowance for Climate Change aspects and more frequent occurrences.	Comments noted. The Environment Agency published revised climate change allowances in July 2021. The Level 2 SFRA was updated to take these into account.
Charlotte Turner (lpr1897)	The land to the east of the A329 to the River Thames in Streatley is in Flood Zone 3B, the Functional Flood Plain and required for Flood Protection. This response is timely as we are currently in a serious flood situation and much of this land is now flooded by a combination of River and Groundwater and is functioning as a Flood Plain as designated. I have read Policy SP6 on Flood Risk. As the above land is within the most vulnerable Flood Zone 3B the mitigation measures listed which would allow development do not apply due to the highest level of Flood Risk.	Comments noted.  <i>Paragraph 159 of the NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”</i>  The flood risk vulnerability table included in Table 2 of the PPG (para 079, ref ID: 7-079-20220825) states that within the functional flood plain only water compatible development (that has to be there and which has passed the Exception Test) is appropriate provided that it is designed and constructed to : <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of flood plain storage; and</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul> Water compatible development is defined in Annex 3 of the NPPF as: <ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<ul style="list-style-type: none"> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Lifeguard and coastguard stations.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</li> </ul>
Councillor Tony Vickers (lpr531)	<p>We support many aspects of this policy.</p> <p>However a sequential test should be required for all <b>major</b> developments, including those involving a change of use. A change of use may be to a more vulnerable use.</p> <p>We want more clarity around what the specific exception to the Sequential Test “where the benefits of the development to the community outweigh the risk of flooding” means in the case of minor development proposals to improve the flood protection of housing in a flood risk area.</p> <p>What is “the community” when a proposed development only affects a small area that is already occupied by housing and has a main objective of achieving better flood protection through redevelopment of the site for new homes? Is it the whole District or is it just the occupants of the site and its near neighbours?</p>	<p>Support noted.</p> <p>The PPG requires a sequential risk-based assessment to the location of development. Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered.</p> <p>The PPG outlines circumstances when a sequential test will not be required. These circumstances changed in August 2022 following updates to the PPG. A sequential test is not required where:</p> <ul style="list-style-type: none"> <li>• The site has been allocated for development and subject to the test at the plan making stage (provided the proposed development is consistent with the use for</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>In some cases, this could result in otherwise highly sustainable sites becoming incapable of being occupied for any beneficial use, i.e. plan-led dereliction. Surely the “community benefit” in that locality can then far outweigh the need to avoid development in high flood risk areas?</p> <p>Developments should also take the opportunity to improve <b>all</b> watercourses, not just rivers.</p> <p>The statement “a Sequential Test does not need to be applied for minor development, changes of use, or development sites allocated within the Local Plan Review” should be changed to “a Sequential Test does not need to be applied for minor development”.</p> <p>The statement “all new development close to rivers and culverts should take advantage of the opportunity presented to improve and enhance the river environment, and contribute to biodiversity targets” should be changed to “all new development close to watercourses and culverts should take advantage of the opportunity presented to improve and enhance the river environment, and contribute to biodiversity targets”.</p> <p>In the supporting text, after 5.13 add a new paragraph:</p> <p>“In the case of proposals to redevelop poor quality residential properties in a high flood risk area where the main aim is to reduce flood risk without net loss of housing, a Sequential Test may not be required. In such cases, the community benefit from reduction in flood risk, together with other benefits and increased in number of habitable dwellings may significantly outweigh the guidance in the NPPF.”</p>	<p>which the site was allocated and provided there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test).</p> <ul style="list-style-type: none"> <li>• The site is in an area at low risk from all sources of flooding, unless the Strategic Flood Risk Assessment, or other information, indicates there may be a risk of flooding in the future.</li> <li>• The application is for a development type that is exempt from the test, as specified in footnote 56 of the NPPF.</li> </ul> <p>Policy SP6 has been updated to take account of the above exceptions.</p> <p>In respect of what is meant by ‘the community’, the Flood Risk section of the PPG does not provide an explanation.</p>
Ian Watson (lpr686)	<p>Supporting documents reveal a number of weaknesses in this section of the plan. It is difficult to believe that housing can be built on the flood plain which does not adversely affect flood risk either at the development site or elsewhere.</p> <p>Evidence from Thames Water shows that in some areas the sewerage system is already struggling to cope with flows especially at times of high rainfall (particularly in those areas with older surface water and foul water combined drains) and that adding new housing will make this worse.</p>	<p>Comments noted.</p> <p>Paragraph 159 of the NPPF states that “<i>inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.</i>”</p>

Respondent (with lpr ref)	Response	Council Response
	<p>While Thames Water has identified a number of investments needed to upgrade existing sewers and to provide new sewers, it is not clear how this can fit into the existing "PR" investment cycle for capital spend.</p> <p>Care is needed to ensure that the development cycles take account of constraints on capital spend by Thames Water.</p> <p>Supporting documents stated how flood risk could be reduced by adding rainwater capture and/or grey water recycling to developments.</p> <p>The cost is high and cheaper measures such as rainwater harvesting from downpipes should be considered.</p> <p>Ensure that housing development timetables are in line with what Thames Water can deliver under the constraints imposed by OFWAT. Incentivise rainwater harvesting from new and existing properties to reduce run-off and reduce demand for water e.g. for watering gardens.</p>	<p>The flood risk vulnerability table included in Table 2 of the PPG (para 079, ref ID: 7-079-20220825) states that within the functional flood plain only water compatible development (that has to be there and which has passed the Exception Test) is appropriate provided that it is designed and constructed to :</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of flood plain storage; and</li> <li>• not impede water flows and not increase flood risk elsewhere.</li> </ul> <p>Water compatible development is defined in Annex 3 of the NPPF as:</p> <ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel working.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• Ministry of Defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> <li>• Lifeguard and coastguard stations.</li> <li>• Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.</li> <li>• Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<p>Thames Water have provided comments on sites. As part of the preparation of the Phase 2 Water Cycle Study. Allocations will be phased so that development takes place after any upgrades.</p> <p>Policy DM7 of the LPR (Water Resources and Waste Water) requires in criteria b that development proposals should satisfactorily demonstrate that efficient use of water is made through recycling measures such as rainwater harvesting and grey water recycling.</p>
<p>Tony and Gail Woodhouse (lpr2023)</p>	<p><i>Extracted from main representation to SP17 Thatcham</i> Recent flood alleviation works to the North of Thatcham have been put in place to protect houses businesses and infrastructure in the areas most severely affected by the 2007 flooding event. The events will only increase. Whilst there are proposals included to manage the flow of surface water down into the valley (SUDS) they are not designed to support the heavy volume of water from such a large scale development scheme. In extreme weather events which it is recognised will only increase in frequency and intensity, SUDS will simply release their water into the existing flood management scheme adding pressure on it and increasing the risk of Thatcham flooding again.</p>	<p>Comments noted.</p> <p>The policy includes a requirement for all new development to include SuDS.</p> <p>The Council has an adopted Sustainable Drainage Systems Supplementary Planning Document which can be viewed at: <a href="https://info.westberks.gov.uk/sudsspd">https://info.westberks.gov.uk/sudsspd</a>. The SPD is also referenced within policy SP6.</p>
<b>Landowners, site promoters and developers</b>		
<p>Fowler Architecture and Planning (lp786)</p>	<p>Additional clarification is required at paragraph 5.15 concerning the Sequential Test and the area subject of an assessment to show that other reasonably available sites have been adequately considered. As an example, Policy SP3 defines that Service Villages and below in the settlement hierarchy are identified for a level of development 'in order to meet local needs'. As such, the Sequential Test should be limited to an area of search consistent with how local needs will be met and it would be helpful if Policy SP3 is referenced at 5.15.</p>	<p>Comments noted. The supporting text to the policy at paragraph 6.17 has been updated to provide further details on the sequential test area of search. Paragraph 6.17 reads as follows:</p> <p><i>In line with Planning Practice Guidance, the area of search for the sequential test should be defined by local circumstances relating to the catchment area for the type of development proposed. For some developments this may be clear, for example, the catchment area for a school. In other cases it may be identified from other policies contained within</i></p>



Respondent (with lpr ref)	Response	Council Response
		<p>the LPR, for example Policies SP1, SP3, SP20, and DM1. Alternatively it may be identified through evidence produced for the LPR, for example the 2016 Berkshire Functional Economic Market Area (FEMA) Study identified the Western Berkshire FEMA which comprises of West Berkshire District.</p>
<p>JSA Architects for Colthrop Village Consortium (lpr746)</p>	<p>Instead of saying: "Evidence provided within the Level 1 SFRA should be used to apply the Sequential Test as well as provide evidence to show that other reasonably available sites have been adequately considered." the text should read: "<i>Evidence provided within the Level 1 SFRA should be used to apply the Sequential Test as well as provide evidence to show that other reasonably available sites <b>appropriate for the proposed development</b> have been adequately considered.</i>"</p>	<p>Comments noted.</p> <p>The sixth paragraph has been reworded to reworded to read as follows:</p> <p><i>Evidence provided within the Level 1 SFRA should be used to apply the Sequential Test as well as provide evidence to show that other reasonably available sites <u>appropriate for the proposed development</u> have been adequately considered.</i></p>
<p>North East Thatcham Consortium (lpr2397)</p>	<p><i>Full representation attached to comment in Objective</i></p> <p>Weetwood has reviewed this policy requirement and note the site-specific flood risk assessment for all development that "<i>could be subject to other sources of flooding</i>" would effectively require a flood risk assessment to be undertaken for all proposed developments. The policy does go on to state that flood risk assessments should be proportionate to the proposal, but irrespective, the draft policy does appear to constitute a departure from national planning policy.</p>	<p>Comments noted.</p> <p>The Level 1 SFRA, which has been reviewed by the Environment Agency, states at paragraph 6.1 that "<i>the requirement for a Flood Risk Assessment is set out in paragraph 163 of the NPPF (footnote 50). The Flood Risk Assessment for Planning Application Applications guidance and Flood Risk Assessment for Planning Applications guidance describe when a FRA is needed as part of a planning application, how to do one and how it is processed. In West Berkshire, a site-specific FRA is required in the following circumstances:</i></p> <ul style="list-style-type: none"> <li>• <i>All developments greater than 1Ha located in Flood Zone 1.</i></li> <li>• <i>All developments located within Flood Zone 2 or 3 or, 1 in 100-year flood extent plus climate change. This includes standing advice for minor developments such as non-residential extensions, alterations which do not increase</i></li> </ul>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p><i>the size of the building or householder developments. It also includes changes of use of an existing development.</i></p> <ul style="list-style-type: none"> <li>• <i>All developments where proposed development or a change of use in development type (e.g. conversion of commercial to residential) could be subject to other sources of flooding. This applies to those less than 1Ha in Flood Zone 1.</i></li> <li>• <i>All developments located in an area which has been highlighted as having critical drainage problems by the LLFA (e.g. the CDAs defined by the SFRA) or the Environment Agency.</i></li> </ul>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP7 Design Principles

### (Proposed Submission LPR Policy: SP7 Design Quality)

Number of responses received: 32

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team, West Berkshire Council (lpr737)	Heritage is a huge element of people's sense of place - high quality and carefully considered design will become the heritage of the future. Para 5.29 - the list of local documents could usefully be updated to better follow NPPF and practice guidance on the historic environment	Comments noted. The Council agrees that it would be helpful to update the Local List to reflect the expectations of this policy and others in the LPR. The Local List will be updated.
Ecologist, West Berkshire Council (lpr1691)	3 <sup>rd</sup> design principle - Richness in detail – development will utilise architectural design which is appropriate and sympathetic to its setting in terms of height, massing, scale, proportions, roof form, materials, night and day visibility, elevational and where relevant, vernacular detailing. Hard and soft landscaping, curtilage and boundary treatment will also be appropriate and sympathetic ...and in keeping.... (I'm thinking about planting/species lists here) <del>to</del> with the natural setting;	Comments noted. The issues identified are already covered in the existing wording. 'Appropriate and sympathetic' includes 'in keeping with'. 'Setting' includes 'the natural' setting.
<b>Statutory consultees</b>		
Burghfield Neighbourhood Development Plan Steering Committee (lpr475)	The Burghfield Neighbourhood Development Plan Steering Committee support the design principle of "Opportunities for the planting of trees and other soft landscaping will be maximised." This is because this facet of development has been specifically identified during the work to produce an NDP.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
Chieveley Parish Council (lp1721)	Chieveley Parish Council agrees that new development should strengthen a sense of place through high quality locally distinctive design and place shaping and take into account local context, character and identity. Where they exist, this should continue to include taking into account Village Design Statements (para 5.28).	Comments noted.
Greenham Parish Council (lpr894)	Supports the policy	Comments noted.
Holybrook Parish Council (lpr1323)	<p>'New development will strengthen a sense of place through high quality locally distinctive design and place shaping....development will be landscape-led, conserving and enhancing the landscape character and historic context of both the site and its wider surroundings in accordance with policies SP8 and SP9;'</p> <p>HPC welcomes this policy but would like to see it strengthened to state that 'cut and paste' design of substantial housing developments will not be permitted. By way of example, the Bellway sites at Dorking Way, Calcot and Old Forest Road, Wokingham are identical in format and yet are in very different localities. In addition, the permitted Dorking Way development is in stark contrast to the existing character and design of Holybrook detracting from the Parishes previous distinctive design and it changes the shape and character of the area.</p>	<p>Comments noted. Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of this policy and the Council believes the policy sets this out in a positive way.</p> <p>The supporting text of the Proposed Submission LPR policy will be amended to read –  <u>'Identity – New development should be attractive and distinctive, complementing and enhancing</u> existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed. <u>Architectural design should be appropriate and sympathetic to the setting, in terms of height, massing, scale, proportions, roof form, materials, night and day visibility, elevation, vernacular detailing (where relevant), hard and soft landscaping, curtilage and boundary treatment.</u>  <u>Built form – All forms of development should be designed appropriately in terms of nature, location and scale.</u>  When assessing an application consideration will be given to the impact of the scheme taking into account existing approved and proposed development in the same locality <u>and considering the cumulative impact of development over time.....'</u></p>
Hungerford Town Council (lpr128)	We support this policy. Outside of defined Conservation Areas and places with a particularly distinctive character and identity there should be more scope to also encourage innovation and creativity in visual	Comments noted. Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of this policy.

Respondent (with lpr ref)	Response	Council Response
	design. Otherwise "Character and Identity" can too easily be used as an excuse for either bland pastiche heritage styling or for replicating pattern book designs from the last 70 years.	The supporting text of the Proposed Submission LPR policy will be amended to read – <u>'Identity – New development should be attractive and distinctive, complementing and enhancing</u> existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed. <u>Architectural design should be appropriate and sympathetic to the setting, in terms of height, massing, scale, proportions, roof form, materials, night and day visibility, elevation, vernacular detailing (where relevant), hard and soft landscaping, curtilage and boundary treatment.'</u>
Newbury Town Council (lpr2266)	We support this policy while noting that not all the stated bullet points will be relevant or carry the same weight in any one development.	Comments noted.
Shaw cum Donnington Parish Council (lpr201)	We support this policy but we take the view that many large recent developments pay no respect to "high quality locally distinctive design". The developments are indistinguishable from many other developments built by the large building companies. They appear to be straight out of the companies catalogue of dwellings. It is difficult to see how a modern housing development can "conserve and enhance the character, appearance and quality of an area" that was previously open countryside. Developments appear to only accord with minimum building regulations. We are therefore sceptical to the achievement of this laudable policy.	Comments noted. However, achieving high quality locally distinctive design which strengthens a sense of place is the main aim of this policy and the Council believes the policy sets this out in a positive way. The supporting text of the Proposed Submission LPR policy will be amended to read – <u>'Context – Proposals for new development should enhance the surroundings by beginning</u> with an understanding of an area's existing character and context and its design should evolve from West Berkshire's high quality and diverse landscape character and rich built and cultural heritage. <u>Identity – New development should be attractive and distinctive, complementing and enhancing</u> existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed. <u>Architectural design should be appropriate and sympathetic to the setting, in terms of height, massing, scale, proportions, roof form, materials, night and day</u>

Respondent (with lpr ref)	Response	Council Response
		visibility, elevation, vernacular detailing (where relevant), hard and soft landscaping, curtilage and boundary treatment.’
Stratfield Mortimer Parish Council (lpr396)	<p>Fully endorse this policy, seen as a vital element of new developments BUT:</p> <p>Para 5.28 “.actively encourages the production of <b>non-statutory</b> [our highlight] community planning documents such as Town and Village Design Statements and Parish” A major omission is the complete lack of reference to the contribution of an NDP. NDPs are a powerful mechanism to obtain local preferences. They are a legal/statutory document if adopted</p> <p>The requirement for developers to “how they have responded positively” is too weak to ensure developers do not water down/use own designs. Support the planting of trees but need to avoid using trees that are subject to major disease such as Ash die back.</p> <p>The policy and text should include a statement to the effect that “If an NDP is made that include statements about a sense of place through high quality locally distinctive design, place shaping, design guides, design codes these become statutory”. It is not enough to say, “to inform and support the policies contained within the Local Plan” (p39).</p>	<p>Comments noted. The Council agrees that the policy could helpfully refer to neighbourhood plans and the policy will be amended as follows:</p> <p><b>‘SP7 Design <u>Quality</u> Principles</b></p> <p>New development will <u>be required to</u> strengthen a sense of place through high quality locally distinctive design and place shaping. # <u>This will enable healthy place making, making creating places that are</u> better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.</p> <p>Development proposals <u>will be expected to</u> show how they have responded positively to both national and local design guidance. <u>At a national level this includes, including the National Design Guide (2021) or as superseded, and at a local level, this includes neighbourhood plans and</u> relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.....’</p> <p>Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of this policy and the Council believes the policy and supporting text sets this out in a positive way.</p>
Thatcham Town Council (lpr1394)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>We believe that West Berkshire and Thatcham has benefited from good policy and principles that in general have delivered buildings with distinctive styles.</p>	<p>Comments noted. However, Policy SP7 is a strategic level policy that makes clear that climate resilience is a key design principle and it is important that the LPR is read as a whole. The Council agrees that delivery of the LPR is essential and policy</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• "the siting and layout of development will promote the efficient use of land."</li> </ul> <p>The properties that follow this statement are all desirable. Nevertheless, the policy fails to consider how layout may impact on energy use - either due to orientation of building or shadowing. We recommend that this statement is reconsidered to include aspects of net-zero carbon. We agree with statements related to delivering character and identity, and richness in detail. Nevertheless, we are concerned that this is subjective and would like to understand how such statements are assessed.</p> <ul style="list-style-type: none"> <li>• Green infrastructure (GI) – development will be designed to maximise the potential for strengthening GI in accordance with policy SP10 and should include arrangements for its long-term maintenance and management;</li> </ul> <p>We welcome the statement that arrangements for long term maintenance and management are included. Nevertheless, we are aware that the Ancient Woodland ("The Plantation") associated with Dunston Park was also expected to have been adopted by West Berkshire for long term maintenance, but for whatever reason it was not adopted. Therefore, we are concerned there is insufficient follow-through on these statements and recommend that a process that allocates reserved funding sufficient for long term maintenance of green infrastructure is also defined.</p>	<p>expectations and requirements will need to be strongly implemented.</p>
Tilehurst Parish Council (lpr1987)	<p>We are concerned to see frequent use of the word "Quality" without any definition of the term. It needs to be made clear that quality reflects fitness for purpose not "luxury".</p>	<p>Comments noted. Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of this policy and the Council believes the policy sets this out in a positive way.</p>
Historic England (lpr1562)	<p>We welcome and support policy SP7: Design Principles. In particular, we agree with references to strengthening sense of place through high-quality, locally-distinctive design, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions. We also welcome the references to context, character and identity and richness in detail.</p> <p>Para 5.27 - We agree with and support the assertion that new development should begin with an understanding of an area's existing</p>	<p>Comments noted. The issues raised regarding Conservation Area Appraisals are dealt with under Emerging Draft LPR Policies SP9 and DC8.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>character and context and its design should evolve from West Berkshire's high quality and diverse landscape character and rich built and cultural heritage.</p> <p>Para 5.28 - While it is true to state that conservation area appraisals exist to help guide and shape development in and around conservation areas, it is also true that out of 53 conservation areas in West Berks, only two have appraisals. We believe this is an issue to be addressed with urgency. This is also pertinent in relation to the Revised Settlement Boundary Criteria on p230, which states that conservation area appraisals will be consulted as part of the review of settlement boundaries. See also, our comments on Policy DC8.</p>	
Natural England (lpr1595)	<p>The North Wessex Downs AONB partnership have recently published '<a href="#">Guidance on the Selection and Use of Colour in Development</a>'. We advise this is taken into account and referenced within the policy or supporting text.</p>	<p>Comments noted. The Council agrees that a reference to this guidance would be helpful. The supporting text to the policy will be amended as follows -</p> <p><u>'For development which affects the North Wessex Downs AONB these documents also include 'Guidance on the Selection and Use of Colour in Development' (2021) and 'A Guide to Good External Lighting' (2021) published by the North Wessex Downs AONB.'</u></p>
<b>General consultation bodies</b>		
British Horse Society (lpr835)	<p>We strongly support <i>'Green infrastructure (GI) – development will be designed to maximise the potential for strengthening GI in accordance with policy SP10 and should include arrangements for its long term maintenance and management'</i></p> <p>Provision for horse activities must be included on the urban fringe and in rural areas to support policy DC34. One way to ensure new paths are available to horses and are maintained is to designate them as public bridleways so that maintenance liability falls to the local Highway Authority for Public Rights of Way. Lack of maintenance has been an issue elsewhere with the Milton Keynes path network and with Sustrans paths.</p>	Comments noted.



Respondent (with lpr ref)	Response	Council Response
Canal and River Trust (lpr871)	<p>The Trust fully support this policy. However waterways sometimes present different design challenges requiring different treatment and good design plays a key role in creating attractive waterside places that will enhance and protect the waterway. Each waterside location needs to be considered individually, with no single design approach being appropriate in all locations. The following guiding principles should be taken into account so that, where appropriate, new waterside development should:</p> <ul style="list-style-type: none"> <li>• positively address the water</li> <li>• integrate the towing path and open up access to the water</li> <li>• link waterside space and the waterspace</li> <li>• use the waterspace itself</li> <li>• incorporate access and other improvements</li> <li>• engage with and tease out the qualities and benefits of being by water</li> <li>• reflect the scale of the local waterway corridor to the wider neighbourhood.</li> </ul> <p>The Trust are producing a document to better inform waterside placemaking, and this will be provided to the council as soon as it is published. The Trust wish the council to consider whether a specific waterways related DC policy would be appropriate which would include a section specific to waterside placemaking.</p>	<p>Comments noted. The supporting text will be amended to reflect the need to create attractive waterside places that enhance and protect the waterway as follows –</p> <p><u>' New waterside development adjacent to the Kennet and Avon Canal should seek to positively address the water, integrate the towing path and open up access to the water, link the waterside space to the water, make use of the water itself, incorporate access improvements, engage with the benefits of being by the water, and reflect the scale of the local waterway to the wider neighbourhood.'</u></p>
Mid & West Berkshire Local Access Forum (lpr1858)	<p>MWBLAF strongly supports the following element of this Policy: 'Green infrastructure (GI) – development will be designed to maximise the potential for strengthening GI in accordance with policy SP10 and should include arrangements for its long-term maintenance and management'</p> <p>One way to ensure new paths are maintained is to designate them as Public Rights of Way. Lack of long-term maintenance has been an issue for the Milton Keynes path network and Sustrans paths, and lessons should be learnt from these.</p>	<p>Comments noted.</p>

Respondent (with lpr ref)	Response	Council Response
North Wessex Downs AONB (lpr1623)	<p>Supports the policy. The AONB has had a colour study commissioned which aids local residents, developers and planners in understanding the natural colours of the different landscape character areas within this protected landscape and provides guidance on choosing the right materials and colour for the landscape. We would welcome a reference to it as we have unfortunately had a number of developments which look out of character and appear poor simply because the wrong materials or colour has been used.</p>	<p>Comments noted. The Council agrees that a reference to this guidance would be helpful. The supporting text to the policy will be amended as follows -</p> <p><u>'For development which affects the North Wessex Downs AONB these documents also include 'Guidance on the Selection and Use of Colour in Development' (2021) and 'A Guide to Good External Lighting' (2021) published by the North Wessex Downs AONB.'</u></p>
West Berkshire Green Exchange (lpr1553)	<p>The 'context' should also include the Climate Crisis and the Council's Climate Emergency Declaration which should take precedence over all the other items. This should set the tone for all other design decisions. <i>Character and identity – .....</i> Ancient street layouts suited the ways of living of the time often with the main fenestration of many houses orientated to the south to catch the sun and an almost blank elevation to the north which was sheltered by a long low thatched roof to provide insulation and to protect from the weather. A new 21st century vernacular should be developed using the same solar design principles to minimise energy consumption <i>Climate resilience – development will be designed to maximise the use of sustainable technologies and materials in accordance with policy SP5;</i> Developers should be required to look at the orientation of the houses to maximise winter solar penetration for best light levels and passive solar heating and to allow for the installation of a maximum number of PV panels for renewable electricity generation even if these are installed, as is easily done, at a later date. House should be built with the minimum obstructions on any south facing roofs and gable ends should be preferred to hipped roofs. <i>Parking – development will be designed to provide appropriate provision in terms of amount, layout and location in accordance with policy DC36;</i> Visitor only parking should be provided to pedestrian access points.</p>	<p>Comments noted. However, climate change is covered in Policy SP5.</p> <p>Emerging Draft LPR Policy DC35 on transport infrastructure sets out the requirements for the connectivity of new development. The policy already reflects the need to consider tree planting.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>Ease of movement – proposals will be designed to enhance the way an area functions in practical terms through a mix of land uses, by ensuring the development is well connected, accessible, safe and easy for people to find their way through and around;</i></p> <p>Developments should be designed so that no house is more than five minutes walk from a bus stop and direct walking and cycling routes should predominate. Cars should be given the lowest priority. Bus lanes should be provided at the exits to all estates with bus routes to allow priority bus passage.</p> <p><i>Clearly defined public realm - ....Opportunities for the planting of trees and other soft landscaping will be maximised</i></p> <p>Native deciduous trees, preferably edible fruit or nut trees, should be used to provide summer shading to south and west elevations of houses to prevent overheating.</p>	
West Berkshire Green Party (lpr1830)	Green Infrastructure (GI) – we would amend as follows: replace “maximise the potential for strengthening” with “strengthen”.	<p>Comments noted. The policy will be amended to refer to the National Design Guide as follows -</p> <p>‘Development proposals <u>will be expected to show how they have responded positively to both national and local design guidance.</u> <u>At a national level this includes, including the National Design Guide (2021) or as superseded, and at a local level, this includes neighbourhood plans and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.....’</u></p> <p>and the supporting text will be amended to ensure that the wording is clear as follows –  ‘... <u>Nature – development will be designed to maximise the potential for strengthening green infrastructure in accordance with Policy SP10.....’</u></p>
West Berkshire Heritage Forum (lpr72)	Add text - SP7 In Conservation Areas, Conservation Area Appraisals will show us what sympathetic design, local character and identity, and historic context ought to look like.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	5.27 In Conservation Areas, Conservation Area Appraisals will be central to achieving this objective.	
<b>Other stakeholders</b>		
Sam Coppinger (lpr288)	Supports the policy. Developments must be appropriate for a site - low impact in all senses; physically, environmentally, the infrastructure be able to support it.	Comments noted.
Tim Hall (lpr645)	Green Infrastructure (GI) - Delete " the potential to" so: "development will be designed to maximise GI in accordance with policy SP10".	<p>Comments noted. The policy will be amended to refer to the National Design Guide as follows -</p> <p><u>'Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes, including the National Design Guide (2021) or as superseded, and at a local level, this includes neighbourhood plans and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.....'</u></p> <p>and the supporting text will be amended to ensure that the wording is clear as follows –</p> <p><u>'... Nature – development will be designed to maximise the potential for strengthening green infrastructure in accordance with Policy SP10.....'</u></p>
Keith Hoddinott (lpr1991)	<p><i>Full representation including comments relating to housing design and estate layouts is attached</i></p> <p>Clearly in a small country, such as the UK, horizontal space is at a premium. Therefore, there should be some vision to think vertically, such as more 3 floor properties, and the consideration of basements &amp; underground parking. Within the boundaries of the town, there are plenty of examples of this style of building from previous generations (West Mills, Porchester Rd., London Rd. areas).</p> <p>"With this in mind, I think there was an opportunity lost not to have more underground parking (than that proposed) on the redevelopment of the bus &amp; train station area. I did suggest this during the consultation</p>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	meetings organized by the developers.” Houses should be designed to be adaptable, & to be able to be extended (incl. use of roof space) at a later date to accommodate, say an elderly relative; live-in carers, sons/daughters living at home but working/studying.	
Peter Norman (lpr1025)	SP7 a requirement should be made of all developers/housebuilders to come up with designs that reflect the locality and architectural heritage of the area as well as ensure all new housing is carbon zero. We should avoid national housebuilders helicoptering in identikit housing that they are putting up all around the country so that it becomes impossible to know what part of the country you are in based on housing. This should reflect building materials to be used so that one avoids flats such as the development at the south end of Newtown Road where the flats have been built with bricks totally out of keeping with the local area. There needs to be a preference placed on the types of building materials to be used, however this should not be to the detriment of innovative design but to ensure where standards builds are put up their finishes are in keeping with the area and distinguishes from developments elsewhere in the country.	Comments noted.  The supporting text of the Proposed Submission LPR policy will be amended to read – <u>‘Context – Proposals for new development should enhance the surroundings by beginning with an understanding of an area’s existing character and context and its design should evolve from West Berkshire’s high quality and diverse landscape character and rich built and cultural heritage.</u> <u>Identity – New development should be attractive and distinctive, complementing and enhancing existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed. Architectural design should be appropriate and sympathetic to the setting, in terms of height, massing, scale, proportions, roof form, materials, night and day visibility, elevation, vernacular detailing (where relevant), hard and soft landscaping, curtilage and boundary treatment.’</u>
Graham Storey (lpr567)	Not strong enough. I propose the following amendment: “Development will be designed to strengthen GI in accordance with policy SP10” (replacing “designed to maximise the potential for strengthening ...”)	Comments noted. The policy will be amended to refer to the National Design Guide as follows -  <u>‘Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes, including the National Design Guide (2021) or as superseded, and at a local level, this includes neighbourhood plans and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.....’</u>

Respondent (with lpr ref)	Response	Council Response
		<p>and the supporting text will be amended to ensure that the wording is clear as follows –</p> <p>‘... <u>Nature</u> – development will be designed to <del>maximise the potential for</del> strengthening green infrastructure in accordance with Policy SP10.....’</p>
Nataliya Topliss (lpr798)	<p>Every single development in Thatcham has never improved any landscaping. I have seen many times that all mature trees get cut and that developers plant a few new ones. The houses are built very tight with little green space left for any landscaping. The new occupants mostly destroy the newly planted trees to get more open space. Thatcham has turned into a grey derelict place with few mature trees left, with no park or green spaces.</p> <p>West Berks Council's strategy of 2012 indentified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted.</p> <p>The supporting text of the Proposed Submission LPR policy will be amended to read –  <u>‘Context – Proposals for new development should enhance the surroundings by beginning with an understanding of an area’s existing character and context and its design should evolve from West Berkshire’s high quality and diverse landscape character and rich built and cultural heritage.</u>  <u>Identity – New development should be attractive and distinctive, complementing and enhancing existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed. Architectural design should be appropriate and sympathetic to the setting, in terms of height, massing, scale, proportions, roof form, materials, night and day visibility, elevation, vernacular detailing (where relevant), hard and soft landscaping, curtilage and boundary treatment.’</u></p>
Councillor Tony Vickers (lpr532)	<p>We support this policy. However we note that not all the points listed as ‘bullets’ will be relevant or carry the same weight in every development proposal.</p> <p>With many residential developments using cul-de-sacs, the “character and identity” factor will need to be given less weight than the “health and wellbeing” and “ease of movement” factors, especially when taking account of the overriding priority of tackling climate change.</p>	<p>Comments noted.</p> <p>Achieving high quality locally distinctive design which strengthens a sense of place is the main aim of this policy and the Council believes the policy sets this out in a positive way.</p> <p>The supporting text of the Proposed Submission LPR policy will be amended to read –</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Past housing developments have often failed to take account of the need for permeability or have given “Design out Crime” (privacy and security) a greater weight. This results in situations in urban areas where journeys that could easily be taken by active travel mode are made longer and are instead made by vehicular means. This is unhelpful in terms of achieving mitigation of climate change.</p> <ul style="list-style-type: none"> <li>2<sup>nd</sup> bullet “Character and identity” says “layout of development will promote the efficient use of land which integrates effectively with its surroundings, contributing to local distinctiveness and sense of place through its relationship to surrounding built and natural features, spaces, historic street patterns,”</li> </ul> <p>“Efficient use of land” can crowd out space for connecting paths between dwellings that “integrate effectively” a cul-de-sac to its surroundings, making journeys longer on foot. Also ....</p> <ul style="list-style-type: none"> <li>Last bullet “Amenity” on p.37 says “development will provide a high quality of amenity and privacy for both occupants of the development itself and neighbouring properties and land;</li> </ul> <p>Vehicle movements and parking within a quiet residential area caused by unnecessary journeys by vehicle can detract from “amenity and privacy” more than harmless travel on foot into or through the area.</p> <ul style="list-style-type: none"> <li>Bullet 1 on p.38 “Health &amp; Wellbeing” says development will “encourage healthier lifestyles ...” but goes on about “improving community safety”.</li> </ul> <p>Vehicles (moving or parked) create safety hazards for people – especially children at play and the elderly. Therefore providing short cuts through a residential area is not only good for health and wellbeing in itself but should improve community safety.</p> <ul style="list-style-type: none"> <li>Fifth bullet on p.38 “ease of movement” says a development must be “well connected” but doesn’t mention active travel.</li> </ul> <p>In the “ease of movement” bullet add to the end: “..., especially by active travel means”.</p> <p>Changes needed - In the light of the emerging Local Cycling &amp; Walking Infrastructure Plan and recent Government statements about Active Travel we feel that a new “supporting text” paragraph that pulls together all these references is needed:</p>	<p><u>‘Context – Proposals for new development should enhance the surroundings by beginning with an understanding of an area’s existing character and context and its design should evolve from West Berkshire’s high quality and diverse landscape character and rich built and cultural heritage.</u></p> <p><u>Identity – New development should be attractive and distinctive, complementing and enhancing existing areas, using architectural distinctiveness (through both the quality and choice of construction materials and techniques) and high quality design, to reinforce local identity and to create a sense of place; one that is successful and enjoyed. Architectural design should be appropriate and sympathetic to the setting, in terms of height, massing, scale, proportions, roof form, materials, night and day visibility, elevation, vernacular detailing (where relevant), hard and soft landscaping, curtilage and boundary treatment.’</u></p> <p>The Local Plan should be read as a whole and it will be for the decision maker to decide how much weight to accord to the Plan and its policies, along with other material considerations.</p> <p>Emerging Draft LPR Policy DC35 on transport infrastructure sets out the requirements for the connectivity of new development and expectations regarding active travel.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>“We expect permeability for walking and cycling to be considered at the earliest stage of planning for all new major developments, so that active travel choices for journeys will be more likely among all ages and levels of mobility. It should accommodate reasonable concerns of the police through ‘Design Out Crime’ but within settlement areas, especially where there is already a good network of pedestrian and cycle routes, all major developments will be expected to help expand the local network of these routes – both on and off site - and make navigating them easier.”</p>	
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1788)	<p>It is unclear why 13 design principles are to be established and that these differ in wording and order from the National Design Guide, which has 10 characteristics. Policy SP7 should be revised to establish an overarching policy emphasis and framework that explicitly references the National Design Guide as the basis for defining the 10 characteristics for good design. Policy SP7 should be supported by a local design guide and it is disappointing to see the no reference to a commitment to prepare and adopt a new local design guide within Policy SP7 and the supporting text.</p>	<p>Comments noted. The Council agrees that the National Design Guide should provide the framework for this policy. The policy will be amended as follows:</p> <p><b>‘SP7 Design Quality Principles</b></p> <p>New development will <u>be required to</u> strengthen a sense of place through high quality locally distinctive design and place shaping. <del>‡ This will enable healthy place making, making-creating</del> places that are better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.</p> <p>Development proposals will <u>be expected to</u> show how they have responded positively to both national and local design guidance. <del>At a national level this includes, including the</del> <u>National Design Guide (2021) or as superseded, and at a local level, this includes neighbourhood plans and relevant</u> community planning documents that identify the local character and distinctiveness of an area which is valued by local communities’</p>



Respondent (with lpr ref)	Response	Council Response
Pegasus for Calcot Park Golf Club (lpr2322)	<p>This policy states that new development will strengthen a sense of place through high quality locally distinctive design and place shaping. It will make places better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.</p> <p>Calcot Park Golf Club (CPGC) consists of 81 hectares (200 acres) of gently sloping land and woodland located within the settlement of Calcot, which is surrounded on all sides by the built-up area of Greater Reading. The golf club contains considerable areas of woodland and green infrastructure. A modest housing development for up to 70 dwellings on 6.2 hectares (16.3 acres) of land at the north-eastern edge of the golf club, see Appendix 1 for details of the proposed site location, will offer the opportunity to make good use of this valuable green infrastructure to create a verdant and attractive “landscape-led” scheme, which will conserve and enhance the existing landscape character and historic context of the site and its wider surroundings. The location of the site within the built-up area and on land in leisure use at present will offer unique opportunities to improve access to verdant, open areas and leisure facilities for new residents and existing ones. The health and well-being benefits of the proposal for the local population, will be significant.</p> <p><i>Policy SP7 – Design Principles is supported.</i></p>	<p>Comments noted.</p> <p>Please see the Council’s response to lpr2328 under Policy SP14.</p>
Pegasus for Newbury and Crookham Golf Club (lpr2050)	<p>This policy states that new development will strengthen a sense of place through high quality locally distinctive design and place shaping. It will make places better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.</p> <p>Newbury and Crookham Golf Club (NCGC) consists of 50 hectares (123 acres) of undulating land immediately to the east of the built-up area of Newbury, as delineated by Pigeons Farm Road. NCGC contains considerable areas of woodland and green infrastructure. A modest housing development on 2 hectares (5 acres) of land at the western edge of NCGC, which sits on relatively flat land, will offer the opportunity to make good use of this valuable green infrastructure to create a verdant and attractive “landscape-led” scheme, which will</p>	<p>Comments noted.</p> <p>Please see the Council’s response to lpr2056 under Policy SP14.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>conserve and enhance the existing landscape character and historic context of the site, which is the seventh oldest golf course in England, as well as its wider surroundings. The location on the edge of the countryside and land in leisure use at present will offer unique opportunities to improve access to the countryside and leisure facilities for new residents and existing ones. The health and well-being benefits of the proposal for the local population will be significant.</p>	
<p>Southern Planning Practice for the Saunders family (lpr1925)</p>	<p>We support the design principles set out in Policy SP7 and can confirm that any future residential development on land east of Stoney Lane would ensure these principles are incorporated.</p> <p>The allocation of the site would strengthen the sense of place in this area of Newbury. Together with the land at Coley Farm, the site could provide a comprehensive development which would create a distinctive place. This approach would be in accordance with the recent NPPF consultation (January 2020) which focuses on place-making. The opportunities and constraints plan indicatively shows how the two sites would seamlessly integrate. The site is in a sustainable location and is of a scale which could deliver a high-quality landscape-led development with many public benefits. One key benefit the site could offer is the provision and strengthening of the Green Infrastructure in the area. The site could provide a large area of public open space together with creating links to the Copse to the east and the new residential development proposed at Coley Farm to the south west.</p>	<p>Comments noted.</p> <p>Please see the Council's response to lpr1928 under Policy SP13.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: SP8 Landscape Character****(Proposed Submission LPR Policy: SP8 Landscape Character)**

Number of responses received: 24

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr738)	Supports the policy. para 5.36 Though the landscape of West Berkshire has been subject to over 10,000 years of human activity, I don't think it's really true to say that 'most settlements can trace their origins back over many millennia'. Centuries would be a bit more accurate, as most of our towns and villages are certainly Saxon in origin, ie one millennium plus a few hundred years!	Comments noted.  Amend paragraph 5.36 of the Emerging Draft LPR as follows – '...most settlements can trace their origins back over many <del>millennia</del> <u>hundreds of years.</u> '
<b>Statutory consultees</b>		
Cold Ash Parish Council (lp1734)	Cold Ash Parish Council supports this policy and notes that there are many areas outside of the AONB that require protecting.	Comments noted
Greenham Parish Council (lpr895)	Supports the policy	Comments noted
Hungerford Town Council (lpr130)	Supports the policy	Comments noted
Lambourn NDP Steering Group (lpr1704)	The Lambourn Landscape Character Appraisal has identified the Lower Lambourn Valley Floor {between Bockhampton and the Parish boundary with East Garston} as a landscape character area (LCA6). Several of the	Comments noted

Respondent (with lpr ref)	Response	Council Response
	<p>recommendations for the management and protection of the river in LCA6 could also be applied to its course through the Parish from its source:</p> <ul style="list-style-type: none"> <li>• <i>Much scope to improve and enhance the water quality of the River Lambourn. In a catchment dominated by arable fields the potential for nitrates, potassium and phosphates to enter the water course is high. Opportunities to shield the river with appropriate land use that can help filter agricultural run-off will help improve water quality.</i></li> <li>• <i>Understand the requirements of the river in a changing climate and avoid planting trees that may interfere with the water course; altering the delicate hydrological and biological balance of this chalk river.</i></li> <li>• <i>Celebrate and recognise the river. At points it is almost entirely lost amongst the houses and buildings that live the river; let the river breathe and give it space.</i></li> </ul> <p>The River's importance as a landscape feature through the Parish cannot be overstated and it is "a valuable economic and recreational asset for the area".</p>	
Newbury Town Council (lpr2265)	<p>We support this policy but would like clarification as to what is meant by "perceptual components" of the character of the landscape. We would also like to see some reference to features that are widely regarded as eyesores in the landscape – even the urban scene – such as the former post office building (the BT Tower) at the junction of Bear Lane and A339. We would dearly like to see something in the Local Plan that provides strong encouragement for development that removes such eyesores.</p>	<p>Comments noted.</p> <p>Add the following definition of 'perceptual components of landscape character' to the glossary: '<u>Our own personal appreciation of landscape and how we relate to or make use of it as individuals and communities through sight, sound, smell and feel.</u>'</p> <p>As part of the evaluation of individual landscape character areas, the West Berkshire Landscape Character Assessment (LCA) 2019 identifies key detractors and issues including past, current and likely future trends that bring about change in the landscape and sets out landscape guidance focused on development management considerations to enhance the landscape of the area.</p>

Respondent (with lpr ref)	Response	Council Response
Shaw cum Donnington Parish Council (lpr202)	<p>We support this policy.</p> <p>Whilst the supporting text concentrates on the AONB and rural areas it should also apply to the urban areas since the urban areas are equally entitled to a high quality of landscape.</p>	<p>Comments noted</p> <p>The policy applies across the whole of the District. It complements and will be read alongside Policy SP7 Design Quality.</p>
Stratfield Mortimer Parish Council (lpr397)	<p>Supports the policy</p>	<p>Comments noted</p>
Thatcham Town Council (lpr1395)	<p><i>Part of full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <ul style="list-style-type: none"> <li>The natural, cultural, and perceptual components of the character of the landscape will be considered as a whole.</li> </ul> <p>With regards to the Thatcham NE site, the existing landscape is agricultural interspersed with well-maintained and historic hedgerows, a scattering of ancient trees, and bounded by well-established woodland or hedgerows. These natural landscape features provide the countryside feel towards the edge of the existing settlement and define the countryside landscape beyond.</p> <p>Historic hedgerows are valuable to the ecology of an area and support a wide range of biodiversity and wildlife. It is not possible to remove a historic hedgerow and claim a substitution of biodiversity elsewhere as the ecology may have developed over many decades, or hundreds of years. Therefore, these features should be retained wherever possible and natural wildlife corridors should be sought that lead to more of an 'ecovillage feel' built on principles of net-zero carbon.</p> <p><b>Section 5.33</b></p> <ul style="list-style-type: none"> <li>"A landscape does not have to have a designation to be valued locally."</li> </ul> <p>We agree with this completely. Nevertheless, little regard seems to have been made to the loss of countryside which is valued highly by residents of Thatcham. It is necessary that consideration is given to the &gt;2,500 residents that have made representation and objected to the development.</p>	<p>Comments noted. The issues raised are in relation to development at North East Thatcham and so will be considered as part of the Council's response to Policy SP17.</p>

Respondent (with lpr ref)	Response	Council Response
Historic England (lpr1563)	We support policy SP8: Landscape Character. In particular we welcome references to local character and distinctiveness, and conserving and enhancing historic character.	Comments noted
<b>General consultation bodies</b>		
Canal and River Trust (lpr872)	Supports the policy. Para 5.33 please include the canal: the Outside the AONB, the River Kennet and Kennet & Avon canal, from Newbury to Reading... LVIA's should recognise that views from canal towpaths and the canal itself are visually important, particularly due to the often slow moving nature of those using them, This is often forgotten about when a LVIA is being prepared.	Comments noted.  Amend paragraph 5.33 to the Emerging Draft LPR as follows: '.... Outside the AONB, the River Kennet and the inter-connected Kennet & Avon Canal from Newbury to Reading, lies within....'
North Wessex Downs AONB (lpr1624)	Supports the policy. The AONB has had a colour study commissioned which aids local residents, developers and planners in understanding the natural colours of the different landscape character areas within this protected landscape and provides guidance on choosing the right materials and colour for the landscape. We would welcome a reference to it as we have unfortunately had a number of developments which look out of character and appear poor simply because the wrong materials or colour has been used.	Comments noted.  Add a reference to ' <a href="#">Guidance on the Selection and Use of Colour in Development</a> ' as part of the supporting text to Policy SP7. This policy will be read alongside Policy SP7.
West Berkshire Green Party (lpr1831)	We broadly support this policy.	Comments noted
West Berkshire Heritage Forum (lpr105)	Supports the policy	Comments noted
<b>Other stakeholders</b>		
Sam Coppinger (lpr289)	Supports the policy	Comments noted
Tim Hall (lpr646)	Supports the policy	Comments noted
David Hill (lpr709)	Policy SP8 supports the preservation of the landscape and ignores the need for a landscape to evolve. It seeks to preserve properties and development	Comments noted. The policy and supporting text clearly set out that appropriate landscape-led development will be

Respondent (with lpr ref)	Response	Council Response
	<p>types which are now deemed inefficient and out of kilter with modern energy efficient development standards. It conflicts with policies relating to the climate crisis.</p> <p>Policy SP8 should encourage design which is sympathetic with the character of the landscape it sits within, rather than the buildings which are constructed within it.</p>	<p>supported. Its purpose is to ensure development proposals are informed by an understanding of the distinctive character of West Berkshire and that this understanding is used as a positive tool in accommodating change by ensuring the inherent qualities and valued features of the district's landscape will continue to be appreciated. It complements and will be read alongside Policy SP5 which sets out the Council's approach to Responding to Climate Change and Policy SP7 Design Quality.</p>
Peter Norman (lpr1027)	<p>Embedded in SP8 should be reference to preservation and enhancement of biodiversity in the local landscape</p>	<p>Comments noted. The policy makes clear that the natural, cultural and perceptual components of the landscape will be considered as a whole. This includes biodiversity.</p>
Nataliya Topliss (lpr799)	<p>No developments that took place in Thatcham have ever conserved or enhanced the local landscape. West Berks council consider these issues but nothing ever gets implemented on the developments.</p> <p>West Berks Council's strategy of 2012 identified that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted. The issues raised are in relation to development at North East Thatcham and so will be considered as part of the Council's response to Policy SP17.</p>
Councillor Tony Vickers (lpr533)	<p>We support this policy. However we would like to understand what "perceptual components" of the landscape character are.</p> <p>We would also like to see reference to elements in the existing landscape that are regarded as eyesores (e.g. BT Tower in Newbury and overhead powerlines in the AONB) and some suggestion that proposals to remove or reduce the "perceptual harm" they cause will be welcomed.</p> <p>Some features within both the rural and urban landscape are almost universally regarded as ugly eyesores or at best inappropriate and detract from the landscape setting, although such judgements are perhaps subjective. It would seem desirable to be able to have a policy in the Local Plan that at least identifies them and states that proposals involving their removal or shielding from view would be welcomed.</p>	<p>Comments noted.</p> <p>Add the following definition of 'perceptual components of landscape character' to the glossary: <u>'People's perceptions have a key role in defining a landscape. These can vary depending on who they are and how they relate to it or how they make use of it as both individuals and communities. Landscape is perceived through sight, sound, smell and feel and can be influenced by the weather, the seasons or time of day.'</u></p> <p>As part of the evaluation of individual landscape character areas, the West Berkshire Landscape Character</p>

Respondent (with lpr ref)	Response	Council Response
	We are unsure whether such a policy is possible or if this is the place to mention it.	Assessment (LCA) 2019 identifies key detractors and issues including past, current and likely future trends that bring about change in the landscape and sets out landscape guidance focused on development management considerations to enhance the landscape of the area.
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1787)	<p>The policy omits any reference to 'mitigation' when considering whether development will be appropriate to its landscape context. Inclusion of mitigation within the policy is important as the immediate impacts of development may have a degree of harm, yet they are capable of being mitigated over time as landscaping matures.</p> <p>The policy also needs be revised to enable the decision maker to distinguish between the hierarchy of international, national and locally designated sites (as per paragraph 171 of the NPPF) and identify those landscapes that are valued (as per paragraph 170). In this context, a linkage back to Policy SP2 would be useful in recognising the national value of the North Wessex Downs AONB which should be treated differently as per the Statutory Purposes for which it was designated.</p>	<p>Comments noted.</p> <p>The policy and supporting text make clear that proposals for development should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and IEMA. This should address both the potential landscape effects and also the potential visual effects that may result from the development. Detailed development proposals will then be expected to respond positively to this assessment to ensure they conserve and enhance landscape character by strengthening a sense of place in accordance with Policy SP7. Should mitigation be required either through the iterative design process, construction stage or to deal with any potential adverse effects following construction, this would be considered as part of this process.</p> <p>There is no definition of 'valued landscape' in the NPPF and the Council has adopted an evidence based approach.</p> <p>Amend third paragraph of the policy as follows: '<u>.....These assessments provide an understanding of the valued characteristics, features and qualities of identified local landscape character areas across West Berkshire.</u>'</p> <p>Paragraph 5.34 of the Emerging Draft LPR makes clear that 'Value can apply to areas of landscape as a whole or</p>



Respondent (with lpr ref)	Response	Council Response
		<p>to individual elements, features and aesthetic or perceptual dimensions which contribute to the character of the landscape. There are no locally designated landscapes in West Berkshire. All landscapes across the District have some degree of value and all development should therefore respond positively to the identified character and valued qualities inherent in that local landscape. The West Berkshire Landscape Character Assessment 2019 evaluates and provides an understanding of what is important and why, for each identified local landscape character area across the District.'</p> <p>Paragraph 5.32 makes clear that 'As a nationally valued and designated landscape the North Wessex Downs AONB will be conserved and enhanced in accordance with its national status and this is set out in Policy SP2.'</p>
JSA Architects on behalf of the Colthrop Village Consortium (lpr755)	<p>The Colthrop Village Consortium are concerned that the Landscape Character Assessment denotes the entire South Thatcham Valley Farmland as being uniformly sensitive to change and marks that sensitivity as "medium to high". There are great variations in sensitivity across the area and the Consortium's site (HELAA Ref. THA1) is affected by proximity to the industrial area, overhead pylons, brownfield land - being the former paper mill site, the railway and a lower level of tranquillity. The Thatcham Strategic Growth Study also shows much of the site as wooded, which it is not. Remove reference to the West Berkshire Landscape Character Assessment. The Consortium do not disagree with the policy per se except in reference to the West Berkshire Landscape Assessment which is a crude tool. Recognise that Area 8D is actually comprised of differing levels of sensitivity to change.</p>	<p>Comments noted.</p> <p>The comments relate to a specific site being promoted for development as part of the Housing and Economic Land Availability Assessment (HELAA).</p> <p>The Council considers the West Berkshire Landscape Character Assessment (LCA) 2019 forms a sound evidence base to conserve and enhance the varied character and valued attributes of the district's landscape when considering new development or land uses and to pursue opportunities to enhance and strengthen the local distinctiveness of West Berkshire's landscape. It also provides a robust framework for more detailed site specific landscape sensitivity and capacity studies to be undertaken for specific development proposals such as this.</p>

Respondent (with lpr ref)	Response	Council Response
Pegasus for Calcot Park Golf Club (lpr2324)	<p>This policy states that landscape-led development which conserves and enhances the biodiversity and local distinctiveness of the landscape character of the district will be supported. With regard to development proposals, particular regard will be given to: valued features and qualities; sensitivity and capacity of area to change and ensuring that new development is appropriate in terms of location, scale and design to the context of the existing settlement form, pattern and character.</p> <p>Calcot Park Golf Club (CPGC) does not lie in a sensitive landscape location. The site is remote from the AONB to the west and it is surrounded on all 4 sides by urban development. As stated above, the 81-hectare land holding contains substantial areas of woodland and Green Infrastructure (GI). The proposed development, of just 6.2 hectares, in the north-eastern corner of CPGC, adjoining the existing built-up area, will be screened by dense areas of woodland on all sides. The sloping topography and the existence of significant woodland and GI, means that there are few long-distance views into the site and the development site makes a modest contribution to the landscape setting of the settlement and the surrounding area.</p> <p>In this context, any planning application for development on the CPGC will be supported by a Landscape and Visual Impact Assessment (LVIA), which will demonstrate that the new buildings will not have a harmful impact on the existing settlement form, pattern and character and will come forward as part of a landscape-led scheme.</p> <p>Furthermore, the proposed replacement clubhouse, which will be funded by the new residential development, will be surrounded by additional landscape planting, to ensure that it blends into the landscape and does not result in any additional harm over that attributable to current built form being done to the site and its surroundings, including the Grade II* Calcot Court. The new homes and clubhouse will provide significant economic, environmental and social benefits for the local community, whilst not harming the landscape character of the area and its surroundings.</p> <p><i>Policy SP8 – Landscape Character is supported.</i></p>	<p>Comments noted.</p> <p>No changes proposed. The comments relate to a specific site being promoted for development as part of the Housing and Economic Land Availability Assessment (HELAA). The Council's response to this particular site is set out to lpr2328 under Policy SP14.</p>
Pegasus for Newbury and Crookham Golf Club (lpr2051)	<p>This policy states that landscape-led development which conserves and enhances the biodiversity and local distinctiveness of the landscape character of the district will be supported. With regard to development proposals, particular regard will be given to: valued features and qualities;</p>	<p>Comments noted.</p> <p>No changes proposed. The comments relate to a specific site being promoted for development as part of the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>sensitivity and capacity of area to change and ensuring that new development is appropriate in terms of location, scale and design to the context of the existing settlement form, pattern and character.</p> <p>Newbury and Crookham Golf Club (NCGC) does not lie in a sensitive landscape location. The site is remote from the AONB to the north, while closer to the north-west is the racecourse and to the south is the former Greenham Common Air Base. As stated above, the 50-hectare land holding contains substantial areas of woodland. Any development, of just 2 hectares, in the south-western corner of NCGC, adjoining the existing built-up area, will be screened by dense areas of woodland. The flat topography and the existence of significant woodland means that there are no long-distance views into the site and the development site will therefore make little significant impact to the landscape setting of the settlement or the surrounding area; development may arguably improve the setting.</p> <p>In this context, any planning application for development on the NCGC will be supported by a Landscape and Visual Impact Assessment (LVIA), which will demonstrate that the new buildings will not have a harmful impact on the existing settlement form, pattern and character and will come forward as part of a landscape-led scheme.</p> <p>Furthermore, the proposed demolition and replacement of the clubhouse, which will be funded by the new housing development, will be a wholly single-storey building, which will be surrounded by landscape planting, to ensure that it blends into the landscape and does not to any harm being done to the site and its surroundings. The new homes and clubhouse will provide significant economic, environmental and social benefits for the local community, whilst not harming the landscape character of the area and its surroundings.</p>	<p>Housing and Economic Land Availability Assessment (HELAA). The Council's response to this particular site is set out to lpr2056 under Policy SP13.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP9 Historic Environment

### (Proposed Submission LPR Policy: SP9 Historic Environment)

Number of responses received: 24

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr739)	Supports the policy. I don't agree with the first sentence of the policy - it can be the case that new development doesn't always sustain and enhance the historic character and environmental quality of a place. This needs to be qualified to say that the Council will support those proposals that do.	Comments noted.  Amend the first paragraph of the policy as follows – <u>'Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised.</u> The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will <u>also</u> be sustained and enhanced through new development....'
<b>Statutory consultees</b>		
Aldermaston Parish Council (lpr1054)	Para 5.3 Annual Heritage at Risk Register. This should include Aldermaston Manor and Grounds	Comments noted. It is acknowledged that Aldermaston Manor is currently on the Heritage at Risk Register and is one of 15 such entries in West Berkshire. The supporting text does not name any individual entries but a hyperlink will be included in the Proposed Submission LPR to link to the Heritage at Risk Register where further details can be found.
Greenham Parish Council (lpr896)	Supports the policy	Comments noted

Respondent (with lpr ref)	Response	Council Response
Hungerford Town Council (lpr129)	Strongly agree with the conservation and enhancement of the historic character of the areas particularly in places such as Hungerford Town centre and Eddington and distinctive isolated buildings	Comments noted
Newbury Town Council (lpr2264)	<p>We support this policy but wish to add another category to the list of what constitutes “heritage”: “ancient ways”.</p> <p><b>Reason:</b> our precious rights of way network is not just an important transport and green infrastructure feature but also very largely an important vestige of the history of the area. Many footpaths, tracks, ‘green lanes’ and drove roads enhance our landscape and need to be preserved for the education as well as enjoyment and practical use by future generations. Too often their heritage value is destroyed with careless urbanising treatment by developers, if they are not altogether obstructed, neglected, or demolished entirely.</p> <p>Wherever possible all such historic routes should be preserved in the state they are found at the time a site is brought forward for development, or at least as much of them as possible incorporated in the public rights of way network through Definitive Map Modification Orders (DMMOs) to ensure they remain open for use, protected and well managed. This is as important within settlements as in the open countryside.</p> <p><b>Proposed changes:</b> add in “f)” after “areas” the words “historic routes”.</p>	<p>Comments noted</p> <p>The NPPF defines a heritage asset as ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.’ This policy uses the same definition for consistency.</p> <p>Historic public rights of way would be considered under criterion g) of the policy.</p> <p>Amend criterion g) of the policy as follows – ‘.... or through the development management <u>or other planning processes.</u>’</p> <p>In the supporting text add a bullet point to the end of paragraph 5.46 of the Emerging Draft LPR as follows –</p> <ul style="list-style-type: none"> <li>• ‘<u>Historic Public Rights of Way</u>’</li> </ul>
Shaw cum Donnington Parish Council (lpr203)	We support the policy. In Shaw-cum-Donnington we have Donnington Castle and Shaw House. With Shaw House we particularly look forward to the restoration of the grounds of the building and some of the surrounding area particularly to the South. We expect to see details of this in the long expected CAMP document.	Comments noted
Stratfield Mortimer Parish Council (lpr398)	Supports the policy	Comments noted
Thatcham Town Council (lpr1396)	Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17. We agree that the historical environment should be maintained, and recorded, wherever possible. The	Comments noted. The issues raised are specific to North East Thatcham and so will be considered as part of the Council’s response to Policy SP17.

Respondent (with lpr ref)	Response	Council Response
	<p>area surrounding Dunston Park has historic and archaeological significance, and previous surveys have uncovered evidence of Bronze Age and Iron Age settlements. These findings have helped to support the hypothesis that Thatcham has justification for the claim of being the longest continuous habitation in England. "For known assets of archaeological interest, or on land where there is archaeological potential, an archaeological desk-based assessment will be required as a minimum." We expect that the existing evidence in NE Thatcham exceeds the minimum threshold of a desk-based assessment.</p>	
Historic England (lpr1564)	<p>We support the general historic environment policy being a strategic policy, complemented by a suite of non-strategic policies for the various types of heritage asset found in West Berks. This represents an appropriate balance between providing relevant detail and strategic direction and is in line with NPPF paragraph 20d. We welcome the general approach and specific content of policy SP9. We consider the policy and supporting text to present a robust approach that adds an appropriate level of detail and advice to national policy on the historic environment. However, we do have one specific area of concern about this policy. The first line of the policy states that 'the historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will be sustained and enhanced through new development.' This implies that it is only through new development that the historic environment will be sustained. The NPPF (185) is clear that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Historic England understands this obligation to have a wider meaning that simply as a component of planning for new development. Our view is that this obligation includes taking proactive measures in relation to the historic environment. This is position is supported by the remainder of paragraph 185, which states that heritage at risk should be considered as part of the positive strategy, as well as more general elements of the strategy, which, on the face of it, are wider than simply a part of planning for new development. The requirement of the positive strategy to include wider, positive actions is tacitly acknowledged in the supporting text to this policy, through references to community ownership and collaboration with heritage and community organisations. In order to address this concern, we recommend that the first sentence of the SP9 is</p>	<p>Comments noted.</p> <p>Amend the first paragraph of the policy as follows –  '<u>Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised.</u> The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will <u>also</u> be sustained and enhanced through new development....'</p>

Respondent (with lpr ref)	Response	Council Response
	amended to: 'The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will be sustained and enhanced both through new development and positive action by the Council.' Given that this is a strategic policy, we consider it is important to clarify this as part of the overall strategy. Without such an amendment, we would view the policy as inconsistent with national policy and therefore unsound.	
<b>General consultation bodies</b>		
British Horse Society (lpr837)	<p>This policy mentions registered parks and gardens but not registered commons. We feel more mention should be made of the West Berks Commons in the document. They are mentioned but briefly under Green Infrastructure. It should be borne in mind that many of the commons in West Berks are commons registered under the 1899 Commons Act eg. Bucklebury, Snelsmore, Padworth, Wokefield. Others are registered under other Acts of Parliament: Stroud Green, Greenham &amp; Crookham, West Ilsley, East Ilsley, Oare. Hungerford Common is in particular a historic asset dating back centuries. These are all historically registered commons, are protected by law and a much valued resource. These all have public access rights and several have equestrian rights and are important for the equestrian community. The Ridgeway is mentioned as a historic transport route but the Ridgeway is just one of the many historic drovers roads throughout West Berks which and are now part of the current public rights of way network. These routes are an historic asset, recorded in the Inclosure awards of the 18th century and reflect how our forefathers travelled through the area. We strongly suggest that these are mentioned as the historic asset they are. They allow people today to access historic features and explore and understand our heritage and the countryside today. They are protected by law but are at risk from present day agricultural practices which can remove ancient hedgerows, change the surface and nature of the way thus changing the nature of the environment. They need better protection.</p> <p>Policy Page 41: Add to the list: 'Registered commons' 'Historic public rights of way'</p> <p>Supporting text para 5.52 'The historic environment belongs to the whole community and everyone should be able to participate in sustaining this shared resource. One mechanism for achieving this is through the West</p>	<p>Comments noted.</p> <p>Registered commons and historic public rights of way would be considered under criterion g) of the policy.</p> <p>Amend criterion g) of the policy as follows – '.... or through the development management <u>or other planning processes.</u>'</p> <p>In the supporting text add bullet points to the end of paragraph 5.46 of the Emerging Draft LPR as follows –</p> <ul style="list-style-type: none"> <li>• <u>Registered commons</u></li> <li>• <u>Historic Public Rights of Way</u></li> </ul> <p>Amend para 5.52 of the Emerging Draft LPR as follows - These include Mesolithic sites in the Kennet Valley; transport routes such as the Ridgeway <u>and other old drove roads</u>, the Kennet and Avon Canal and the Great Western Railway....</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Berkshire Heritage Forum, a partnership established in 2009 to recognise, promote and protect the District's heritage. The West Berkshire Historic Environment Action Plan (HEAP), published by the West Berkshire Heritage Forum, describes the character and evolution of the area as a whole and identifies its significant historic components. These include Mesolithic sites in the Kennet Valley; transport routes such as the Ridgeway <u>and many other old drove roads such as Old Street and Green Hams Lane which connect the Newbury area to the Ridgeway</u>, the Kennet and Avon Canal and the Great Western Railway....'</p>	
Canal and River Trust (lpr873)	<p>SP9 The Canal &amp; River Trust support the heritage policies, but please see comment below.          Para 5.42 The Canal &amp; River Trust request that the Kennet &amp; Avon Canal is considered as a non- designated heritage asset in areas where no other formal designation such as a conservation area exists and that it be added to the list.          5.53. The Trust would welcome discussions with the West Berkshire Heritage forum to understand if the canal and its various designated and non-designated assets need further consideration.</p>	<p>Comments noted.</p> <p>The Council can confirm that the Kennet &amp; Avon Canal and all the associated locks and bridges are on the Historic Environment Record. In areas where no formal designation exists it would therefore be considered under criterion g) of the policy as a non-designated heritage asset.</p> <p>The Council agrees and would welcome discussions between the Trust and Heritage Forum.</p>
Mid and West Berkshire Local Access Forum (lpr1859)	<p>This policy mentions registered parks and gardens, but not registered commons. MWBLAF believes that greater emphasis should be given to the West Berkshire Commons in the Local Plan; they are mentioned but briefly under Green Infrastructure. It should be borne in mind that many of the Commons in West Berkshire are registered under the 1899 Commons Act, e.g. Bucklebury, Snelsmore, Padworth, Wokefield. Others registered under different Acts of Parliament include Stroud Green, Greenham &amp; Crookham, West Ilsley, East Ilsley and Oare. Hungerford Common is in particular a historic asset dating back centuries These are all historically registered commons, are protected by law and a much-valued resource. They all have public access rights and several have equestrian rights that are important for the equestrian community. The Ridgeway is mentioned as a historic transport route but the Ridgeway is just one of the many historic drover's roads throughout West Berks which and are now part of the current public rights of way network. These routes are an historic asset, recorded in the</p>	<p>Comments noted.</p> <p>Registered commons and historic public rights of way would be considered under criterion g) of the policy.</p> <p>Amend criterion g) of the policy as follows – '.... or through the development management <u>or other planning processes</u>.'</p> <p>In the supporting text add bullet points to the end of paragraph 5.46 of the Emerging Draft LPR as follows –</p> <ul style="list-style-type: none"> <li>• <u>Registered commons</u></li> <li>• <u>Historic Public Rights of Way</u></li> </ul>



Respondent (with lpr ref)	Response	Council Response
	<p>Inclosure awards of the 18th century and reflect how our forefathers travelled through the area. We strongly suggest that these are mentioned as the historic asset they are. They allow people today to access historic features and explore and understand our heritage and the countryside today. They are protected by law but are at risk from present day agricultural practices which can remove ancient hedgerows, change the surface and nature of the way thus changing the nature of the environment. They need better protection.</p> <p>In the Policy, the Forum recommends adding to the list below the first paragraph:</p> <ol style="list-style-type: none"> <li>1. <u>f) Registered Commons;</u></li> <li>2. <u>g) Historic Public Rights of Way (and renumber following items)</u></li> </ol> <p>In paragraph 5.52 of the Sporting text, add examples of drove roads: ‘The historic environment belongs to the whole community and everyone should be able to participate in sustaining this shared resource. One mechanism for achieving this is through the West Berkshire Heritage Forum, a partnership established in 2009 to recognise, promote and protect the District’s heritage. The West Berkshire Historic Environment Action Plan (HEAP), published by the West Berkshire Heritage Forum, describes the character and evolution of the area as a whole and identifies its significant historic components. These include Mesolithic sites in the Kennet Valley; transport routes such as the Ridgeway <u>and many other old drove roads such as Old Street and Green Hams Lane which connect the Newbury area to the Ridgeway</u>, the Kennet and Avon Canal and the Great Western Railway.....’</p>	<p>Amend para 5.52 of the Emerging Draft LPR as follows - These include Mesolithic sites in the Kennet Valley; transport routes such as the Ridgeway <u>and other old drove roads</u>, the Kennet and Avon Canal and the Great Western Railway....</p>
Newbury Society (lpr1151)	<p>Conservation Area Appraisals. The emerging draft makes no commitment to the completion of any conservation area appraisals by 2037. West Berkshire has 53 conservation areas, introduced from 1970 onwards, yet 51 of them do not have the formal appraisals needed to protect them. This includes all of the Newbury conservation areas, such as one which includes most of Newbury town centre, and two more along the canal. The Local Plan should include an unequivocal commitment to the completion of a specific number of appraisals.</p>	<p>Comments noted.</p> <p>The Council recognises the importance of CAAs and is undertaking an active programme of CAAs as part of its strategy for the conservation and enjoyment of the historic environment. In 2019 funding was obtained to establish a prioritisation methodology to identify those Conservation Areas (CAs) within West Berkshire that are under the greatest level of pressure from development and which have been subject to the greatest level of change. A</p>

Respondent (with lpr ref)	Response	Council Response
		<p>priority list of all CAs was drawn up which forms the basis for a proposed phased programme of reviews up to July 2026, subject to resources. Phase 1, which sets out the top ten CAs most in need of review, includes the larger and more complex areas. The CAA for Newbury town centre is due to be complete in 2023 and CAAs for Thatcham and Hungerford will follow. Monitoring of the CAA review programme will be undertaken through the Council's Annual Monitoring Report (AMR).</p> <p>Amend the supporting text to Policy DM8 as follows – 'The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the District's 53 Conservation Areas. As part of this duty <u>and as part of its strategy to maximise opportunities for the conservation and enjoyment of the historic environment</u> the Council is undertaking a <u>project phased programme of Conservation Area Appraisals (CAAs)</u>, in partnership with the West Berkshire Heritage Forum <del>to encourage community involvement in their review and adoption of further Conservation Area Appraisals.</del> <u>As well as helping to define what is special about a particular Conservation Area,</u> <del>The</del> project will provide local communities with an understanding of how and why Conservation Area status is appraised, designated, and applied in future development and conservation management decisions....'</p>
West Berkshire Green Party (lpr1832)	We broadly support his policy	Comments noted
West Berkshire Heritage Forum (lpr73)	Supports the policy. This comprehensive policy should also make specific reference to the conservation of the principal public open spaces such as Victoria Park and Goldwell Park, in order to protect them against further encroachment. We should not need to wait until they are locally listed.	Comments noted. There are a lot of historic assets in the District and unfortunately it is not practical to specifically mention them all. The policy should be read in conjunction with other policies in the LPR, including SP10 Green Infrastructure which sets

Respondent (with lpr ref)	Response	Council Response
	<p>On the same argument, it should also mention the Commons, not just Greenham and Crookham Commons, but also the other Commons across West Berkshire which have both historic and environmental importance.</p> <p>5.42 Victoria Park and Goldwell Park, and Greenham and Crookham Common, should be added.</p> <p>5.43 West Berks Council might consider delegating the Section 215 process in whole or part to the larger Town Councils. Newbury Town Council maintains and regularly reviews a record of properties at risk. The Heritage Forum is happy to continue its involvement.</p> <p>5.51 Dated references should be given to the Historic Landscape Characterisation, Historic Environment Character Zoning, and the Newbury Historic Character Study. We are only aware of the last of these.</p>	<p>out the Council's approach to the protection and enhancement of public parks such as Victoria Park and Goldwell Park.</p> <p>In the supporting text add a bullet point to the end of paragraph 5.46 of the Emerging Draft LPR as follows –</p> <ul style="list-style-type: none"> <li>• <u>Registered commons</u></li> </ul> <p>The request to delegate Section 215 notices is noted but is a matter that would need to be considered separately to the LPR.</p> <p>Amend paragraph 5.51 of the Emerging Draft LPR as follows – '...Historic Landscape Characterisation (<u>2007</u>), Historic Environment Character Zoning (<u>2007</u>)..... and the Newbury Historic Character Study (<u>2006</u>).</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr290)	It has always been a huge disappointment to us that Membury airfield has not been historically conserved. Much could be done to maintain the integrity of the hangars and site buildings. If these were kept in good order, they would provide fantastic office spaces. The site is being overwhelmed by the new which is destroying its character. Large scale development is not appropriate here - the infrastructure cannot support it.	Comments noted. The issues raised are specific to Membury Industrial Estate and so will be considered as part of the Council's response to Policy SP21.
Tim Hall (lpr647)	Supports the policy	Comments noted
David Hill (lpr712)	Whilst the need to protect heritage assets is acknowledged, it must also recognise a need for properties to be made more energy efficient. Listed building protection conflicts with energy efficiency. Priority for SP9 should be given to key heritage assets (Scheduled monuments and sites of national importance) but should be flexible enough to allow working or living listed buildings to be adapted to become more energy efficient whilst protecting the character of the building. The Listed	Comments noted. Policy SP5 Responding to Climate Change already includes the following criterion 'to manage the integrity of the historic environment and to respect the character and improve the environmental performance of heritage assets without compromising their significance, by adopting principles of reversibility and minimum intervention in accordance with Policy SP9.'

Respondent (with lpr ref)	Response	Council Response
	Building Control system is not fit for purpose and should align with the need for improved energy standards.	<p>The supporting text of Policy SP9, para 5.49 of the Emerging Draft LPR states - 'Heritage assets rarely prevent development schemes where their significance has been properly assessed and understood from the outset. Indeed, the most successful schemes often arise from this understanding and an appreciation of the social, cultural, economic, and environmental value that can be gained from their retention, sympathetic re-use and successful integration. Preserving embodied energy through the re-use and adaption of existing historic buildings for example, can be more sustainable than constructing new buildings. Proposals for energy saving measures should be designed with the knowledge and understanding of the building's significance. Getting the balance right and avoiding unintended consequences, is best done with a holistic 'whole building' approach. This helps to highlight and resolve uncertainties and reconcile conflicting aims, ensuring that energy efficient measures are suitable, robust, well integrated, properly coordinated and sustainable.'</p> <p>Amend para 5.49 of the Emerging Draft LPR as follows – 'Getting the balance right and avoiding unintended consequences, is best done with a holistic 'whole building' approach <u>in accordance with the current guidance from Historic England.</u>'</p>
Nataliya Topliss (lpr800)	<p>Thattham area has never been enhanced by the housing developments. It always results in green places been destroyed and mature trees and greenery cut. Please come to Thattham and see all unsightly new developments built one on top of another with no regard to the town's character and heritage.</p> <p>West Berks Council's strategy of 2012 indentified, that after a period of rapid housing growth, infrastructure in Thattham had failed to keep pace and there should be a period for regeneration and new facilities. Since then,</p>	Comments noted. The issues raised are specific to North East Thattham and so will be considered as part of the Council's response to Policy SP17.

Respondent (with lpr ref)	Response	Council Response
	there has been no such regeneration so the Council's conclusions of 2012 must still stand.	
Councillor Tony Vickers (lpr535)	We support this policy but would like to add another category of heritage: historic routes. West Berkshire has a relatively high number and mileage of public rights of way. Most of them are vestiges of a past way of life and have a very different function now compared with the one which they were created by previous generations: as drove roads or coaching routes, for example. They may be protected as rights of way under Highways legislation but they should also be protected. Add in after areas: historic routes.	<p>Historic public rights of way would be considered under criterion g) of the policy.</p> <p>Amend criterion g) of the policy as follows – ‘.... or through the development management <u>or other planning processes.</u>’</p> <p>In the supporting text add a bullet point to the end of paragraph 5.46 of the Emerging Draft LPR as follows –</p> <ul style="list-style-type: none"> <li>• <u>Historic public rights of way</u></li> </ul>
<b>Landowners, site promoters and developers</b>		
Barton Willmore for Copas Farms (lpr1970)	<p>Draft policy SP9 states “<i>Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.</i>”</p> <p>This does not accord with paragraph 197 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a ‘<i>balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset</i>’. On this basis we consider that the existing wording of the policy is not consistent with national policy and should be revised as follows (in bold and underlined):</p> <p><i>Development which would harm the significance of a non-designated heritage asset or its setting will <b><u>only not be permitted, on the basis of a balanced judgement having regard to the scale of any harm or loss and the significance of the asset.</u></b> <del>unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.</del></i></p>	<p>Comments noted.</p> <p>Amend the policy as follows –</p> <p><del>‘Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.’</del></p> <p><u>‘Where development would affect the significance of a non-designated heritage asset a balanced judgement will be made which has regard to the scale of any harm or loss and the significance of the heritage asset.’</u></p>
Barton Willmore for Donnington Valley Group (lpr2433)	Part of the policy is inconsistent with National Planning Policy. Emerging Policy SP 9 (Historic Environment) includes the following: “Development which would harm the significance of a non-designated heritage asset or its	<p>Comments noted.</p> <p>Amend the policy as follows –</p>

Respondent (with lpr ref)	Response	Council Response
	<p>setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.”</p> <p>This does not accord with paragraph 197 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a ‘balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset’. On this basis we consider that the existing wording of the policy is not consistent with national policy and should be revised as follows:</p> <p><i>Development which would harm the significance of a non-designated heritage asset or its setting will <b>only not</b> be permitted, <b>on the basis of a balanced judgement having regard to the scale of any harm or loss and the significance of the asset.</b> unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.</i></p>	<p><del>‘Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.’</del></p> <p><u>‘Where development would affect the significance of a non-designated heritage asset a balanced judgement will be made which has regard to the scale of any harm or loss and the significance of the heritage asset.’</u></p>
<p>Barton Willmore for Sulham Estate (lpr2436)</p>	<p>Part of the policy is inconsistent with National Planning Policy. Emerging Policy SP 9 (Historic Environment) includes the following: “Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.”</p> <p>This does not accord with paragraph 197 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a ‘balanced judgement [...] having regard to the scale of any harm or loss and the significance of the heritage asset’. On this basis we consider that the existing wording of the policy is not consistent with national policy and should be revised as follows:</p> <p><i>Development which would harm the significance of a non-designated heritage asset or its setting will <b>only not</b> be permitted, <b>on the basis of a balanced judgement having regard to the scale of any harm or loss and the significance of the asset.</b> unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.</i></p>	<p>Comments noted.</p> <p>Amend the policy as follows –</p> <p><del>‘Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.’</del></p> <p><u>‘Where development would affect the significance of a non-designated heritage asset a balanced judgement will be made which has regard to the scale of any harm or loss and the significance of the heritage asset.’</u></p>

Respondent (with lpr ref)	Response	Council Response
Fowler Architecture and Planning (lpr1789)	<p>There is no reference to 'setting' within (a) to (g). The following requirement goes beyond paragraph 197 of the NPPF: 'Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.' The NPPF requires only a 'balanced judgement' and this does not rely upon public benefits being necessary for this balance to be struck in favour of the scheme. The Local Plan must not treat non-designated heritage assets under paragraph 196 of the NPPF, which is what it is seeking to do.</p>	<p>Comments noted.</p> <p>Amend the policy as follows – 'All proposals affecting a heritage asset, <u>including its setting</u>, should.....'</p> <p>Amend the policy as follows –  <del>'Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.'</del>  <u>'Where development would affect the significance of a non-designated heritage asset a balanced judgement will be made which has regard to the scale of any harm or loss and the significance of the heritage asset.'</u></p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: SP10 Green Infrastructure****(Proposed Submission LPR Policy: SP10 Green Infrastructure)**

Number of responses received: 34

Respondent	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr740)	<p>Why not actually include the phrase blue infrastructure under SP10? Mentioned briefly under SP5 and SP23, but could be clearer here.</p> <p>Suggest that the bullet points beneath Proposals for GI will be encouraged to include 'Restore and open up historic route ways such as hollow ways and drovers roads, avenues and access to historic parks'.</p> <p>Para 5.55 examples are practically all also historic landscape character types - woodland, parkland, gardens, village greens, allotments, cemeteries, canals, etc. have been created by people and could equally be classified as 'archaeological or historic' rather than having this as a separate category. SP10 is an example where cross-referencing between SP policies would make sense to pull them together, either in the body of each policy (eg in accordance with policy SP9) or in a table in an appendix.</p>	<p>Comments noted.</p> <p>For consistency, the Council is using the definition of Green Infrastructure (GI) which is set out in the NPPF. This refers to GI as 'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.'</p> <p>Add the following text as a separate bullet point in the policy – <u>'restore and open up historic route ways such as hollow ways and drovers roads, avenues and access to historic parks'</u></p>
Tree Officer, West Berkshire Council (lpr1612)	<p>I note that Policy SP10 GI lists certain types of environment where trees occur. I would suggest it includes a bullet specifying:</p> <ul style="list-style-type: none"> <li>• Trees under preservation orders and within conservation areas and those in local and nationally designated sites;</li> <li>• Veteran trees – important in their own right and for their rare and vulnerable ecology.</li> </ul>	<p>Comments noted.</p> <p>These suggested bullet points mainly relate more to regulatory protection and conservation of natural features than to green infrastructure per se. They will be addressed</p>



Respondent	Response	Council Response
		<p>under Proposed Submission LPR Policies SP11 and DM15.</p> <p>Amend 3<sup>rd</sup> bullet of para 5.55 as follows –  ‘....., living roofs and walls, <u>trees and hedgerows</u> hedges, civic spaces....’</p>
<p>Ecologist, West Berkshire Council (lpr1692)</p>	<p>Depending on their location, nature and scale, all development proposals will:</p> <ul style="list-style-type: none"> <li>• protect or <u>and</u> enhance existing GI and the functions this performs, and</li> </ul> <p>Proposals for GI will be encouraged where they:</p> <ul style="list-style-type: none"> <li>• help to mitigate the causes of and address the impacts of climate change through measures such as sustainable drainage, minimalizing urban heating, flood risk management, and maximise GI to sequester carbon and provide <u>environmental</u> cooling and insulation functions;</li> </ul> <p>Long term - should be specified to be a minimum of 25-30 years</p> <p>Management arrangements for new and enhanced green infrastructure within major development sites <u>with quality/compliance checks at set intervals to meet BNG targets.</u></p> <p>5.54 Add a point for river renaturalisation seeking to slow flows of water particularly in the upper parts of catchments.</p> <p>5.55 Examples of GI assets include:</p> <ul style="list-style-type: none"> <li>• Natural and semi-natural rural and urban green <u>blue</u> spaces – ....., lakes and ponds need to be added</li> <li>• Amenity green space – Do public rights of way and bridleways need to be added here?</li> </ul> <p>5.56 Insulation isn't only about winter also about keeping cooler in the summer too.</p> <p>Maximising <u>...and extenuating...</u> the number of functions and benefits delivered by each GI asset;</p>	<p>Comments noted.</p> <p>Amend policy as follows – ‘protect <u>and/or</u> enhance existing GI... sequester carbon and provide <u>environmental</u> cooling and insulation functions’</p> <p>With the introduction of the Environment Act 2021, Biodiversity Net Gain will be considered under Policy SP11 Biodiversity and Geodiversity.</p> <p>This is a nature conservation issue and not directly appropriate for this policy.</p> <p>Amend 1<sup>st</sup> bullet point of para 5.55 as follows – ‘urban green <u>and blue</u> spaces....’</p> <p>For consistency, the Council is using the definition of Green Infrastructure (GI) which is set out in the NPPF. This refers to GI as ‘a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.</p> <p>Public rights of way are included under bullet point 6 of the Emerging Draft LPR.</p>

Respondent	Response	Council Response
<b>Statutory consultees</b>		
<p>Natural England (lpr1596)</p>	<p>Natural England welcome this policy. We are currently leading the Green Infrastructure Standards Project; a vital contribution to delivery of the Government's 25 Year Environment Plan. It is due to be launched in June 2021. Research within the project has identified key benchmarks that are informing the update of the Accessible Natural Greenspace Standards. This may be useful to inform design of Green Infrastructure across your area.</p> <p>In addition, we would like to see reference to well-designed SUDS as a general requirement, as well as for protecting and enhancing the SSSI/SAC rivers and wetlands within West Berkshire. This would probably sit best within Policy SP10 as opposed to SP6, and should reference the need to protect the rivers and residents from flooding, pollution run off and discharge impacts.</p>	<p>Comments noted.</p> <p>Insert a new paragraph after 5.55 of the Emerging Draft LPR as follows -</p> <p><u>'The government's 25 Year Environment Plan (2018) highlights that 'The provision of more and better quality green infrastructure, including urban trees, will make towns and cities attractive places to live and work, and bring about key long term improvements in people's health'. The document makes a commitment to the production of a GI Framework, <a href="#">Green Infrastructure Framework</a> currently being produced by Natural England, which will help to target the creation and/or improvement of GI across the District. The Framework complements Biodiversity Net Gain (BNG) and Nature Recovery Strategies which both form part of the Environment Act (2021). To ensure high quality multi-functional GI is delivered in West Berkshire as set out in the policy, development proposals will be expected to be designed having regard to the Natural England Framework, and any future relevant national regional or local guidance which could be brought forward. Proposals will be supported which use the most up to up to date recognised GI principles and standards. For example, The Building with Nature Standards developed by the Natural Environment Research Council (NERC) or the emerging Natural England Green Infrastructure Standards. In addition, if a development falls under BREEAM, consideration of Land Use and Ecology Credits should be undertaken at the design stage to ensure the requirements of Policy DM4 Building Sustainable Homes and Businesses is met.'</u></p> <p>SuD's are included in the penultimate bullet point of paragraph 5.55 of the Emerging Draft LPR.</p>

Respondent	Response	Council Response
		The protection and enhancement of SSSI's/SACs are covered in Policy SP11 Biodiversity and Geodiversity.
Environment Agency (lpr1661)	<p>We welcome the inclusion of this policy and the examples given of the many benefits of different Green Infrastructure measures. The policy wording should be strengthened: Delete 'where appropriate' because major developments should provide long term management of GI. This will ensure that major developments take into account risks arising from climate change can be managed through suitable adaptation measures in accordance with paragraph 150 of the NPPF <i>"Where appropriate, proposals must provide for long-term management arrangements for new and enhanced green infrastructure within major development sites."</i></p> <p><u>Supporting Text</u></p> <ul style="list-style-type: none"> <li>• 'Forming buffers and wildlife corridors for key habitats and species'. We recommend referring to Policy SP 11 that expands on the need for buffer zones. Also we recommend altering 'buffers' to 'buffer zones', to provide greater</li> <li>• Please add 'The Environment Agency' to the list of organisations that the council will work in partnership with for</li> </ul>	<p>Comments noted.</p> <p>Amend the 6<sup>th</sup> paragraph of the policy as follows – <del>'Where appropriate, proposals must provide for long-term management arrangements for new and enhanced green infrastructure within major development sites. Proposals for major development will be required to consider the long-term management and maintenance of GI infrastructure and should clearly demonstrate how these considerations have informed site proposals. Details of maintenance requirements and arrangements will be required to be set out, including who is responsible for these requirements. Appropriate funding arrangements for delivery of the long-term maintenance requirements should be clearly demonstrated to the Council before construction starts, including measures to secure biodiversity net gain through all phases and stages of the development.'</del></p> <p>Amend 3<sup>rd</sup> bullet point of paragraph 5.56 of the Emerging Draft LPR as follows – 'Forming buffers <u>zones</u> and .....</p> <p>Amend paragraph 5.57 of the Emerging Draft LPR as follows – '.....local community, <u>statutory advisors</u>,.....'</p>
Thatcham Town Council (lpr1397)	<ul style="list-style-type: none"> <li>• "Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment and the health and wellbeing of the community."</li> </ul> <p>As noted in SP 8, with regards to the Thatcham NE site, the existing landscape is agricultural and countryside interspersed with well-maintained and historic hedgerows, a scattering of ancient trees, and bounded by well-established woodland or hedgerows. These natural landscape features</p>	<p>Comments noted.</p> <p>Comments in relation to Policy SP17 will be considered as part of the Council's response under that policy.</p> <p>The Local Plan also includes of the Emerging Draft LPR policies DC14 Trees, Woodland and Hedgerows and SP11 Biodiversity and Geodiversity which will be utilised as part of the planning process.</p>

Respondent	Response	Council Response
	<p>provide the countryside feel towards the edge of the existing settlement and define the countryside landscape beyond.</p> <p>Historic hedgerows are valuable to the ecology of an area and support a wide range of biodiversity and wildlife. It is not possible to remove a historic hedgerow and claim a substitution of biodiversity elsewhere as the ecology may have developed over many decades, or hundreds of years.</p> <p>The natural landscape, and hedgerows provide wildlife corridors that support diverse wildlife in the remaining Ancient Woodland (The Plantation). The proposed site would encircle the remaining woodland and break the connection to the countryside.</p> <p>The proposed site of Thatcham NE would also hinder access to the countryside as it would subsume existing rights-of-way.</p> <p>We note that during the HELAA assessment the Thatcham NE carried a "High risk of adverse nature conservation impacts" due to "Areas of ancient woodland and Local Wildlife Sites adjacent to the site".</p> <p>The selection of Thatcham NE, being rural and countryside, is in conflict with the policy statement that is in the benefit of the natural environment. Nor is the selection aligned with the well-being for existing Thatcham residents.</p> <p>The conflict between the NE Thatcham site selection and the policy needs to be resolved.</p>	<p>Green infrastructure plays an important role in supporting habitat connectivity and this will be incorporated into the revised policy by amending the 7<sup>th</sup> bullet of the Emerging Draft LPR as follows – ‘...extend wildlife corridors <u>and provide habitat connectivity</u>, particularly...’</p> <p>The Council recognises the benefits that the public rights of way network has environmentally but also alongside this it aids well-being in terms of both physical and mental health. Public rights of way fall under separate legislation which means that highway authorities have a general duty ‘to assert and protect the rights of the public to the use and enjoyment’. In addition the West Berkshire Council Public Rights of Way Improvement Plan will be utilised to inform development proposals and forms part of the evidence base for the Local Plan.</p> <p>Strengthen the policy by adding an additional paragraph as follows –  <u>‘Development proposals must take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new connections and status upgrades to the existing rights of way network will be supported.’</u></p> <p>Policies contained within the Local Plan require that the necessary surveys are carried out and any corridors needed for wildlife are retained.</p>
Newbury Town Council (lpr2263)	We strongly support this policy. However, we wish to have more support for allotments here.	Comments noted

Respondent	Response	Council Response
	<p><b>Reason:</b> Developments in urban areas such as Newbury’s settlement area need to make specific provision for allotments at the earliest stage, in consultation with local councils which have statutory responsibility for providing them but have great difficulty finding land for them. In Newbury, there is currently a large waiting list for plots, and we believe the demand for allotments can only continue to grow as housing densities have increased in recent decades while we now see support for reducing “food miles” and the health and biodiversity value of allotments over that of some other forms of green infrastructure. Housing developments of more than 100 dwellings with densities greater than 30 should be required to make specific on-site provision for allotments according to the needs of surveys of demand carried out in partnership with surrounding parishes, or to contribute a financial contribution towards off-site provision. All other housing developments should contribute through the parish component of CIL. Allotment should not be taken as public open space. Rather they should be seen as an addition to public open space (see in the DC 37).</p> <p><b>Change proposed:</b> In the supporting text, we wish to see a paragraph that reflects the above</p>	<p>Allotments would be recognised by this policy and are included in the examples of GI assets in the supporting text.</p> <p>The provision of the most appropriate GI will vary in type and scale from site to site. The Council wishes to retain the flexibility to agree the best solutions with the developers rather than set out a detailed set of specification for all possible types of GI.</p>
Cold Ash Parish Council (lpr1735)	Policy is supported.	Comment noted.
Greenham Parish Council (Clerk) (lpr898)	<p>Policy is supported.</p> <p>Developments in Greenham need to make specific provision for allotments at the earliest stage, in consultation with local councils which have statutory responsibility for providing them but have great difficulty finding land for them.</p>	Comments noted.
Stratfield Mortimer Parish Council (lpr399)	Policy is supported.	Comment noted.
Shaw-cum-Donnington Parish Council	We support the policy.	Comments noted.

Respondent	Response	Council Response
(lpr204)	<p>What is meant in bullet 2 “create additional green infrastructure which is integrated into the overall development design from the outset”. It could mean anything from planting a couple of trees to providing wide swaths of open space.</p> <p>In bullet 3 it states “take opportunities to achieve multi functionality by bringing Green Infrastructure functions together”. What does this mean in plain English?</p> <p>The objectives are laudable. Can they be met in the face of developers with their need to maintain profits with high density developments and only achieving minimum building regulations?</p> <p>5.55 We note that church yards are regarded as green infrastructure. Many are in a dilapidated condition due to lack of maintenance and lack of resources. This leads to a loss of historic assets as monuments crumble.</p> <p>We would like the maintenance of assets to be listed in section 5.56.</p>	<p>The Council is committed to achieving high quality multifunctional green infrastructure assets. To overcome concerns raised in regards to policy ambiguity the 5th bullet point of the Emerging Draft LPR will be amended as follows –</p> <p><u>‘Create Generate high quality GI which creates an attractive and distinctive setting to new development, enhancing any existing asset that may be present. This should be planned and designed from the outset as a network of multifunctional green and blue spaces and other natural features which identify and respond to the site’s local context. Proposals for GI will be expected to be designed in accordance with the most up to date recognised GI standards;’</u></p> <p>The range of functions are set out in the policy and examples are included in the supporting text.</p> <p>The policy will provide an opportunity to address such circumstances if accepted as a priority.</p> <p>Amend the policy as follows –</p> <p><u>‘Where appropriate, proposals must provide for long-term management arrangements for new and enhanced green infrastructure within major development sites.–Proposals for major development will be required to consider the long-term management and maintenance of GI infrastructure and should clearly demonstrate how these considerations have informed site proposals. Details of maintenance requirements and arrangements will be required to set out, including who is responsible for these requirements. Appropriate funding arrangements for delivery of the long-term maintenance requirements should be clearly demonstrated to the Council before construction starts, including measures to secure biodiversity net gain through all phases and stages of the development.’</u></p>

Respondent	Response	Council Response
Hungerford Town Council (lpr148)	Policy is supported. No further comments.	Comments noted.
<b>General consultation bodies</b>		
BBOWT (lpr713)	<p>Policy is supported but strengthening wanted.</p> <p>BBOWT welcome the proposed inclusion of a policy on Green Infrastructure to benefit biodiversity.</p> <p>BBOWT would like to see the wording on how GI can benefit biodiversity strengthened and suggest the following wording:</p> <ul style="list-style-type: none"> <li>• Green Infrastructure is expected to positively contribute to the conservation, restoration, re-creation and enhancement of networks of biodiversity on a landscape scale. The size and location of GI is expected to be suitable for the function it is intended to fulfil. Where required, GI should ensure permeability for wildlife through development and provide sufficient beneficial habitat to support target species, independent of its connective function.</li> <li>• Monitoring of GI and habitat creation to ensure that it develops in accordance with its stated intention, will be expected. If it is not achieving satisfactory condition within stipulated timeframes, remedial measures will be required. Mechanisms to achieve this must be outlined in development proposals.</li> </ul>	<p>Comments noted.</p> <p>The policy is designed to provide for the range of green infrastructure functions. It is not appropriate to specify in detail at this level all the stipulations that may apply to each stage. Detail as suggested would be more effective at planning application stage.</p> <p>Amend penultimate paragraph of the policy as follows – <del>'Where appropriate, proposals must provide for long-term management arrangements for new and enhanced green infrastructure within major development sites. Proposals for major development will be required to consider the long-term management and maintenance of GI infrastructure and should clearly demonstrate how these considerations have informed site proposals. Details of maintenance requirements and arrangements will be required to set out, including who is responsible for these requirements. Appropriate funding arrangements for delivery of the long-term maintenance requirements should be clearly demonstrated to the Council before construction starts, including measures to secure biodiversity net gain through all phases and stages of the development.'</del></p>
North Wessex Downs AONB (lpr1625)	<p>Policy is supported.</p> <p>This will act as the back bone of developments linking all areas together in creating a sense of place.</p> <p>Biodiversity net gain has been included but this policy presents the opportunity to include natural capital within it as well.</p>	<p>Comments noted.</p> <p>Since the Plan was consulted upon the Environment Act 2021 has become law. As such the requirement for Biodiversity Net Gain will be included in Policy SP11.</p>

Respondent	Response	Council Response
		<p>Amend the 7<sup>th</sup> bullet point of the Emerging Draft LPR policy as follows –  <del>'contribute to biodiversity net gain</del> <u>enhance the natural environment and natural processes to improve biodiversity and increase natural capital whilst and seeking opportunities to use GI to extend wildlife corridors and provide habitat connectivity</u>, particularly in urban areas and where it contributes to nature recovery networks;'</p>
The Woodland Trust (lpr1009)	<p>We support this approach to protecting and extending Green Infrastructure, as part of wider net gain and biodiversity policies. We welcome the inclusion of green infrastructure as part of essential infrastructure and connectivity and urge a landscape-scale approach to maximise the benefits for nature and people.</p> <p>Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.</p> <p>In particular, we note the importance of protecting and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape. The consequent increase in ecological connectivity between areas of ancient woodland will create the resilient landscapes recommended in Making Space for Nature (Defra 2010).</p> <p>In each type of area, green infrastructure should be protected, enhanced and integrated into development plans, including through local tree strategies, landscape management plans or urban development briefs. To achieve ongoing benefits, green infrastructure needs to be protected and maintained. CIL allocations should include green infrastructure, including management plans and funding for maintenance. Natural green infrastructure is cost-effective: for example, trees cost less to maintain than regularly-mown turf and have wider biodiversity benefits.</p>	<p>Comments noted.</p> <p>The policy will be read in conjunction with other policies in the Plan such as Emerging Draft LPR Policy DC14 which covers trees, woodland and hedgerows.</p> <p>Amend 4<sup>th</sup> bullet of the Emerging Draft LPR policy as follows – '<u>...extend wildlife corridors and provide habitat connectivity, particularly...</u>'</p> <p>Amend penultimate paragraph of the policy as follows – '<del>Where appropriate, proposals must provide for long-term management arrangements for new and enhanced green infrastructure within major development sites.</del> <u>Proposals for major development will be required to consider the long-term management and maintenance of GI infrastructure and should clearly demonstrate how these considerations have informed site proposals. Details of maintenance requirements and arrangements will be required to set out, including who is responsible for these requirements. Appropriate funding arrangements for delivery of the long-term maintenance requirements should be clearly demonstrated to the Council before construction starts, including measures to secure biodiversity net gain through all phases and stages of the development.</u>'</p>
Canals and Rivers Trust	The Trust fully support this policy and we have been promoting the waterway corridor as one of the most important GI corridors throughout the	Comments noted and partnership working is welcomed.



Respondent	Response	Council Response
(lpr878)	<p>district. We ask for an amendment that ‘Green-blue corridors rivers and canals (including their banks and towpaths)...’</p> <p>The Trust look forward to involvement in the latest IDP update. We have not yet been contacted for input to date, however as always we wish to promote towpath improvement and improved linkages to the towpath throughout the district through the IDP, Local Transport plan, ROWIP and any local cycling and walking improvement plans.</p> <p>The towpath is well used for local walking and cycling and parts of it are including in the route of NCN4. The Trust will work with the council and other partners, including Sustrans to seek improvements and funding opportunities to achieve improvements to the towpath for walking and cycling whilst remembering that it is a multi-functional GI asset.</p> <p>Para 5.56 should include improving existing GI assets</p>	<p>Amend 6<sup>th</sup> bullet point of the Emerging Draft LPR paragraph 5.55 as follows – ‘...rivers and canals (including their banks <u>and towpaths</u>),...’</p> <p>The first paragraph of the policy refers to the enhancement of existing GI assets.</p>
Heritage Forum (lpr74)	<p>Policy is supported.</p> <p>5.55 GI assets include also:</p> <ul style="list-style-type: none"> <li>• Victoria Park, Goldwell Park, and other principal public parks;</li> <li>• Greenham and Crookham Common and other Commons across West Berkshire;</li> <li>• Ancient woodland, which should be surveyed and recorded if that has not already happened.</li> </ul>	Comments noted.
Mid and West Berkshire Local Access Forum (lpr1894)	<p>MWBLAF is disappointed that there is a specific policy on Public Rights of Way in the Minerals and Waste Local Plan, but not in the draft Local Plan. The Forum firmly believes that Public Rights of Way are equally important to both policies.</p> <p>The Forum therefore offers a proposal for a policy on Public Rights of Way for inclusion in the Local Plan. This is based closely on the Policy 23 in the Minerals and Waste Local Plan and clauses in policies RSA 3 and RSA 21 in this draft Local Plan.</p> <p>The Forum recommends that a policy on Public Rights of Way is added to the Local Plan: <b>Public Rights of Way</b></p>	<p>Comments noted.</p> <p>The Council recognises the benefits that the public rights of way network has environmentally but also alongside this it aids well-being in terms of both physical and mental health. The Council has considered the inclusion of a standalone policy on public rights of way but feels there is adequate legislation for rights of way outside of the Local Plan process. In addition the West Berkshire Council Public Rights of Way Improvement Plan which is currently being updated will be utilised to inform development proposals and forms part of the evidence base for the</p>

Respondent	Response	Council Response
	<p>Development proposals will be permitted where the proposals do not adversely affect the Public Right of Way (PROW) network and, where possible, enhance it. When considering the adverse impacts consideration will be given to whether:</p> <ul style="list-style-type: none"> <li>• The proposal maintains the character of the PROWs within the development or adjacent to it;</li> <li>• The proposal maintains the existing route during construction or, when this is impossible, propose an acceptable alternative route;</li> <li>• PROW should be reinstated as soon as is practicable; and</li> <li>• Opportunities are proposed that would secure appropriate, improved access, to the countryside.</li> </ul> <p><b>Supporting Text</b></p> <p>There are 1183 km (735 miles) of public rights of way in West Berkshire, compared to a Council road network of 1272 km (790 miles). Public rights of way are made up of the following:</p> <ul style="list-style-type: none"> <li>• 61% public footpaths, over which the right of way is on foot only.</li> <li>• 17% public bridleways, for use by the public on foot, bicycle and on horseback or leading a horse.</li> <li>• 8% restricted byways, used as bridleways but with the addition of non-mechanically propelled vehicles, thereby giving a right of access for horse-drawn carriages.</li> <li>• 14% byways open to all traffic, for use by all the above plus vehicular traffic, with the main use being by walkers and horse-riders.</li> </ul> <p>Public Rights of Way play an important role in enabling access to the countryside and the consequential benefits on health and wellbeing. Given the extent of the public rights of way in West Berkshire, proposed development sites will often be close to, or crossed by, rights of way. It is important that rights of way remain accessible to users during the construction of the development, and that users' safety is not compromised by the activity on site. In some circumstances it might be necessary for a right of way to be diverted during the period of construction, but this should be for the minimum possible period and for the least extra distance. Public rights of way within the boundaries of developments should be retained as separate routes for use by the currently permitted classes of</p>	<p>Local Plan. The Council agrees that rights of way have an important role in the green infrastructure network and so will strengthen the policy by adding additional wording to as follows –</p> <p><u>'Development proposals will be required to take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new connections and status upgrades to the existing rights of way network will be supported.'</u></p>

Respondent	Response	Council Response
	<p>user, and should not be ‘absorbed’ into the road network of the development. The rural character of existing Public Rights of Ways across a site should be protected.</p> <p>When determining planning applications consideration will be given to both the impacts of a proposal on the public rights of way network together with the impact on the amenity value of the public right of way.</p> <p>Where appropriate, policies addressing public rights of way may also be applied to other routes used by the public, including ‘other routes with public access’ (as indicated on Ordnance Survey maps), permissive footpaths and bridleways, and established paths on commons and access land (as defined by the Countryside and Rights of Way Act 2000).</p>	
<p>Mid and West Berkshire Local Access Forum (lpr1860)</p>	<p>MWBLAF strongly supports the excellent statement in the policy:</p> <p>Proposals for GI will be encouraged where they: ...</p> <ul style="list-style-type: none"> <li>• can provide pleasant and safe ‘green routes’ to commute on foot, cycle and horseback which help to link parts of urban areas and to the surrounding countryside along blue (water) and green corridors.</li> </ul> <p>It is vital that long term measures are put in place for maintenance and to prevent future development. Using existing legislation for public rights of way and open spaces would ensure that.</p> <p>However, this policy focuses on new green infrastructure that is created through the development; the preservation of existing green infrastructure such as public rights of way (PROW) is not sufficiently addressed. The strong preference of the Forum is for the Local Plan to include a specific policy on PROW, as is the case for the Minerals and Waste Local Plan; we have offered a proposal for this policy at the end of this response. If that is not possible, then the key elements of that proposed policy on PROW would need to be added to this policy.</p> <p>Supporting text:</p>	<p>Comments noted.</p> <p>The Council recognises the benefits that the public rights of way network has environmentally but also alongside this it aids well-being in terms of both physical and mental health. The Council has considered the inclusion of a standalone policy on public rights of way but feels there is adequate legislation for rights of way outside of the Local Plan process. In addition the West Berkshire Council Public Rights of Way Improvement Plan which is currently being updated will be utilised to inform development proposals and forms part of the evidence base for the Local Plan. The Council agrees that rights of way have an important role in the green infrastructure network and so will strengthen the green infrastructure policy by adding additional wording to the 5<sup>th</sup> paragraph of the policy as follows –</p> <p><u>‘Development proposals will be required to take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new</u></p>

Respondent	Response	Council Response
	<p>In paragraph 5.54: Horse riding / horseback is listed in the policy but not mentioned here. This is inconsistent with policy DC34, as horses need safe off-road paths too.</p> <p>In paragraph 5.56: The key to active travel is to provide traffic-free routes which link up without using roads.</p> <p>The Forum suggests adding to the Policy:</p> <p>Where appropriate, proposals must provide for long-term management arrangements for new and enhanced green infrastructure within major development sites. <b><u>Where new paths are created, they should become public rights of way. Where new public open space is created, measures must be taken to ensure they are protected for the future, for example, by becoming registered village greens.</u></b></p> <p>In the Policy, we recommend that ‘commute’ is replaced by ‘travel’, because many journeys are not for commuting but for shopping or recreation: can provide pleasant and safe ‘green routes’ to <b>commute travel</b> on foot, cycle and horseback which help to link parts of urban areas and to the surrounding countryside along blue (water) and green corridors;</p> <p>In paragraph 5.54 of the supporting text, we recommend adding ‘horse riding to the fourth bullet: Para 5.54 encourage walking, cycling, <b>horse riding</b> and other recreational and sensory experiences; In paragraph 5.56 we recommend emphasising the importance of off-road connectivity:</p> <p>Key opportunities include:- Interconnecting GI assets to form a strong GI network of green spaces and corridors which deliver the range of GI functions <b><u>and improve off-road connectivity</u></b></p>	<p><u>connections and status upgrades to the existing rights of way network will be supported.</u></p> <p>Amend 4th bullet point of paragraph 5.54 of the Emerging Draft LPR as follows – ‘encourage walking, cycling, <u>horse riding</u> and other recreational and sensory experiences;’</p> <p>Amend last bullet point of paragraph 5.56 of the Emerging Draft LPR as follows – ‘...range of GI functions <u>and improve off road connectivity;</u>’</p> <p>Amend 6<sup>th</sup> bullet point of the Emerging Draft LPR policy as follows – ‘to commute <u>or travel</u> on....’</p>
British Horse Society (lpr839)	Policy is supported.	Comments noted.

Respondent	Response	Council Response
	<p>We strongly support the excellent statement <i>'can provide pleasant and safe 'green routes' to commute on foot, cycle and horseback which help to link parts of urban areas and to the surrounding countryside along blue (water) and green corridors'</i>. We applaud the inclusion of equestrian needs and this supports policy DC34.</p> <p>Para 5.54: Horse riding / horseback is listed in the policy but not mentioned here. This is inconsistent and leads to problems for BHS officers as (1) they may have to make a case for the inclusion of horses (2) it is inconsistent with policy DC34 as horses need safe off-road paths too.</p> <p>Para 5.56: the key to active travel for equestrians and others is to provide traffic-free routes for all which link up without using roads</p> <p>To the Policy: We recommend that 'commute' is replaced by 'travel' because many journeys are not for commuting but for recreational travel and it is rare for horseback journeys to be for commuting.</p> <p>To the supporting text: Para 5.54 encourage walking, cycling, <b>horse riding</b> and other recreational and sensory experiences</p> <p>5.56 Key opportunities include:- <i>'Interconnecting GI assets to form a strong GI network of green spaces and corridors which deliver the range of GI functions <b>and improve off-road connectivity'</b></i>;</p> <p>We strongly support the excellent statement <i>'can provide pleasant and safe 'green routes' to commute on foot, cycle and horseback which help to link parts of urban areas and to the surrounding countryside along blue (water) and green corridors'</i>. We applaud the inclusion of equestrian needs and this supports policy DC34.</p> <p>Para 5.54: Horse riding / horseback is listed in the policy but not mentioned here. This is inconsistent and leads to problems for BHS officers as (1)</p>	<p>Amend 4<sup>th</sup> bullet point of paragraph 5.54 of the Emerging Draft LPR as follows – 'encourage walking, cycling, <u>horse riding</u> and other recreational and sensory experiences;'</p> <p>Amend last bullet point of paragraph 5.56 of the Emerging Draft LPR as follows – '....range of GI functions <u>and improve off road connectivity</u>;'</p> <p>Amend 6<sup>th</sup> bullet point of the Emerging Draft LPR policy as follows – 'to commute <u>or travel</u> on....'</p>

Respondent	Response	Council Response
	<p>they may have to make a case for the inclusion of horses (2) it is inconsistent with policy DC34 as horses need safe off-road paths too.</p> <p>Para 5.56: the key to active travel for equestrians and others is to provide traffic-free routes for all which link up without using roads.</p>	
West Berkshire Green Exchange (lpr1554)	<p>Policy neither supported nor not supported.</p> <p>All developments of over twenty houses should provide space for allotments at a rate of one ten pole (250 sq. m) allotment for every twenty houses. This can either be on site or nearby preferably within walking distance. Where a site is broken up to avoid this measure the sites broken up should be aggregated together to ensure the provision is met from the developers. Where the allotments are not taken up initially the land should be made available as additional public open space until such time as the land is required for allotments.</p>	Comments noted. The Council welcomes the suggestion regarding allotment provision. The requirements for open space provision is set out in policy DC37 of the Emerging Draft LPR.
West Berkshire Green Party (lpr1833)	We would amend the first sentence as follows: replace “maximise the potential for strengthening” with “strengthen”.	<p>Comments noted.</p> <p>Amend the first paragraph of the policy as follows – ‘The Council will <del>maximise the potential for</del> strengthening both local and strategic Green Infrastructure (GI) <u>assets</u> across the District. <del>Development will protect and</del> <u>This will be achieved by protecting and enhancing</u> <del>enhance</del> existing GI assets and linkages and <u>adding</u> to the local network for the benefit of both the natural environment and the health and wellbeing of the community.....’</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr291)	<p>Policy is supported.</p> <p>We should be developing sites with climate change in mind. Good connectivity with public transport is essential as is the ability for people to take advantage of walking, cycling and riding safely. Areas that cannot provide this should be rejected.</p>	Comments noted.
Tim Hall	Policy not supported.	Comments noted.

Respondent	Response	Council Response
(lpr648)	<p>Delete "maximise the potential".</p> <p>Just say "will strengthen" local and strategic Green Infrastructure (GI) across the District.</p>	<p>Amend the first paragraph of the policy as follows – ‘The Council will <del>maximise the potential for</del> strengthening both local and strategic Green Infrastructure (GI) <u>assets</u> across the District. <del>Development will protect and</del> <u>This will be achieved by protecting and enhancing</u> <del>enhance</del> existing GI assets and linkages and <u>adding</u> to the local network for the benefit of both the natural environment and the health and wellbeing of the community.....’</p>
Nicholas Pflaeger (lpr1195)	<p>Policy not supported.</p> <p>I object to the section which states where a loss of, or negative impact on green infrastructure is unavoidable, development proposals will demonstrate what mitigation measures are proposed. Where provision is not possible financial contribution will be required.</p> <p>I object to the policy component that allows financial payment to mitigate removal of Green Infrastructure</p> <p>Delete the sentence ‘Where provision is not possible financial contributions will be required...’</p> <p>Mitigation should not include the option of financial payment.</p> <p>To the Policy: We recommend that ‘commute’ is replaced by ‘travel’ because many journeys are not for commuting but for recreational travel and it is rare for horseback journeys to be for commuting.</p> <p>To the supporting text: Para 5.54 encourage walking, cycling, <b>horse riding</b> and other recreational and sensory experiences</p> <p>5.56 Key opportunities include:- <i>‘Interconnecting GI assets to form a strong GI network of green spaces and corridors which deliver the range of GI functions <b>and improve off-road connectivity</b>’;</i></p>	<p>Comments noted.</p> <p>It may not be appropriate for every development to provide additional green infrastructure on site and therefore the Local Plan must build in flexibility to allow for off-site delivery, this can lead to the enhancement of existing green infrastructure assets which benefits the wider community.</p> <p>Amend 5<sup>th</sup> paragraph of the Emerging Draft LPR policy as follows – ‘<del>Where a loss of, or negative impact on green infrastructure functionality is unavoidable, development proposals will demonstrate what mitigation measures are proposed and/or replacement green infrastructure will be provided.</del> <u>Proposals involving the loss of green or blue spaces and other natural features will not be supported unless there is no longer a need for the existing infrastructure or an alternative is provided to meet the local needs that is both accessible and of equal or greater quality and benefit to the community.</u> Any replacement or mitigation measure must seek to secure a net gain in lost functionality and be deployed as closely as possible to the affected green infrastructure asset. Where <u>on-site</u> provision is not possible financial contributions will be required and be negotiated on a site by site basis <u>to support the delivery of enhancements or expansion of the GI network through off-site delivery.</u>’</p>

Respondent	Response	Council Response
	<p>We strongly support the excellent statement ‘<i>can provide pleasant and safe ‘green routes’ to commute on foot, cycle and horseback which help to link parts of urban areas and to the surrounding countryside along blue (water) and green corridors’</i>. We applaud the inclusion of equestrian needs and this supports policy DC34.</p> <p>Para 5.54: Horse riding / horseback is listed in the policy but not mentioned here. This is inconsistent and leads to problems for BHS officers as (1) they may have to make a case for the inclusion of horses (2) it is inconsistent with policy DC34 as horses need safe off-road paths too.</p> <p>Para 5.56: the key to active travel for equestrians and others is to provide traffic-free routes for all which link up without using roads</p>	<p>Amend 4<sup>th</sup> bullet point of paragraph 5.54 of the Emerging Draft LPR as follows – ‘encourage walking, cycling, <u>horse riding</u> and other recreational and sensory experiences;’</p> <p>Amend last bullet point of paragraph 5.56 of the Emerging Draft LPR as follows – ‘...range of GI functions <u>and improve off road connectivity</u>;’</p> <p>Amend 6<sup>th</sup> bullet point of the Emerging Draft LPR policy as follows – ‘to commute <u>or travel on</u>....’</p>
Paula Saunderson (lpr 595)	<p>Not strong enough in execution. I see no protection of ancient hedgerows, or green roofing, or vertical planting, or hedgehog highways, or animal under or over passes. You will have to get developers to significantly up their game to hope to make any impact on the proposed concrete jungles that will replace green fields or derelict land or old buildings.</p>	<p>Comments noted. Not all features highlighted in the consultation response would necessarily fall under the remit of green infrastructure and would be more appropriately considered in other policies including Emerging Draft LPR Policies SP5 Climate Change, SP7 Design Principles, SP11 Biodiversity and Geodiversity and DC14 Trees, Woodland and Hedgerows The policies in the Plan will be read as a whole.</p>
Graham Storey (lpr569)	<p>Policy not supported.</p> <p>Not strong enough.</p> <p>I propose the following amendment: “Proposals for GI will be required that strengthen GI” (replacing “designed to maximise the potential for strengthening ...”)</p>	<p>Comments noted.</p> <p>Amend the first paragraph of the policy as follows – ‘The Council will <del>maximise the potential for</del> strengthening both local and strategic Green Infrastructure (GI) <u>assets</u> across the District. <del>Development will protect and</del> This will be <u>achieved by protecting and enhancing</u> <del>enhance</del> existing GI assets and linkages and <u>adding</u> to the local network for the benefit of both the natural environment and the health and wellbeing of the community.....’</p>
Nataliya Topliss (lpr801)	<p>There is always a negative impact on green infrastructure. We have no green infrastructure in Thatcham. West Berks councillor could come to</p>	<p>Comments noted.</p> <p>The aim of Policy SP0 is to ensure high quality multi-functional green infrastructure is delivered across the</p>



Respondent	Response	Council Response
	<p>Thatcham and see that there is no green infrastructure within development sites.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>whole of the District, including in and around Thatcham.</p> <p>This policy will replace the existing Local Plan policies to achieve a better connected green infrastructure network up to 2039.</p> <p>Comments in relation to Policy SP17 will be considered as part of the Council's response under that policy.</p>
Councillor Tony Vickers (lpr536)	<p>We strongly support this policy. However we wish to see more support for allotments here.</p> <p>Hitherto allotments have been seen as part of 'public open space' but they are not 'public' because each plot is rented to a specific resident. If public open space is assigned to become allotment land, it constitutes a loss of public open space even though it remains GI.</p> <p>With the growth of demand for allotments caused by a variety of societal factors (less commuting; more interest in 'food miles'; recognition of the health benefit of gardening and growing food in particular), there is a need for a separate category of GI. Just as other kinds of GI are non-public (private gardens, sports clubs) but recognised in themselves as components to be provided through the Local Plan, we feel that there needs to be 'ring fenced' provision of allotments within the overall GI provision, in conjunction with local councils that have a statutory duty to provide them. Many local councils (e.g. Newbury and Greenham) have long waiting lists of would-be allotmenters and are unable to compete with housing developers for land.</p> <p>Large developments of, say, more than 100 dwellings and with densities greater than about 30dw/ha should have to consult local councils at the earliest stage to establish whether there is a local need and, if so, should be required to set aside land within the site for allotments. All other major (&gt;10dw) housing developments should contribute via the parish component of CIL.</p> <p>We wish to see supporting text that covers the above. Detail of a policy could be in DC 37.</p>	<p>Comments noted, allotments are referenced as a green infrastructure asset within the supporting text. It is agreed that the provision of such open space is better suited in an open space policy.</p>
Ian Watson (lpr687)	<p>Policy is supported.</p>	<p>Comments noted.</p>

Respondent	Response	Council Response
	<p>GI can provide multiple benefits. GI can incorporate multiple gains if properly planned especially in reducing flood risk and increasing biodiversity.</p> <p>Consider how GI can support threatened habitats such as wetlands and wet woodland.</p>	<p>Amend the first paragraph of the policy as follows – ‘The Council will <del>maximise the potential for</del> strengthening both local and strategic green infrastructure (GI) <u>assets</u> across the District. <del>Development will protect and</del> <u>This will be achieved by protecting and enhancing</u> <del>enhance</del> existing GI assets and linkages and adding to the local network for the benefit of both the natural environment and the health and wellbeing of the community.....’</p> <p>Add an additional bullet point to the policy as follows – ‘<u>protect, enhance and support the creation of integrated constructed wetlands, ‘wet woodland’ habitats, ponds, lakes, reed beds, raingardens, and floodplain meadows;</u>’</p>
<b>Landowners, site promoters and developers</b>		
Pegasus Planning Group for Calcot Park Golf Club (lpr325)	<p>This policy states that the council will maximise the potential for strengthening both local and strategic Green Infrastructure (GI) across the district. Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment and the health and wellbeing of the community.</p> <p>Calcot Park Golf Club (CPGC) is a land holding of 81 hectares (200 acres). Only 6.2 hectares (16.3 acres) is proposed for residential development in the north-eastern extremity of the land holding. There will be considerable scope available to use parts of the remaining landholding to plant new trees and other GI to enhance and protect the verdant character and appearance of the local area. Other sites that the council has selected for development do not have the scope for GI improvements on this scale. Allocation of land at CPGC will ensure that significant GI improvements will be provided as part of a landscape-led scheme. The availability of so much land in the same ownership and adjoining the proposed development will offer opportunities to make a significant net gain in GI, which will be to the benefit of the local community. Land could also be used to improve GI provision to compensate for the allocation of other small development sites in the Eastern Area, where opportunities are limited on the allocated sites. Given the location of the GI, on CPGC, which is managed by a team of</p>	Comments noted.

Respondent	Response	Council Response
	<p>experienced green keepers, it will be possible to ensure that any new planting is maintained and properly managed over the long-term, which will ensure that the GI improvements are there to be enjoyed by the local community for many decades to come.</p>	
<p>Pegasus Planning Group for Newbury &amp; Crookham Golf Club (lpr2053)</p>	<p>This policy states that the council will maximise the potential for strengthening both local and strategic Green Infrastructure (GI) across the district. Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment and the health and wellbeing of the community. Newbury and Crookham Golf Club (NCGC) is a land holding of 50 hectares (123 acres). Only 2 hectares (5 acres) are proposed for residential development in the south-west extremity of the land holding. There will be considerable scope available to use parts of the remaining 48 hectares of land to plant new trees and other GI to enhance and protect the verdant character and appearance of the local area on the south-eastern edge of the settlement. Other sites that the Council has selected for development do not have the scope for GI improvements on this scale. Allocation of land at NCGC will ensure that significant GI improvements will be provided as part of a landscape-led scheme. The availability of so much land in the same ownership and adjoining the proposed development will offer opportunities to make a net gain in GI, which will be to the benefit of the local community. Land could also be used to improve GI provision to compensate for the allocation of other small development sites on the edges of Newbury, where opportunities are limited on the allocated sites. Given the location of the GI on NCGC, which is managed by a team of green keepers, who are highly qualified in arboreal and ecological care, it will be possible to ensure that any new planting is maintained and properly managed over the long-term which will ensure that the GI improvements are there to be enjoyed by the local community for many decades to come.</p>	<p>Comments noted.</p>
<p>Savills for Engelfield Estate (lpr1528)</p>	<p>Draft LPR Policy SP10 requires development proposals to protect and enhance green infrastructure across the District. Whilst supporting paragraph 5.55 sets out 'examples of GI assets', further clarification is required to specify land which is GI and subject to this policy. This is based on the Estate's experience where the relevant Core Strategy policy (Policy CS18) relating to GI has previously been misapplied to restrict</p>	<p>Comments noted.</p> <p><u>Amend the start of the first paragraph of the supporting text to read – 'The NPPF defines green infrastructure as 'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of</u></p>

Respondent	Response	Council Response
	<p>development in rural areas. The NPPF glossary defines GI as land which can provide <i>'a wide range of environmental and quality of life benefits for local communities'</i> and therefore it is clear that such land must be publicly accessible. As such, it should be made clear that GI excludes for example open countryside, agricultural land and garden land, in line with the NPPF.</p>	<p><del>delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities across the District...</del></p>
<p>Southern Planning Practice for The Saunders Family (lpr1926)</p>	<p>We support the design principles set out in Policy SP7 and can confirm that any future residential development on land east of Stoney Lane would ensure these principles are incorporated.</p> <p>The allocation of the site would strengthen the sense of place in this area of Newbury. Together with the land at Coley Farm, the site could provide a comprehensive development which would create a distinctive place. This approach would be in accordance with the recent NPPF consultation (January 2020) which focuses on place-making. The opportunities and constraints plan indicatively shows how the two sites would seamlessly integrate. The site is in a sustainable location and is of a scale which could deliver a high-quality landscape-led development with many public benefits. One key benefit the site could offer is the provision and strengthening of the Green Infrastructure in the area. The site could provide a large area of public open space together with creating links to the Copse to the east and the new residential development proposed at Coley Farm to the south west.</p>	<p>Comments noted.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP11 Biodiversity and Geodiversity

### (Proposed Submission LPR Policy: SP11 Biodiversity and Geodiversity)

Number of responses received: 34

Respondent	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr745)	Just wondering if there is a qualifier for this section that can apply to the phrase 'designated sites' to distinguish them from others, eg designated heritage assets - not my area but are they also called designated sites of importance for biodiversity?	Comments noted.  Amend the policy and supporting text to better reflect paragraph 175 of the NPPF which states 'Plans should: distinguish between the hierarchy of international, national and locally designated sites' and paragraph 179 a) which states 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity'. By aligning the Local Plan closer to the NPPF it will make the policy clearer that the designated sites relate to biodiversity rather than heritage assets.
West Berkshire Council Ecologist (lpr1693)	First line of policy - Development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver a net gain <u>for those aspects</u> . 7 <sup>th</sup> bullet - Can we add something to the effect of dealing with non-natives at the catchment level as part of strategic approach? Last sentence of policy – long term should be specified to be a minimum of 25-30 years	Comments noted.  Amend the policy to set out that the applicant must demonstrate how they conserve and enhance biodiversity and/or geodiversity and achieve a net gain. It is felt it is clear that the net gain relates to biodiversity and geodiversity and therefore not necessary to add additional wording. In addition, biodiversity net gain has been drawn

Respondent	Response	Council Response
		<p>out into its own sub-section in the policy to ensure it has the prominence required and reflects the requirements of the Environment Act 2021.</p> <p>In regards to dealing with non-native species in the catchment area, the LPR can contribute to strategic action but it is not the right document to take a catchment level approach to this generic issue. However, criteria e) of the policy states 'seeks to eradicate or control any invasive non-native species present on site' which contributes to controlling non-native species.</p> <p>It is recognised that clarity on what is deemed 'long term maintenance' would be beneficial and provide certainty. The following text will be inserted into the supporting text of the policy:</p> <p><u>'...To ensure the successful delivery and conservation in perpetuity, management arrangements will also need to be considered. Policy SP11 requires the long term management and maintenance of a site, and this should be achieved through a Habitat Management Plan. Details of maintenance requirements and arrangements must be set out, including who is responsible for these requirements. Funding arrangements for delivery of the long-term maintenance requirements should be demonstrated to the Council before construction starts, including measures to secure biodiversity through all phases and stages of the development.</u></p> <p><u>The Environment Act 2021 sets out that in relation to biodiversity net gain any on-site or off-site biodiversity increase must be secured for 30 years. To allow for a consistent approach the Council will define long term management and maintenance to be a minimum of 30 years.'</u></p>
<b>Statutory consultees</b>		
Cold Ash Parish Council	Policy is supported. No further comment.	Noted.

Respondent	Response	Council Response
(lpr1736)		
Greenham Parish Council (lpr899)	Greenham would like to see this policy enhanced. Greenham would also like to see any Bio diversity gains and benefits, felt locally	Comments noted. Biodiversity Net Gain will be moved from being a criterion so it is considered in its own right to reflect its passage into the Environment Act 2021. The text will be amended to include reference to the net gain being measurable and also to make reference that in the first instance should be provided on site to ensure local gains are made.
Holybrook Parish Council (lpr2450)	Policy is supported. No further comment.	Noted.
Hungerford Town Council (lpr149)	Policy is supported. No further comment.	Noted.
Newbury Town Council (lpr2262)	We support this policy but again feel that it ought to mention the biodiversity value of allotments.	Noted, it is acknowledged that allotments can make a positive contribution to biodiversity.  The following text will be added to the supporting text to recognise the variety of spaces which can contribute to biodiversity value: <u>'The 2019 'State of Nature Report' indicates that biodiversity across the UK is continuing to decline and as such change is required in relation to how we manage land. The Report highlights that urbanisation can fragment landscapes by creating barriers between habitats, thus isolating some populations but also recognises the wide variety of green spaces which exist within urban environments including domestic gardens, parks, allotments, cemeteries, ponds, and road verges which can all add to biodiversity value.'</u>
Shaw-cum-Donnington Parish Council (lpr205)	We support the policy. There is no indication of where resources will come from. In bullet 4 what does a 10% gain in biodiversity mean and how do you measure it?	Comments noted. Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this

Respondent	Response	Council Response
		<p>should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p>
Stratfield Mortimer Parish Council (lpr400)	Policy is supported. No further comment.	Noted.
Thatcham Town Council (lpr1398)	<p>Policy is neither supported nor not supported.</p> <ul style="list-style-type: none"> <li>• Development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver a net gain.</li> </ul> <p>As noted earlier, with regards to Thatcham NE we recognise that there are many kilometres of ancient hedgerows that support a range of biodiversity. The encircled Ancient Woodland is also a recognised Local Wildlife Site and is recorded on the Thames Valley Environment Record.</p> <p>Policy needs to reflect on how wildlife sites are not weakened but improved.</p>	<p>Comments noted. Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the</p>



Respondent	Response	Council Response
	<p><i>The conflict between the NE Thatcham site selection and the policy needs to be resolved.</i></p>	<p>biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in ‘biodiversity units’, using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p>
<p>Environment Agency (lpr1662)</p>	<p>Policy is neither supported nor not supported.</p> <p>We welcome the inclusion of this policy. However, it should provide more protection for the water environment. We have serious concerns as the water environment is not mentioned adequately in this policy at the moment. Without a strengthened policy to support the water environment, or a separate policy, the local plan would be found unsound in the future. We would like to see a separate policy for the water environment, particularly given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain. We would be happy to work with you to draft appropriate wording for a new policy. It its’ current form, Policy SP 11 is not in accordance with paragraph 170 of the NPPF as it does not do enough to contribute to and enhance the natural and local environment by:</p> <ol style="list-style-type: none"> <li>1. a) protecting and enhancing valued landscapes, sites of biodiversity or geological value.</li> </ol> <p>If you are unable to include a separate policy the policy wording of Policy SP 11 and its’ supporting text requires strengthening in the following ‘River Buffer Zones’ section.</p> <p>Second bullet point: should say ‘avoid’ rather than ‘minimises’ fragmentation to strengthen this policy</p>	<p>Comments on the water environment are noted, Emerging Draft LPR Policies DC4 and DC5 have regard to water quality and water resources. These policies will be strengthened following consultation.</p> <p>In the Proposed Submission LPR Policy DM6 Water Quality, an additional criterion will be added to ensure that proposals demonstrate ‘<u>how the proposal will support improving the status and overall health of the River Kennet and River Lambourn</u>’. This is elaborated on in the supporting text to include: ‘<u>Proposals which contribute to the protection and enhancement of the River Kennet and River Lambourn’s overall health and improved status under the Water Framework Directive will be supported</u>’. In addition criteria a) will be amended to incorporate the following wording a) that it causes no deterioration in the quality of waterbodies, surface and groundwater, nor that it will prevent future attainment of ‘<u>favourable condition</u>’ for <u>Sites of Special Scientific Interest (SSSI) rivers, waterbodies or wetlands (as required by Wildlife and Countryside Act 1981 (as amended), or ‘good status’ for other waterbodies</u> under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and Groundwater (Water Framework Directive)</p>

Respondent	Response	Council Response
	<p>Fourth bullet point regarding net gain: this should be strengthened to quantify that a minimum of 10% biodiversity net gain (BNG) should be achieved. This is recommended to futureproof your local plan in accordance with paragraph 149 of the NPPF to mitigate and adapt to climate change and take into account the long term implications for biodiversity and landscapes. Fifth bullet point – ‘provides or retains appropriate buffer zones between development proposals and designated sites’. Rather than just designated sites, it needs to be re- worded to include habitats of principal importance that may be outside of designated sites. This is where expect buffer zones for all watercourses to be added and a minimum a 10m for main rivers to be added, explained below.</p> <p><u>River Buffer Zones</u></p> <p>We require buffer zones for all watercourses, along with the specification of a minimum width of undeveloped buffer zone to statutory main rivers (including culverted rivers), in order to protect and enhance them as a wildlife asset. We recommend the following wording to strengthen the fifth bullet point in Policy SP 11, or as a new bullet point included after this. Development will be permitted where it:</p> <p>Retains or provides a minimum of 10 metre undeveloped buffer zone alongside river corridors (including culverted rivers). This buffer zone should be on both sides and measured from the top of the river bank at the point at which the bank meets the level of the surrounding land.</p> <p>Due to the importance of the designated rivers in West Berkshire, the River Kennet SSSI and River Lambourn SAC, some development sites would require much greater than a 10m buffer zone. We would be happy to provide justification if required and support you to implement these changes regarding the water environment throughout the local plan process.</p> <p><b>Supporting text:</b></p> <ul style="list-style-type: none"> <li>We expect more detail to be added for the three SACs in West Berkshire to explain why they are so ecologically important. There are details regarding the proximity to Thames Basin Heaths SPA, and SSSIs in West Berkshire, but no explanation of the ecological importance of the three SACs. Please include</li> </ul> <p>There should be wording as in 5.61 for SPAs, i.e. ‘Where a significant effect exists or cannot be excluded, an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2010 would need to be</p>	<p>(England) Direction 2016 or subsequent amendment’. Greater protection will also be provided to SSSI’s through this policy with the following additional criteria: <u>‘where proposals are not connecting to the sewer network and are within 500 metres of a SSSI an assessment of the risk to water quality will be required’</u>; In addition to this an additional criteria will be added to include a buffer of at least 10 metres along all water courses: <u>‘Proposals for built development will be required to be at least 10 metres away from the top of the bank of the nearest watercourse or main river providing or retaining a natural or semi-natural habitat buffer’</u>;</p> <p>The supporting text will be expanded to provide greater guidance and sets out: <u>‘The Strategic Flood Risk Assessment (2021) has identified that to enable the preservation of a watercourse corridor there should be no built development within 10 metres from the top of a Main River and recommends this buffer is applied to all watercourses. The built environment refers to any man made structure and also includes formal landscaping, sports fields, footpaths, lighting and fencing and the buffer should be maintained for native biodiversity. This width of buffer allows for the enhancement of wildlife habitats, flood flow conveyance and future watercourse maintenance and/or improvement. It also ensures that the watercourse is buffered from land-based activities, reducing the levels of diffuse pollution reaching the watercourse’</u>.</p> <p>The supporting text will also be amended in SP11 to provide greater support to criteria d) provides or retains appropriate buffer zones between development proposals and designated sites; The supporting text will state: <u>A buffer zone is a landscape feature which can be used to protect a sensitive area from the impacts of development (or other harmful neighbouring land use.</u></p>

Respondent	Response	Council Response
	<p>undertaken. Proposals will only be permitted if they do not adversely affect the integrity of the SAC’.</p> <p>For the River Kennet SSSI and River Lambourn SSSI, a minimum 10m wide undeveloped buffer zone must be retained and enhanced or provided.</p>	<p><u>Buffers which are linked to corridors will be supported as a means of increasing connectivity across the District to help nature thrive. Buffers should be appropriately designed and informed by an understanding of what needs to be protected and/or mitigated. Regard should be given to Policy DM5: Water Quality in regards to providing appropriate buffers along watercourses.</u></p> <p>Proposed Submission LPR Policy DM7: Water Resources and Wastewater will be strengthened and include a new criteria: <u>it will not adversely impact the water quality, ecological value or drainage function of water bodies in the District, including any adverse impacts on Source Protection Zones (SPZ).</u></p> <p>Applicants must also have specific regard to Policy SP10 Green Infrastructure. Policy SP10 Green Infrastructure will be clarified to make it clear that the policy also covers ‘blue spaces’.</p> <p>In regards to amending the Proposed Submission LPR Policy SP11 to read ‘avoids’ rather than ‘minimise in bullet point 2 the text will be amended to: <u>‘avoids <del>minimises</del> fragmentation and maximises opportunities for restoration, enhancements and connection of <del>natural habitats</del> linear features which enables strong connectivity of biodiversity as part of an integrated habitat network;</u></p> <p>The supporting text will also be amended as follows: <u>‘<del>These features are defined as</del> Linear features, or stepping stones, which <u>form part of the connected habitat includes networks of hedgerows and ditches; habitats along all water courses; roadside verges; and (cumulatively) private gardens (including links to habitats outside the District)</u>’</u></p>

Respondent	Response	Council Response
		<p>In regards to Biodiversity Net Gain, this will be moved from being a criterion so it is considered in its own right to reflect its passage into the Environment Act 2021. The text will be amended to include reference to the net gain being measurable and also to make reference to recognised biodiversity accounting metric. The latest version of the metric has not been referred to as it is anticipated future reiterations of the metric will be released.</p> <p>As highlighted above in regards to the comment relating to the inclusion of buffers this has been achieved in Proposed Submission LPR Policy DM6 Water Quality.</p> <p>Wording will be added to the supporting text to draw out the important ecological features of the SACs in the District as follows:</p> <p><u>'The Kennet and Lambourn Floodplain SAC is ecologically important as it contains a cluster of sites which supports one of the most extensive known populations of Desmoulin's whorl snail in the UK and is one of two sites representing the species in the south-western part of its range in the important chalk stream habitat. Integrity of the population is being maintained by taking measures, including habitat creation, to safeguard populations. The River Lambourn SAC is an example of a chalk river characterised by an abundance of water-crowfoots. These species help to modify water flow, promote fine sediment deposition and provide shelter and food for fish and invertebrate animals. The River provides a habitat which is only found in southern and eastern England. For part of its length it is a winterbourne, drying through the summer months. It is one of the least-modified rivers of this type, with a characteristic flora dominated by pond water-crowfoot upstream and water-crowfoot further downstream. It is adversely affected by nutrient enrichment, mainly from sewage inputs and agriculture, but is also vulnerable to</u></p>

Respondent	Response	Council Response
		<p><u>artificial reduction in river flows. In March 2022 Natural England advised that the SAC was in unfavourable condition due to unnaturally high levels of phosphorous. It also advised that future development within the hydrological catchment of the River Lambourn SAC must achieve 'nutrient neutrality' to ensure that it does not impact on the condition of the protected site. The Council's approach to nutrient neutrality is set out in Policy xx Water Quality and a more detailed Supplementary Planning Document will also be produced.</u></p> <p><u>The Kennet Valley Alderwoods SAC is an alluvial forest which contains the largest fragments of alder-ash woodland on the Kennet floodplain. The wettest areas are dominated by alder over tall herbs, sedges and reeds, but dryer patches include a base-rich woodland flora with much dog's mercury and also herb-Paris. The occurrence of the latter is unusual, as it is more typically associated with ancient woodland, whereas evidence suggests that these stands have largely developed over the past century</u></p> <p><u>The Council also has a duty to ensure that future development does not adversely affect the integrity of SACs outside of its geographical area. This includes the Solent Maritime SAC, which receives water from the River Test. The catchment for the River Test extends into a very small part of the district around Combe. It is also adversely affected by nutrient pollution and in March 2022 Natural England advised that the SAC was in unfavourable condition due to excessive levels of nitrogen. It also advised that future development within the hydrological catchment of the River Test must achieve 'nutrient neutrality' to ensure that it does not impact on the condition of the protected site.'</u></p> <p>The point regarding 'appropriate assessment' is noted and the following will be added to the policy and supporting text:</p>

Respondent	Response	Council Response
		<p>Policy inclusion:  <u>'Development likely to result in a significant effect on an internationally designated site will be subject to assessment under the Habitats Regulations and will not be permitted unless it can be demonstrated that there are no alternatives following/through appropriate derogation tests for the proposal and that any adverse effects on the integrity of the site can be fully avoided, mitigated and/or compensated and proposals are in the public interest.'</u></p> <p>Supporting text inclusion:  <u>'SACs are internationally important conservation sites which are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Under these regulations, it is a requirement to seek and protect the most valuable and threatened habitats and species. In accordance with the policy, any developments which are likely to have significant effects on SACs will be required to prepare an appropriate assessment to identify the implications for the site in respect of the site's conservation objectives. There are three SACs in the district (which are all sensitive to surface and groundwater quality and quantity).'</u></p> <p>In regards to the requirement for a 10 metre buffer, this will be included within Policy DM5 Water Quality in criteria e) as follows:  e) <u>'Proposals for built development will be required to be at least ten metres away from the top of the bank of the nearest watercourse or main river providing or retaining a natural or semi-natural habitat buffer';</u></p>
Natural England (lpr1597)	<p>Policy is neither supported nor not supported.</p> <p>Natural England welcome this policy, but would strongly encourage building on it and adding further detail. Comments below:</p>	<p>Comments noted.</p> <p>In regards to the comment relating to funding, this sentence will be incorporated into the policy through a new</p>

Respondent	Response	Council Response
	<ul style="list-style-type: none"> <li>• In the Policy SP11 box, the last sentence refers to ‘long term management and maintenance’ for compensatory measures’. We would insert the word ‘funded’ in here to ensure developer</li> <li>• Section 5.61 – Habitats Regulations should now be referred to as ‘<i>The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019</i>’. This is an amendment of the 2017 Habitats Regulations to ensure the legislation operates post-Brexit.</li> <li>• In reference to SSSIs and Local Sites, it should be make clearer that development in all cases should adhere to the principles of the mitigation hierarchy – avoid, mitigate and, as a last resort, Development should demonstrate how this has been followed, and policy should make it clear that development will not be permitted unless the benefits clearly outweigh the harm, in line with paras. 174 (a) and 175 of the NPPF.</li> <li>• In reference to Biodiversity Net Gain, we advise the policy makes provision for development of a specific Supplementary Planning Document on net gain that will outline in detail Council expectations of developers and mechanisms for delivery, as well as ensuring net gain is delivered in a suitably strategic Natural England would be happy to engage with the Council on implementing net gain into local policy and to advise further on the development of such a SPD.</li> <li>• Please note that Biodiversity Metric 3.0 is due to be published in Spring 2021, which will supersede <u>Biodiversity Metric 0</u>. We advise that the policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric, to be in line with para 174(b) of the NPPF which requires biodiversity net gains to be <i>measurable</i>.</li> <li>• We would encourage a priority species list to be produced and included within the Local Plan to facilitate targeting of net gain resources to species and habitats which are in most</li> </ul> <p>We would be happy to comment on such a list if produced. Rare arable plants are very important on the chalky and sandy farmland within West Berkshire. A few species which should absolutely be included are the Water</p>	<p>hierarchical approach. However, further information will be provided within the supporting text to expand on what is meant as compensatory measures as this was absent in the Emerging Draft.</p> <p>Reference to ‘the Conservation of Habitats and Species Regulations 2010’ will be replaced to reflect the current position.</p> <p>In regards to the mitigation hierarchy the policy will be amended to better reflect paragraph 179 of the NPPF. This will be achieved through making the hierarchy of sites clearer and setting out the mitigation hierarchy within the policy itself.</p> <p>In regards to Biodiversity Net Gain, this will be moved from being a criterion so it is considered in its own right to reflect its passage into the Environment Act 2021. The text will be amended to include reference to the net gain being measurable and also to make reference to recognised biodiversity accounting metric. The latest version of the metric has not been referred to as it is anticipated future reiterations of the metric will be released. The text reads: <u>‘All proposals should demonstrate a minimum net gain of 10% in biodiversity net gain via a Biodiversity Net Gain Plan using the most up to date biodiversity accounting metric developed by Natural England and provide details of the long-term maintenance and management of the net gain.’</u></p> <p>The policy will be amended to set out the hierarchy of international, national and locally designated sites of importance for biodiversity as per paragraph 179 a) of the NPPF, this will make the hierarchy clearer and the suggested wording ‘avoid prevention of future attainment of SSSI sites from meeting Favourable Condition, or to</p>

Respondent	Response	Council Response
	<p>vole, Desmoulin's whorled snail, Willow tit, Stone-Curlew, Curlew and Duke of Burgundy butterfly.</p> <p>Further advice on biodiversity net gain can be found within Annex A.</p> <p><b>Designated Sites</b></p> <p>Para. 171 of the NPPF states that 'Plans should: distinguish between the hierarchy of international, national and locally designated sites'. There is currently no specific policy for Designated Sites. Natural England strongly encourage the provision of such a policy, to read along the lines of 'avoid prevention of future attainment of SSSI sites from meeting Favourable Condition, or to provide enhancements to enable the designated sites (SSSI, SAC, SPA) to meet Favourable Condition as per their Conservation Objectives'.</p>	<p>provide enhancements to enable the designated sites (SSSI, SAC, SPA) to meet Favourable Condition as per their Conservation Objectives' will also be incorporated into this.</p>
<b>General consultation bodies</b>		
<p>Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) (lpr723)</p>	<p>BBOWT welcomes the policy on biodiversity and geodiversity aimed at conserving and enhancing biodiversity and delivering a net gain.</p> <p>BBOWT would like to make the following recommendations to strengthen and extend the protection and enhancement of biodiversity and provide comments below on the following topics:</p> <ul style="list-style-type: none"> <li>• Biodiversity net gain (BNG)</li> <li>• Survey effort</li> <li>• Habitat retention, protection and enhancement and monitoring</li> <li>• Protection and enhancement of river and stream corridors</li> </ul> <p><b>BNG:</b></p> <p>The NPPF advises at paragraph 174(b): "<i>To protect and enhance biodiversity... plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing <b>measurable</b> net gains for biodiversity.</i>"</p> <p>It is recommended that the following wording is added to the policy to emphasise that net gains need to be measurable:</p> <ul style="list-style-type: none"> <li>• All proposals should be supported by evidence to demonstrate a biodiversity net gain using a recognised biodiversity accounting metric.</li> </ul>	<p>Comments noted. Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The Council will include the target of 10% as per the Environment Act 2021 but will express this as minimum so it is clear that this can be exceeded and a flexible approach is taken. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and</p>



Respondent	Response	Council Response
	<p>It is recommended that the following wording is added to ensure habitat creation and enhancement measures continue to deliver net gain in the long-term:</p> <ul style="list-style-type: none"> <li>• Planning conditions/obligations will be used to secure net gains in biodiversity by helping to deliver Biodiversity Action Plan targets and/or meeting the aims of Biodiversity Opportunity Areas. Developments for which these are the principal aims will be viewed favourably.</li> </ul> <p>The government consulted on the introduction of mandatory biodiversity net gain into the planning system in late 2018 and confirmation of this was announced in spring 2019. The emerging Environment Bill will set-out the statutory obligations of this decision in detail. The consultation has suggested that legislation will set the minimum gain required in biodiversity units at 10% over base value. However, several leaders in this policy area have already adopted a 20% minimum gain, with robust justification for doing so (See; Lichfield District Council <a href="#">Biodiversity &amp; Development: Supplementary Planning Document 2016</a>, (p.17) &amp; <a href="#">Oxfordshire's Biodiversity Advisory Group proposals for the Oxfordshire Plan 2050</a>).</p> <p>BBOWT is of the opinion that similar justification applies locally in West Berkshire and will consequently promote a recommendation for adopting 20% minimum biodiversity net gain here. It is important that this position is made clear to West Berkshire at this timely stage in their plan-making. Relevant findings from Defra's Impact Assessment document (See; <a href="#">Biodiversity Net Gain Consultation Impact Assessment, Defra 2018</a>) (21/11/2018) include (our emphases):</p> <ul style="list-style-type: none"> <li>• “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”</li> <li>• “..Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses.”</li> <li>• “..The department therefore favours as high a level of net gain as is feasible... The analysis undertaken in this Impact Assessment indicates that the level of requirement makes relatively little difference to the costs of mitigating and compensating for impacts.”</li> </ul>	<p>calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>The following text will be included within the policy:  <u>‘All proposals should demonstrate a minimum net gain of 10% in biodiversity net gain via a Biodiversity Net Gain Plan using the most up to date biodiversity accounting metric developed by Natural England and provide details of the long-term maintenance and management of the net gain.’</u></p> <p>Amend the policy so that the opening statement states that development proposals <u>‘will be required to demonstrate how they conserve and enhance biodiversity and/or geodiversity including their long-term future management and will deliver a minimum 10% biodiversity net gain’</u>.</p> <p>Amend the policy to include the following: <u>‘Development likely to result in a significant effect on an internationally designated site will be subject to assessment under the Habitats Regulations and will not be permitted unless it can be demonstrated that there are no alternatives following/through appropriate derogation tests for the proposal and that any adverse effects on the integrity of the site can be fully avoided, mitigated and/or compensated and proposals are in the public interest.’</u></p> <p>Supporting text inclusion:  <u>‘SACs are internationally important conservation sites which are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Under these regulations, it is a requirement to seek and protect the most valuable and threatened habitats and species. In</u></p>

Respondent	Response	Council Response
	<p>BBOWT’s position is therefore to support and active encourage the universal adoption of a required minimum 20% biodiversity net gain within policy in West Berkshire.</p> <p><b>Survey effort:</b> The policy currently contains no reference to the type of assessment that should support any planning application. Relevant habitat and species surveys and associated reports will be required to accompany planning applications which may affect a site, habitat or species of known or potential ecological value. It is recommended that the following wording is added:</p> <ul style="list-style-type: none"> <li>• In considering ecological information in support of planning applications the Council expects that surveys are undertaken by suitably qualified personnel and are consistent with nationally accepted standards i.e. British Standard 42020: Biodiversity – Code of practice for planning and development.</li> </ul> <p><b>Habitat retention, protection and enhancement and monitoring:</b> The policy recognises that there are many opportunities for biodiversity enhancement in all parts of the District and not just on identified sites. This should be extended to emphasis the importance of retaining features of biodiversity value as well as enhancing them and should set out measures for ensuring their long-term value. It is recommended that the following wording is added:</p> <ul style="list-style-type: none"> <li>• Development proposals should be expected to include features to encourage biodiversity and should retain and if possible enhance features of biodiversity value on site.</li> <li>• A monitoring and management plan will be required for biodiversity features on site to ensure their long-term suitable management.</li> </ul> <p>The policy currently states that development will be permitted where it “provides or retains appropriate buffer zones between development proposals and designated sites”. It is recommended that this wording is strengthened to state that appropriate buffers should be identified following robust site assessment. It is recommended that the wording is amended to read:</p> <ul style="list-style-type: none"> <li>• provides or retains appropriate buffer zones between development proposals and designated sites informed by detailed site-based assessment.</li> </ul> <p><b>Protection and enhancement of river and stream corridors:</b></p>	<p><u>accordance with the policy, any developments which are likely to have significant effects on SACs will be required to prepare an appropriate assessment to identify the implications for the site in respect of the site’s conservation objectives. There are three SACs in the district (which are all sensitive to surface and groundwater quality and quantity):’</u></p> <p>Amend the supporting text to state: ‘<u>Policy SP11 requires the long term management and maintenance of a site, and this should be achieved through a Habitat Management Plan. Details of maintenance requirements and arrangements must be set out, including who is responsible for these requirements.’</u></p> <p><u>‘To demonstrate that development proposals have met the requirements of Policy SP11, they will need to be accompanied by an appropriate ecological impact assessment (EclA) where this is relevant to the type of development proposed and its relationship with biodiversity and geodiversity interests. These assessments should be undertaken by a suitably qualified and/or experienced ecologist, be consistent with nationally accepted standards and guidance from the Chartered Institute of Ecology and Environmental Management, and will need to include a Biodiversity Gain Plan (including the completed Metric calculator) to measure the net gain achieved on site or loss that would need to be compensated. The assessment should be proportionate to the scale and impact of the development and so for householder and most minor applications this will initially involve a Preliminary Protected Species Survey or Preliminary Ecological Appraisal in order to assess if further work is required.’</u></p>

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	<p>It is recommended that an additional policy on the Protection and Enhancement of River and Stream Corridors be included. The river network of West Berkshire has considerable ecological and amenity value and the Local Plan should include policy to ensure the protection and enhancement of its watercourses. It is recommended that the following policy wording is used:</p> <ul style="list-style-type: none"> <li>• Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.</li> <li>• Development should seek to conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design. Opportunities for de-culverting of watercourses should be actively pursued.</li> <li>• Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting.</li> <li>• Development proposals adjacent to or containing a watercourse should provide or retain a 10m buffer between the top of the river bank and the development, and include a long term landscape and ecological management plan for this buffer.”</li> </ul>	<p>In regards to habitat retention and the inclusion of the following wording: <i>Development proposals should be expected to include features to encourage biodiversity and should retain and if possible enhance features of biodiversity value on site.</i> It is considered that this is already included within criterion c) of the Emerging Draft LPR and would therefore just repeat what is already drafted in policy.</p> <p>Additional wording relating to buffers will be added to the policy and the supporting text expanded:</p> <p><u>‘provides or retains appropriate buffer zones between development proposals and designated sites, habitats for protected or priority species or main rivers informed by detailed site-based assessment;’</u></p> <p>In regards to comments on the protection and enhancement of river and stream corridors. A number of amendments have been made to policies within the LPR which address concerns raised within this representation. These include Proposed Submission Policies DM6 Water Quality, DM7 Water resources and waste water and SP10 Green Infrastructure.</p> <p>In Proposed Submission Policy DM6 Water Quality, an additional criterion will added to ensure that proposals demonstrate <u>‘how the proposal will support improving the status and overall health of the River Kennet and River Lambourn’</u>. In addition criteria a) will be amended to incorporate the following wording a) that it causes no deterioration in the quality of waterbodies, surface and groundwater, nor that it will prevent future attainment of <u>‘favourable condition’ for Sites of Special Scientific Interest (SSSI) rivers, waterbodies or wetlands (as required by Wildlife and Countryside Act 1981 (as amended), or ‘good</u></p>

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		<p>status' for <u>other waterbodies</u> under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and Groundwater (Water Framework Directive) (England) Direction 2016 or subsequent amendment'. Greater protection will also be provided to SSSI's through this policy with the following additional criteria: <u>'where proposals are not connecting to the sewer network and are within 500 metres of a SSSI an assessment of the risk to water quality will be required'</u>; In addition to this an additional criteria will be added to include a buffer of at least 10 metres along all water courses: <u>'Proposals for built development will be required to be at least ten metres away from the top of the bank of the nearest watercourse or main river providing or retaining a natural or semi-natural habitat buffer'</u>; The supporting text will be expanded to provide greater guidance</p> <p>Proposed Submission Policy DM6: Water Resources and Wastewater will be amended and strengthened and include a new criteria: <u>f) it will not adversely impact the water quality, ecological value or drainage function of water bodies in the District, including any adverse impacts on Source Protection Zones (SPZ).</u></p> <p>Applicants must also have specific regard to Policy SP10 Green Infrastructure. Policy SP10 Green Infrastructure is to be clarified to make it clear that the policy also covers 'blue spaces'. It will also include the following:</p> <p><u>h. does not involve the culverting of watercourses, except where essential to allow highways and / or other infrastructure to cross;</u></p> <p><u>i. protects, enhances and supports the creation of integrated constructed wetlands, 'wet woodland' habitats, ponds, lakes, reed beds,raingardens, and floodplain meadows;</u></p>

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		<p><u>j. makes appropriate provision to protect, enhance, improve and maintain accessible networks of blue corridors, including through de-culverting, back water creation, de-silting, naturalising the channel through in-channel habitat enhancements and removal of structures where appropriate;</u>  <u>k. maintains and enhances natural drainage features;</u>  <u>l. provides 'buffer strips' of vegetation along the banks of water courses.</u></p>												
<p>North Wessex Downs AONB (lpr1626)</p>	<p>Policy is supported.</p> <p>Fits within the vision of the AONB to enhance the AONB landscape for which biodiversity is central too, as address within our Management Plan.</p> <p>Need to be clear on the baseline for assessing net gain, unfortunately the AONB family has experienced issues whereby developers have cleared a site and made a baseline assessment on a cleared site, for which a 10% minimum gain can be achieved with minimal effort, yet had the original site been used with its flora and fauna in place then the proposed would only have achieved a 3% gain, which would be significantly inadequate. The NWD AONB have compiled a priority species list which may be of use.</p> <table border="1" data-bbox="436 981 1344 1332"> <thead> <tr> <th data-bbox="436 981 676 1021">Common name</th> <th data-bbox="676 981 996 1021">Latin name</th> <th data-bbox="996 981 1344 1021">Importance in NWDAONB</th> </tr> </thead> <tbody> <tr> <td data-bbox="436 1021 676 1157">Stone Curlew</td> <td data-bbox="676 1021 996 1157">Burhinus oedicephalus</td> <td data-bbox="996 1021 1344 1157">2. Top 5 NCA.</td> </tr> <tr> <td data-bbox="436 1157 676 1228">Corn Bunting</td> <td data-bbox="676 1157 996 1228">Emberiza calandra subsp. calandra/clanceyi</td> <td data-bbox="996 1157 1344 1228">3. Top 10 NCA.</td> </tr> <tr> <td data-bbox="436 1228 676 1332">Duke of Burgundy</td> <td data-bbox="676 1228 996 1332">Hemaris lucina</td> <td data-bbox="996 1228 1344 1332">3. Top 10 NCA</td> </tr> </tbody> </table>	Common name	Latin name	Importance in NWDAONB	Stone Curlew	Burhinus oedicephalus	2. Top 5 NCA.	Corn Bunting	Emberiza calandra subsp. calandra/clanceyi	3. Top 10 NCA.	Duke of Burgundy	Hemaris lucina	3. Top 10 NCA	<p>Comments noted.</p> <p>In regards to Biodiversity Net Gain, this will be moved from being a criterion so it is considered in its own right to reflect its passage into the Environment Act 2021. The text will be amended to include reference to the net gain being measurable and also to make reference to recognised biodiversity accounting metric. The latest version of the metric has not been referred to as it is anticipated future iterations of the metric will be released. The text reads: <u>'All proposals should demonstrate a minimum net gain of 10% in biodiversity net gain via a Biodiversity Net Gain Plan using the most up to date biodiversity accounting metric developed by Natural England and provide details of the long-term maintenance and management of the net gain.'</u></p> <p>Information noted and welcome, although a priority species list will not be explicitly listed within the LPR as this could change. Further information for priority species will be included in the supporting text as follows:  <b><u>Protected and Priority Species</u></b>  <u>Some species, such as bats, great crested newts and badgers, have special protection under international and national legislation (such as the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017.) and must be</u></p>
Common name	Latin name	Importance in NWDAONB												
Stone Curlew	Burhinus oedicephalus	2. Top 5 NCA.												
Corn Bunting	Emberiza calandra subsp. calandra/clanceyi	3. Top 10 NCA.												
Duke of Burgundy	Hemaris lucina	3. Top 10 NCA												

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	Adonis Blue	Polyommatus bellargus		<p>considered as part of the planning application process. Similarly, priority species are identified under Section 41 of the Natural Environment and Rural Communities (NERC) Act as of principal importance for the purposes of conserving biodiversity in England. The Thames Valley Environmental Records Centre also holds information for rare, scarce and notable (but not limited to) Native, locally common, vulnerable to extinction, priority species may be present and affected by a proposal. Kennet &amp; Lambourn Floodplain support one of most extensive populations in UK. Comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made. Number of historic records should be in SSSIs &amp; NNRS. Wiltshire's County flower Short-hair turf grass Wiltshire Downs Smells of honey but produces no nectar. For example, the Sky Lark, Larkwing and other ground nesting birds require suitable habitats so that the species are not displaced as part of development which would limit the success of the species. There are many opportunities for biodiversity and geodiversity enhancement in all parts of the District and not just on identified sites.</p>
Wart-biter Bush Cricket	Decticus verrucivorus	2. Top 5 NCA.		
Water vole	Arvocola amphibius	Mainly K&A Canal, Pang, Southern Streams and SW corner of AONB		
Desmoulin's Whorl Snail	Vertigo moulinsiana	3. Top 10 NCA		
Burnt-tip Orchid	Orchis ustulata (= Neotinea ustulata)	3. Top 10 NCA		
Corn Buttercup	Ranunculus arvensis	2. Top 5 NCA in the country for the following species		
Brook Lamprey	Lampetra planeri	4. Present (National Significance of Population unconfirmed)		
Heritage Forum (lpr75)	Policy is supported.  How will the minimum 10% net gain for biodiversity be measured and achieved?			<p>Comments noted, biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before</p>

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		<p>development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p>
<p>Local Nature Partnership (lpr34)</p>	<p>Policy neither supported nor not supported.</p> <p>The Berkshire Local Nature Partnership (BLNP) is the single voice of organisations across a variety of sectors who are working to achieve the protection and enhancement of the natural environment in Berkshire. The BLNP represents over 15 partner organisations (1) and is a source of valuable expertise and local knowledge on the natural environment. The National Planning Policy Framework 2019 (NPPF) encourages local authorities to work with LNPs in developing strategic policies for their area (2).</p> <p>The BLNP recommends that the following principles are applied in relation to the above referenced consultation -</p> <ul style="list-style-type: none"> <li>• Existing biodiversity should be protected</li> <li>• Decisions should be made using the best available information &amp; expertise</li> <li>• Development should deliver a measurable net gain for biodiversity</li> <li>• The planning process should conserve &amp; enhance ecological networks</li> <li>• Long-term &amp; cumulative impacts on biodiversity should be assessed &amp; minimised</li> <li>• Ensure best practice for the overall sustainability of developments</li> <li>• Recognise the benefits of nature in all forms to society</li> </ul> <p>These principles are described below.</p> <p><b>Existing biodiversity should be protected</b> in accordance with statutory duties (3). Existing biodiversity assets should first be identified and mapped.</p>	<p>The comments and information provided by the Local Nature Partnership are noted.</p> <p>In regards to the hierarchy of sites, the policy and supporting text will be updated to better reflect paragraph 175 which states 'Plans should: distinguish between the hierarchy of international, national and locally designated sites' and paragraph 179 a) which states 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity'. By aligning the Local Plan closer to the NPPF it makes the policy clearer that the designated sites relate to biodiversity rather than heritage assets.</p> <p>In relation to comments on biodiversity net gain, biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a</p>

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	<p>Biodiversity assets comprise all levels of designated sites, priority habitats, protected and priority species, wildlife corridors, 'stepping stone' habitats (described further in Principle 4) and any areas identified by local or national partnerships(4).</p> <p>Allocations of land for development should favour that with the least environmental value (5) and when determining planning applications the mitigation hierarchy (6) should be followed. This means that significant harm to biodiversity should be avoided altogether in the first instance. Impacts that cannot be avoided through relocating development should be mitigated. As a last resort, residual impacts should be compensated for by providing compensatory habitat such as an appropriately located biodiversity offset (described further in Principle 3).</p> <p>Local policies and procedures should be in place to adequately guide and regulate all activity likely to affect biodiversity.</p> <p><b>Decisions should be made using the best available information</b> and expertise to ensure compliance with statutory obligations and policy requirements (7), and to secure the best outcomes for biodiversity. All planning authorities should have access to specialist ecological advice, preferably that of an in-house ecology officer within the planning team. Planning applications should comply with BS42020 (8) and ecological reports should conform to industry recommended good practice (9). Current data from the Thames Valley Environmental Records Centre (TVERC) should be referenced.</p> <p><b>Development should deliver a measurable net gain for biodiversity</b> in line with government planning for the environment (10) and national planning policy (11). Biodiversity net gain should follow industry principles for good practice (12) and be measured objectively with a biodiversity impact assessment calculation ("biodiversity metric"), based on government guidance (13). A <i>de Minimis</i> approach to biodiversity net gain is not considered acceptable by this Partnership, and where there exists no locally-set minimum threshold for net gain, we consider an increase of at least 20% above the baseline biodiversity value should be required. This allows for error in measurements and embeds a contingency margin against failure.</p>	<p>10% biodiversity net gain increase from the pre-development biodiversity value. The Council will include the target of 10% as per the Environment Act 2021 but will express this as minimum so it is clear that this can be exceeded and a flexible approach is taken. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>In regards to biodiversity off-setting, further information will be included within the supporting text to set out how this should be achieved and to refer to Biodiversity Opportunity Areas as follows:</p> <p><u>'Compensatory measures refer to all measures designed to help offset the adverse effects that cannot be further reduced by mitigation measures. Compensation for residual harm is considered the last step and will be considered where it can be evidenced that on-site improvements are not possible, may result in piecemeal mitigation on small sites, or where better opportunities exist to secure net gain elsewhere. Compensatory measures (also known as biodiversity offsetting) will normally involve off-site measures to balance losses within the development site or to offset residual effects on affected wildlife sites. Compensatory measures should</u></p>



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	<p>This minimum net gain is implemented by local planning authorities elsewhere (14).</p> <p>Habitat creation should be guided by the objectives of the requisite local Biodiversity Action Plan, the Berkshire biodiversity strategy (15), and government biodiversity strategy (16).</p> <p>Where biodiversity offsets are required to enable a development to achieve a net gain these should be located in the places where they will deliver the greatest benefit for biodiversity. This means in locations identified within a local biodiversity offsetting strategy, where they will contribute to the nature recovery network. Where a development is located within a Biodiversity Opportunity Area (BOA) (17) it would be appropriate to deliver the biodiversity offset within the same BOA.</p> <p><b>The planning process should conserve and enhance ecological networks</b> in accordance with national planning policy (18). Ecological networks comprise existing biodiversity assets, the habitat that connects them, and any new areas identified for habitat restoration. They are the means of ensuring biodiversity resilience in the face of environmental change (e.g. climate, land use, etc.) enabling species to move across the landscape between core areas of habitat (e.g. existing designated sites) and to re-occupy newly restored habitat. Government planning for the environment refers to these networks as Nature Recovery Networks (10). These networks should be mapped and a plan of action to conserve and enhance them should be detailed in an appropriate strategy.</p> <p>Multifunctional green infrastructure (19) should be embedded in the design of all new development, and be guided by a local green infrastructure strategy. Green infrastructure should complement the ecological network. New development should contribute to the ecological network. The connectivity of habitats to be created should be assessed as part of the planning process using a biodiversity metric.</p> <p><b>Long-term and cumulative impacts on biodiversity should be assessed and minimised</b> in line with national planning policy requirements to ensure</p>	<p><u>provide a biodiversity net gain in accordance with Policy SP11. In addition newly created habitats should be in place in time to provide fully the ecological functions that they are intended to compensate for.</u></p> <p>Biodiversity Opportunity Areas (BOA) have been identified by the Berkshire Local Nature Partnership. There are 17 which have currently been identified, either whole or in part, across the District. BOAs do not represent a statutory designation or a constraint upon development, rather, they are the areas where biodiversity improvements are likely to have the most beneficial results at a strategic scale. The Council will pursue net gains for biodiversity in and around BOAs and projects which seek to enhance biodiversity within West Berkshire, particularly based on Biodiversity Opportunity Areas, will be supported.</p> <p>In regards to ecological networks to support climate resilience and reduce habitat fragmentation. Criteria c) of the Emerging Draft LPR policy will be expanded to support this:</p> <p><u>avoids <del>minimises</del> fragmentation and maximises opportunities for restoration, enhancements and connection of natural habitats linear features which enables strong connectivity of biodiversity as part of an integrated habitat network will be supported (including links to habitats outside the district);</u></p> <p>The supporting text will also be amended as follows:  <del>These features are defined as</del> Linear features, or stepping stones, which <u>form part of the connected habitat includes networks of hedgerows and ditches; habitats along all water courses; roadside verges; and (cumulatively) private gardens (including links to habitats outside the District)</u></p>

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	<p>biodiversity resilience (20). Any measures required to mitigate for development impacts on biodiversity must be in place for the foreseeable future ensuring biodiversity remains protected from those impacts for the whole lifetime of the development.</p> <p>Biodiversity offsets should be guaranteed permanently using appropriate legal agreements, to avoid a scenario whereby land set aside as compensatory habitat is later developed during the next planning cycle. Strategic plans should identify potential future, cumulative, or synergistic impacts arising over time from development and include mechanisms to minimise these. This could be in the form of developer contributions towards protecting biodiversity.</p> <p><b>Ensure best practice for the overall sustainability of developments</b> to minimise the environmental impacts of development throughout its lifecycle from land take, materials and sourcing, energy and water efficiency, emissions, and waste. All new housing development should be guided locally to achieve the highest standard of sustainability in line with industry best practice accreditation(21), in accordance with local authority statutory powers(22), and as recommended by national planning policy(23).</p> <p><b>Recognise the benefits of nature in all forms to society</b>, in the shape of direct and indirect benefits to public health, wellbeing, and the economy. Nature provides many benefits in the form of <i>goods</i> ('things', such as minerals, water, timber) and <i>services</i> (functions it performs, such as pollination, carbon sequestration, water filtration, flood prevention, recreation). When cast in economic terms, the value of these benefits to society is known as natural capital. A landscape-scale plan for enhancing natural capital should be developed as part of the strategic planning process to comply with national planning policy(24), using the approach recommended by government's Natural Capital Committee(25).</p> <p>Endnotes - Organisations currently represented by the Berkshire Local Nature Partnership: Berks, Bucks and Oxon Wildlife Trust, Berkshire Ornithological Club, Bracknell Forest Borough Council, British Entomological and Natural</p>	<p>The supporting text will be expanded to highlight how this policy aids climate resilience as follows: <u>'Habitat connectivity is a key challenge for biodiversity and linked to the challenge of the climate crisis it is important that habitats do not become isolated as species find themselves less able to respond to natural fluctuations where they can face heightened risk of decline and extinction.</u></p> <p><del>These features are defined as</del> Linear features, or stepping stones, which <u>form part of the connected habitat includes networks of hedgerows and ditches; habitats along all water courses; roadside verges; and (cumulatively) private gardens (including links to habitats outside the District)</u> are essential for the migration, dispersal, and genetic exchange of wild species. <u>Examples of linear features within West Berkshire include waterways such as the River Kennet, River Lambourn and the Kennet and Avon Canal and they play an important role in providing strong connecting links across the biodiversity network.</u> By protecting these natural habitats and networks across the District, the Council <del>will</del> <u>may</u> be able to avoid or repair fragmentation and isolation of natural habitats and ultimately conserve and enhance our priority natural areas and the connections between them. This element of the policy closely links with <del>the</del> <u>Policy SP10 Green Infrastructure policy.</u></p> <p>In terms of the reference to long term maintenance, this reference will be included in the opening sentence and also included in the hierarchy of sites. It is recognised that clarity on what is deemed 'long term maintenance' would be beneficial and provide certainty. The following text will be inserted into the supporting text of the policy: <u>'...To ensure the successful delivery and conservation in perpetuity, management arrangements will also need to be considered. Policy SP11 requires the long term</u></p>

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	<p>History Society, Butterfly Conservation, Country Land and Business Association, Environment Agency, National Farmers' Union, North Wessex Downs AONB, Reading Borough Council, Slough Borough Council, Thames Valley Environmental Records Centre, Thames Water, The Conservation Volunteers, University of Reading, West Berkshire Council, Wokingham Borough Council.</p> <ul style="list-style-type: none"> <li>• NPPF - paragraph 25</li> <li>• The Natural Environment and Rural Communities Act (2006) states that a public authority “<i>must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving</i>”</li> <li>• NPPF – paragraph 174</li> <li>• NPPF – paragraph 171</li> <li>• NPPF – paragraph 175</li> <li>• NPPF – paragraph 43</li> <li>• Code of Practice for Planning and Development - BS42020 : 2013</li> <li>• Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines on Ecological Report-writing, Preliminary Ecological Appraisal, Ecological Impact Assessment, Accessing and Using Biodiversity</li> <li>• A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, 2018</li> <li>• NPPF – paragraphs 8, 32, 170, 174, 175 (net gain), 20, 141, 172, (enhance natural environment, biodiversity, wildlife)</li> <li>• Biodiversity Net Gain: Good practice principles for CIEEM, CIRIA, IEMA, 2016</li> <li>• Biodiversity Offsetting Pilots Technical Paper: the metric for the biodiversity offsetting pilot in England, DEFRA, 2012</li> <li>• Biodiversity and Development Supplementary Planning Document, Lichfield District Council, 2016</li> <li>• The Natural Environment in Berkshire: Biodiversity Strategy 2014-2020, Berkshire Local Nature Partnership</li> <li>• Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services, DEFRA, 2011</li> </ul>	<p><u>management and maintenance of a site, and this should be achieved through a Habitat Management Plan. Details of maintenance requirements and arrangements must be set out, including who is responsible for these requirements. Funding arrangements for delivery of the long-term maintenance requirements should be demonstrated to the Council before construction starts, including measures to secure biodiversity through all phases and stages of the development.</u></p> <p><u>The Environment Act 2021 sets out that in relation to biodiversity net gain any on-site or off-site biodiversity increase must be secured for 30 years. To allow for a consistent approach the Council will define long term management and maintenance to be a minimum of 30 years.’</u></p>

Respondent	Response	Council Response
	<ul style="list-style-type: none"> <li>• BOAs are mapped landscape-scale areas that identify where the greatest opportunities for habitat creation and restoration lie. This enables resources to be efficiently focused to where they will have the greatest positive conservation</li> <li>• NPPF – paragraphs 170, 174</li> <li>• NPPF – paragraphs 20, 150, 171</li> <li>• NPPF – paragraphs 20, 149</li> <li>• e.g. BRE Home Quality Mark, BREEAM, Passivhaus</li> <li>• Government response to the draft revised NPPF consultation: A summary of consultation responses and the Government’s view on the way forward, July 2018 (p.48)</li> <li>• NPPF – paragraphs 8, 131, 148</li> <li>• NPPF – paragraph 171</li> <li>• How to do it: a natural capital workbook, version 1, Natural Capital Committee, HM Government, 2017</li> </ul>	
Lambourn Neighbourhood Development Plan Steering Group (lpr1705)	The emerging Lambourn NDP will support measures to protect the River Lambourn. It is one of only 210 chalk streams in the world, designated both as a SSSI and an internationally protected Special Area of Conservation (SAC), yet the water quality is only "moderate". All parts of the catchment area need to be involved in measures to improve water quality.	Comments noted. In Proposed Submission Policy DM5 Water Quality, an additional criterion will be added to ensure that proposals demonstrate <u>'how the proposal will support improving the status and overall health of the River Kennet and River Lambourn'</u> . This is elaborated on in the supporting text to include: <u>'Proposals which contribute to the protection and enhancement of the River Kennet and River Lambourn's overall health and improved status under the Water Framework Directive will be supported'</u> . In addition criteria a) will be amended to incorporate the following wording a) that it causes no deterioration in the quality of waterbodies, surface and groundwater, nor that it will prevent future attainment of <u>'favourable condition' for Sites of Special Scientific Interest (SSSI) rivers, waterbodies or wetlands (as required by Wildlife and Countryside Act 1981 (as amended), or 'good status' for other waterbodies under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and Groundwater (Water Framework Directive) (England) Direction 2016 or subsequent amendment'</u> .

Respondent	Response	Council Response
		<p>Wording will be added to the supporting text to draw out the important ecological features of the three SACs in the District as follows:</p> <p><u>'The Kennet and Lambourn Floodplain SAC is ecologically important as it contains a cluster of sites which supports one of the most extensive known populations of Desmoulin's whorl snail in the UK and is one of two sites representing the species in the south-western part of its range in the important chalk stream habitat. Integrity of the population is being maintained by taking measures, including habitat creation, to safeguard populations. The River Lambourn SAC is an example of a chalk river characterised by an abundance of water-crowfoots. These species help to modify water flow, promote fine sediment deposition and provide shelter and food for fish and invertebrate animals. The River provides a habitat which is only found in southern and eastern England. For part of its length it is a winterbourne, drying through the summer months. It is one of the least-modified rivers of this type, with a characteristic flora dominated by pond water-crowfoot upstream and water-crowfoot further downstream. It is adversely affected by nutrient enrichment, mainly from sewage inputs and agriculture, but is also vulnerable to artificial reduction in river flows. In March 2022 Natural England advised that the SAC was in unfavourable condition due to unnaturally high levels of phosphorous. It also advised that future development within the hydrological catchment of the River Lambourn SAC must achieve 'nutrient neutrality' to ensure that it does not impact on the condition of the protected site. The Council's approach to nutrient neutrality is set out in Policy xx Water Quality and a more detailed Supplementary Planning Document will also be produced.</u></p> <p><u>The Kennet Valley Alderwoods SAC is an alluvial forest which contains the largest fragments of alder-ash</u></p>

Respondent	Response	Council Response
		<p>woodland on the Kennet floodplain. The wettest areas are dominated by alder over tall herbs, sedges and reeds, but dryer patches include a base-rich woodland flora with much dog's mercury and also herb-Paris. The occurrence of the latter is unusual, as it is more typically associated with ancient woodland, whereas evidence suggests that these stands have largely developed over the past century</p> <p>The Council also has a duty to ensure that future development does not adversely affect the integrity of SACs outside of its geographical area. This includes the Solent Maritime SAC, which receives water from the River Test. The catchment for the River Test extends into a very small part of the district around Combe. It is also adversely affected by nutrient pollution and in March 2022 Natural England advised that the SAC was in unfavourable condition due to excessive levels of nitrogen. It also advised that future development within the hydrological catchment of the River Test must achieve 'nutrient neutrality' to ensure that it does not impact on the condition of the protected site.'</p>
<p>The Berkshire Ornithological Club and Newbury District Ornithological Club (lpr1299)</p>	<p>Policy neither supported nor not supported.</p> <p>We welcome that the council is proposing (in line with national planning policy) in Policy SP11 to refuse as a matter of policy to refuse any planning application that would adversely impact any protected sites, species or habitats unless there are both very exceptional circumstances justifying the development and a suitable compensation strategy is secured. We trust that this will be read in conjunction with the fourth bullet point in the policy, namely that there will have to be a net 10% gain in biodiversity, and suggest that this is spelled out in the final paragraph of the policy.</p> <p>We would though ask that the council also supports the review of Local Wildlife Sites (LWS) and the Biodiversity Action Plan and Biodiversity Opportunity Areas (BOA). We have been endeavouring to promote new candidate LWSs and a revision to the boundaries of one of the BOAs based on the results of the Berkshire Bird Atlas project. It has proved a slow</p>	<p>Comments noted. The policy will be applied as a whole to any application.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a</p>

Respondent	Response	Council Response
	<p>process. If biodiversity targets are to be set against an up-to-date action plan the latest Biodiversity Action Plan and the Local Nature Partnership's Biodiversity Strategy (whose plan period has now expired) need to be updated. This in turn needs to be done in conjunction with local wildlife groups like ourselves who hold and publish the data collected from members who collect and submit records or who contribute to the surveys we organise.</p>	<p>development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain. Whilst it is important that status of all habitats and species is kept up to date as more surveys are conducted, it is not the function of the Local Plan policies to manage this process.</p>
British Horse Society (lpr845)	<p>Policy is supported.</p> <p>We note the mention of SANGs to protect SPAs and that West Berkshire is not legally covered by these. However, West Berkshire does have similar issues on its commons where a balance between recreational use and conservation has to be made. Problems of disturbance of ground nesting birds from dog walking in particular is something which the land manager is constantly trying to balance. It might be noted that Hampshire Council has recognised the same issues and has produced a useful document. <a href="https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf">https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf</a> We are unsure how this issue can be reflected in this section of the Local Plan Review and thus have not made any suggestions for the text</p>	<p>Comments noted.</p> <p>Provision for green space is made through Policy SP10 Green Infrastructure. The detail for the design of multi-functional green infrastructure that takes into account dog ownership would be a matter for individual developments at the planning application stage.</p>
Mid and West Berkshire Local Access Forum (lpr1861)	<p>MWBLAF notes the mention of SANGs to protect SPAs, and that West Berkshire is not legally covered by these. However, West Berkshire does have similar issues on its commons, where a balance between recreational use and conservation has to be made. Problems of disturbance of ground nesting birds from dog walking in particular is an issue which the land manager is constantly trying to balance. Hampshire County Council has recognised the same issues and has produced a useful document:</p>	<p>Comments noted.</p> <p>Provision for green space is made through Policy SP10 Green Infrastructure. The detail for the design of multi-functional green infrastructure that takes into account dog ownership would be a matter for individual developments at the planning application stage.</p>

Respondent	Response	Council Response
	<p><a href="https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf">https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf</a></p> <p>We are unsure how this issue can be reflected in this section of the Local Plan Review and thus have not made any suggestions for the text.</p>	
<p>West Berkshire Green Party (lpr 1834)</p>	<p>We strongly support the aims of SP11, but we believe it is incompatible with proposals elsewhere in the plan for huge developments at Sandford and North-East Thatcham. For example, it is delusional to imagine that any “net gain” in terms of biodiversity can be achieved at Sandford – bats, badgers and other mammals, skylarks, woodpeckers and other birds, many species of butterflies, moths and other insects, will simply not be there any more, along with their wildlife corridors. No “off-site compensation” could in our view compensate for this permanent loss. The buffer zones of 15 metres envisaged between development and areas of ancient woodland is the bare minimum to protect the roots and neighbouring local authorities such as Wiltshire County Council and Basingstoke &amp; Deane have already established larger zones (in the latter case, a minimum of 20 metres for any development adjacent to woodland, and more when ancient woodland or nature corridors are affected)</p>	<p>Comments noted.</p> <p>The Council does not agree that large developments are incompatible with the conservation of biodiversity and achieving net gain. Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The Council will include the target of 10% as per the Environment Act 2021 but will express this as minimum so it is clear that this can be exceeded and a flexible approach is taken. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in ‘biodiversity units’, using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p>



Respondent	Response	Council Response
		<p>In regards to biodiversity off-setting, further information will be included within the supporting to set out how this should be achieved as follows –</p> <p><u>‘Compensatory measures refer to all measures designed to help offset the adverse effects that cannot be further reduced by mitigation measures. Compensation for residual harm is considered the last step and will be considered where it can be evidenced that on-site improvements are not possible, may result in piecemeal mitigation on small sites, or where better opportunities exist to secure net gain elsewhere. Compensatory measures (also known as biodiversity offsetting) will normally involve off-site measures to balance losses within the development site or to offset residual effects on affected wildlife sites. Compensatory measures should provide a biodiversity net gain in accordance with Policy SP11. In addition newly created habitats should be in place in time to provide fully the ecological functions that they are intended to compensate for.</u></p>
The Woodland Trust (lpr1006)	<p>We welcome the strong wording in support of conserving and enhancing biodiversity, including a minimum 10% net gain, developed as part of a Biodiversity Action Plan, Local Nature Recovery Strategy or other relevant strategies.</p> <p>Before seeking net gain, planning policies must ensure that any proposed development minimises land take, and avoids damage to any existing high-quality habitats, including ancient woodland. Where ancient woodland or veteran trees are lost or damaged there will always be net loss of biodiversity and it is impossible to secure net gain.</p> <p>Net gain can be delivered through allowing natural regeneration and woodland restoration, as well as new planting, and this should be reflected in accompanying guidance.</p> <p>We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience.</p>	<p>Comments noted.</p> <p>Amend the policy and supporting text to better reflect paragraph 175 of the NPPF which states ‘Plans should: distinguish between the hierarchy of international, national and locally designated sites’ and paragraph 179 a) which states ‘Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity’. This includes irreplaceable habitats such as ancient woodland and ancient or veteran trees.</p> <p>In regards to biodiversity net gain, mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to</p>

Respondent	Response	Council Response
		enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The Council will include the target of 10% as per the Environment Act 2021 but will express this as minimum so it is clear that this can be exceeded and a flexible approach is taken.
<b>Other stakeholders</b>		
Ailsa Claybourn (lpr733)	My concern is that ecological surveys must be thorough, detailed and comprehensive; having recently been involved in a planning application on Oxford Road/Oregon Avenue, Tilehurst, I was shocked and disappointed by the skimpy survey that the permission was about to be granted on fortunately, a more thorough survey was completed and submitted, which proved the ecological importance and value of the site. The application was then turned down. But it might have gone through because of a lack of due diligence. The proposed policy in this Local Plan appears sound; but it must be adhered to diligently.	Comments noted regarding the effective implementation of the policy.
Sam Coppinger (lpr292)	Policy is supported.	Noted
Nicholas Pflaeger (lpr1197)	Policy not supported.  Development that would have a direct or indirect adverse effect on designated sites, protected or priority species or habitats that are considered to have geological and biodiversity value, will be refused.	Comments noted.  Amend the policy and supporting text to better reflect paragraph 175 of the NPPF which states 'Plans should: distinguish between the hierarchy of international, national and locally designated sites' and paragraph 179 a) which states 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity'.
Deborah Reynolds (lpr2463)	There are several important and strategic statements to emphasise here, in particular:	Comments noted,  Amend the supporting text as follows –

Respondent	Response	Council Response
	<p>'To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11</p> <p>Ecological distinctiveness – design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11</p> <p>A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings.</p> <p>Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to nature recovery networks.</p> <p>However the absence of the strategic priority reduces their impact and will not ensure their delivery.</p> <p>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document. This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect.</p>	<p><u>'Local Nature Recovery Strategies are a new system of spatial strategies for nature they will: map the most valuable existing habitat for nature; map specific proposals for creating or improving habitat for nature and wider environment goals; and agree priorities for nature's recovery. Once the Local Nature Recovery Strategy is produced for the District it will guide the delivery of biodiversity net gain and other nature recovery measures through illustrating where the most valuable existing habitats are located and will focus on habitat creation and/or improvement where it will achieve the best outcomes. Prior to the Local Nature Recovery Strategies produced the Council will work with applicants and relevant stakeholders to identify strategic locations for the delivery of off-setting as part of the Local Nature Recovery Network. The Biodiversity Opportunity Areas are likely to be incorporated into the Local Nature Recovery Network'</u></p>
Paula Saunderson (lpr961)	Not strong enough. Need more than standard BNG	<p>In regards to biodiversity net gain, mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The Council will include the target of 10% as per the Environment Act 2021 but will express this as minimum so it is clear that this can be exceeded and a flexible approach is taken.</p>

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Nataliya Topliss (lpr802)	<p>Policy not supported.</p> <p>The proposed development on 170 acres of green land will have devastating effect on biodiversity and wildlife habitat. West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted.</p> <p>The comments relate to Policy SP17 and so will be considered as part of the Council's response to that policy. This policy and SP17 will safeguard biodiversity and seek a minimum 10% net gain in biodiversity.</p>
Councillor Tony Vickers (lpr537)	<p>We support this policy but would like to see mention of allotments here. Allotments have a high biodiversity value and therefore it is appropriate to specifically mention them here. They provide good wildlife mosaics and corridors between parks and private gardens in urban areas.</p> <p>It is best if the Council Ecologist advises on appropriate text. It is important that developers consider the need for allotments at a very early stage in site viability, as their location and size within a site can have major effects on layout.</p>	<p>Comments noted, it is acknowledged that allotments can make a positive contribution to biodiversity.</p> <p>Amend the supporting text to recognise the variety of spaces which can contribute to biodiversity value as follows -  <u>'The 2019 'State of Nature Report' indicates that biodiversity across the UK is continuing to decline and as such change is required in relation to how we manage land. The Report highlights that urbanisation can fragment landscapes by creating barriers between habitats, thus isolating some populations but also recognises the wide variety of green spaces which exist within urban environments including domestic gardens, parks, allotments, cemeteries, ponds, and road verges which can all add to biodiversity value.'</u></p>
Toby and Gail Woodhouse (lpr2021)	<p>Policy is not supported.</p> <p><i>(Extracted from main representation to SP17 Thatcham)</i>  Wildlife (SP11)  - the impact on local eco systems and wildlife will be significant. Whilst plans identify mitigating actions (open space) and reference sustainable development it is quite clear that this development of farmland and natural open habitat will destroy areas currently used and occupied by wildlife. The open spaces proposed in the development areas will not be enough either</p>	<p>Comments noted.</p> <p>The policy recognises the value and levels of importance of biodiversity in the District and requires development to conserve and enhance wildlife and additionally, provide for a net gain in biodiversity. It protects priority habitats and species of most importance and unless there are overriding reasons of public interest. Further, it seeks to improve the overall status of all wildlife in the future</p>

Respondent	Response	Council Response
	for the wildlife or the residents and the additional footfall, which is inevitable, will also impact wildlife on Bucklebury Common and the AONB.	through enhancement of existing habitats and providing more habitat to ensure the net gain.
<b>Landowners, site promoters and developers</b>		
Pegasus Planning for Calcot Park Golf Club (lpr2326)	<p>Policy is supported.</p> <p>This policy states that development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver net gain. Development proposals across the district will be expected to deliver 10% net gain for biodiversity either within the site boundary or as off-site compensation where appropriate.</p> <p>On a landholding of 81 hectares, with only 6.2 hectares proposed for residential development, there will be considerable scope for the provision of biodiversity net gain. This will be available not only for the 70 dwellings proposed by Calcot Park Golf Club (CPGC), but it could potentially be available for other smaller residential sites to utilise. At the application stage, a bio and geodiversity assessment will be undertaken to establish what measures should and could be taken to provide at least a 10% net gain. The results of surveys and recommendations by ecologist experts will be submitted with the application. This will ensure that the proposal will make a positive contribution to bio and geodiversity in the local area to the benefit of the local community, both in visual and well-being terms. Such improvements will ensure that CPGC contributes positively the bio and geodiversity of the locality for the foreseeable future.</p>	Comments noted.
Pegasus Planning for Newbury and Crookham Golf Club (lpr2052)	<p>Policy is supported.</p> <p>This policy states that development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver net gain. Development proposals across the district will be expected to deliver 10% net gain for biodiversity either within the site boundary or as off-site compensation where appropriate.</p> <p>On a land holding of 50 hectares, with only 2 acres proposed for residential development, there will be considerable scope for the provision of biodiversity net gain. This will be available not only for the 2 acres of residential development proposed by Newbury and Crookham Golf Club (NCGC), but it could potentially be available for other smaller residential sites to utilise. At the application stage, a bio and geodiversity assessment</p>	Comments noted.

Respondent	Response	Council Response
	<p>will be undertaken to establish what measures should and could be taken to provide a 10% net gain. The results of surveys and recommendations by ecologist experts will be submitted with the application. This will ensure that the proposal will make a positive contribution to bio and geodiversity in the local area to the benefit of the local community, both in visual and well-being terms. Such improvements will ensure that NCGC contributes positively the bio and geodiversity of the locality for many decades to come.</p>	
<p>Southern Planning Practice for The Saunders Family (lpr2118)</p>	<p>We support Policy SP11 and agree that new development proposals should seek to conserve and enhance the biodiversity on site.</p> <p>As mentioned earlier in the representations, the land at Coombe Bottom Farm is located within a Biodiversity Opportunity Area (BOA) on the current Local Plan Policy Map, and we believe its inclusion is an error. However we appreciate, as set out at paragraph 5.67 of the Local Plan Review Consultation Document, that the BOA does not represent a statutory designation or a constraint upon development, rather, they are the areas where biodiversity improvements are likely to have the most beneficial results at a strategic scale.</p> <p>The site currently comprises an area of maintained grassland used for grazing which is of low ecological value. If the site were to be developed for a residential use, the proposals could provide a significant biodiversity enhancement on site. The provision of trees and other native vegetation would create new habitats and encourage different species to use the site. Therefore, the site would help to achieve Policy 11 of the Local Plan review.</p>	<p>Comments noted.</p>
<p>Sovereign Housing Association (lpr2160)</p>	<p>Policy is neither supported nor not supported.</p> <p>SHA acknowledges there is a climate and biodiversity emergency and support local authorities who are aspirational with policies that seek to conserve and enhance valuable habitats through preservation, enhancement or replacement. It is noted the forth bullet point of policy SP11 requires new developments to deliver a minimum 10% biodiversity net gain (BNG). Whilst we fully support the principle of BNG we believe the LPR requirement duplicates emerging national policy set out in the Environment Bill (EB). The EB is currently passing through government and is likely to be enacted later this year. It is understood the EB proposal includes a transition period</p>	<p>Comments noted.</p> <p>In regards to biodiversity net gain, mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The Council will include the target of 10% as per the Environment Act 2021 but will express this as minimum so</p>

Respondent	Response	Council Response
	<p>where-by a statutory minimum 10% BNG will be required from all new development from Summer 2023.</p> <p>The Councils current LDS envisages adoption of the Local Plan in December 2022, meaning some schemes may be expected to implement the Councils BNG requirement a good 9 months earlier than the national statutory requirement. Whilst we recognise the benefits, we are concerned this could have an impact on housing delivery over the shorter term. This is likely to have a greater impact on those in housing need and could worsen local affordability.</p> <p>We believe the government's transition period is appropriate. We therefore suggest reference to BNG is either moved from SP11 to the supporting text and/or provided additional clarification around how it will be applied in line with national policy and guidance.</p>	<p>it is clear that this can be exceeded and a flexible approach is taken.</p> <p>The following text will be added to the supporting text: <u>'The Council will deliver Biodiversity Net Gain in line with latest national guidance and the Environment Act 2021.'</u></p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP12 Approach to Housing Delivery

#### (Proposed Submission LPR Policy: SP12 Approach to Housing Delivery)

Number of responses received: 83

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr748)	Typo spotted in 6.12 - SPR3	The typo in paragraph 7.24 will be amended from SPR3 to SP3.
<b>Statutory consultees</b>		
Newbury Town Council (lpr2261)	<p>We neither support nor object to this policy because we are not able to comment adequately on the method of arriving at the target number of dwellings. We note (6.6) that this is liable to change in any case and accept that there has to be a number here.</p> <p>Some doubts about the current methodology are raised by the inclusion in the Local Plan of some sites that are already largely built out (parts of RSA 6), others that have been recently refused for numbers of dwellings smaller than stated in the Plan (RSA 5), yet more that have had planning consent for some time (remainder of RSA 6, RSA 2). On the other hand, there are sites not specifically mentioned in the Plan at all that have had planning consent including substantial amounts of housing for some years, seemingly because they are within a DEA (Faraday Plaza in LRIE). Nowhere is this explained.</p>	<p>The government's standard methodology is used to determine the Local Housing Need (LHN), which forms the starting point for the housing requirement. At the time of the consultation on the emerging draft Local Plan Review (LPR) Regulation 18 consultation the government was consulting on changes to the formula, which would have led to a higher number for West Berkshire. The government's response to their consultation has, however, resulted in no change to the standard methodology for West Berkshire.</p> <p>There are several sources that will ensure a continuous supply of land for housing across the plan period. These include:</p>



Respondent (with lpr ref)	Response	Council Response
	<p>We wish to improve the aim of the policy in terms of climate change to allow loss of existing homes if it can be shown they are not habitable and that they can be replaced in situ with a net long-term gain in terms of tackling climate change and no net loss of habitable dwellings.</p> <p><b>Reason:</b> to assist with the aim of achieving carbon neutral by 2030 and also to upgrade properties that have unavoidably high carbon fuel usage, in accordance with the council's Housing Strategy.</p> <p><b>Change proposed:</b> add to last sentence "... including replacement of dwellings that are unavoidably expensive to heat by carbon fuels, where the net long-term cost (including cost in use) can be shown to be significantly reduced by re-build and there is no net loss in terms of numbers of dwellings on the development site."</p>	<ul style="list-style-type: none"> <li>• Retained Local Plan (ie. Core Strategy and Housing Site Allocation Development Plan Document) and Stratfield Mortimer Neighbourhood Development Plan (NDP) allocations;</li> <li>• Allocations in the Local Plan which are not being retained due to development being at an advanced stage of construction;</li> <li>• Existing planning commitments on unallocated sites</li> <li>• Existing planning commitments for communal accommodation (C2 use class);</li> <li>• Small site windfall allowance;</li> <li>• New sites allocated in the LPR; and</li> <li>• Sites to be allocated in neighbourhood plans.</li> </ul> <p>The contribution these sources of supply make to meeting the housing requirement are set in Table 2 of policy SP12.</p> <p>Several of the retained Local Plan allocations have been removed since the Regulation 18 consultation due to development being close to completion.</p> <p>The policy as it currently reads does not prevent redevelopment of dwellings and the policy for building sustainable homes and businesses (DM4) would apply to any redevelopment proposal as development plan policies need to be read together. No change is therefore proposed.</p>
Thatcham Town Council (lpr1399)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>We are not in a position to comment on how the target dwelling number has been obtained</p>	<p>The government's standard methodology is used to determine the LHN, which forms the starting point for the housing requirement. At the time of the Regulation 18 LPR consultation the government was consulting on changes to the formula, which would have led to a higher number for West Berkshire. The government's response to their</p>

Respondent (with lpr ref)	Response	Council Response
	<p>However, we do question whether historic predictions of housing demand are still relevant given the extraordinary changes brought about by both Covid and the exit from the EU which might change the relative attractiveness of different regions. We also note from external sources (BBC, Dec 2020) that "A computer-based formula used to decide where houses should be located has been "updated" to focus more on cities and urban areas in the North and Midlands.". We therefore seek clarity as to whether recent changes are being reflected in the housing growth forecast.</p> <p>The dominant labour demand in West Berkshire is related to professional services and employment from large business that are predominantly European facing. However, with the lack of support for professional services in the EU trade agreements, it is clear that there will be shift in employment, and European based businesses may shift their employment overseas.</p> <p>Whether this means that West Berkshire remains such a desirable place, driven partly by employment prospects, remains unclear.</p> <p><b>Section 6.</b></p> <ul style="list-style-type: none"> <li>• "Several sources will ensure a continuous supply of land for housing."</li> </ul> <p>We do not agree with this statement. There is such a heavy focus on a small number of sites, such as Thatcham NE, that the policy is in grave danger of failing should unanticipated delays occur.</p> <p>We recommend that housing supply should be more evenly distributed over a greater number of sites to reduce the risk of a failure to supply, and also to ensure every area has the ability to respond to increased population growth with appropriate investment in services.</p>	<p>consultation has, however, resulted in no change to the standard methodology for West Berkshire, with an uplift over the previous LHN only in the larger cities and urban centres, which include Reading.</p> <p>The Council's evidence base was prepared prior to Covid and the exit from the EU and, as Thatcham Town Council acknowledge, the implications of these remain unclear. Evidence will be updated for future reviews of the Local Plan.</p> <p>Paragraph 7.13 of the LPR sets out the various sources of housing supply that will ensure a continuous supply of land for housing across the plan period. North East Thatcham is one of the new sites proposed for allocation in the LPR. Alongside Sandford Park, it is the largest site and therefore forms a significant proportion of the housing land supply.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of over 7 years for the period to 2026/2027.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy</p>

Respondent (with lpr ref)	Response	Council Response
		which went through all stages of consultation, examination and adoption by the Council.
Wokingham Borough Council (lpr1466)	<p><i>Wokingham Borough Council's full representation is attached</i></p> <p><u>Housing need and supply</u></p> <p>Using the government's standard method, housing need within WBDC calculates as 513 dwellings per annum (dpa) at 1 April 2020. This equates to a total of 8,721 additional homes in the period 2020 - 2037.</p> <p>Policy SP 12 – 'Approach to Housing Delivery' states that:</p> <p><i>'Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum.'</i></p> <p>The minimum provision of homes under Policy SP 12 exceeds the current calculation of housing need (513dpa), being based on the slightly higher outcome of the 2019-based calculation (520dpa). This, and the range up to 575dpa, provides some flexibility to changes in the calculation of housing need.</p> <p>Notwithstanding, Policy SP 12 notes that 575 is not a ceiling or cap to development. Ultimately, the Plan seeks to meet and exceed the current calculation of housing need in full in accordance with national policy and guidance.</p>	<p>Noted that Wokingham Borough Council acknowledges and supports the Council's position that need will be met in full within the district over the plan period.</p> <p>On the issue of Reading's unmet need, clarification has been sought from Reading Borough Council (see response to Reading Borough Council (lpr1488) and the following additional text is proposed to be added to the supporting text section of the policy at paragraphs 7.6 to 7.9:</p> <p><u><i>Reading Borough Council have identified a shortfall of 230 dwellings that is anticipated to arise in the latter part of their current Local Plan period. The Reading Local Plan considers the period through to 2036.</i></u></p> <p><u><i>The local authorities which make up the Western Berkshire HMA have agreed a Statement of Common Ground for the purposes of Local Plan-making. This continues to recognise Reading's unmet need set out in the Reading Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading's need as calculated by the SHMA, not by any alternative calculations of need.</i></u></p> <p><u><i>Reading have identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises.</i></u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>Taking account of existing commitments, allocations and anticipated windfall developments (which together total 8,114 dwellings), a land supply for a further 1,661 dwellings is needed against the requirement of 9,775 homes. This figure reflects the upper end of the range (i.e. 575 dpa) to allow for flexibility over the lower figure for nondelivery, phasing issues, etc. Analysis of the proposed spatial strategy and allocations to meet this is provided below under 'Proposed spatial strategy and housing site allocations'.</p> <p>The government's December 2020 changes to the standard need formula have no direct impact on WBDC.</p> <p>On the issue of housing need and supply, it is recommended that Wokingham Borough Council (WBC) acknowledges and supports the WBDC position that need will be met in full within the district over the plan period.</p> <p><u>Unmet housing need from Reading Borough Council</u></p> <p>Reading Borough Council's (RBC) Local Plan (adopted November 2019) identifies a shortfall of 230 dwellings over the plan period 2013 – 2036 against the housing need identified within the Berkshire Strategic Housing Market Assessment (2016).</p> <p>WBDC states in the Plan and supporting documents that there has been no request from other local authorities within the Western Berkshire Housing Market Area (HMA) (i.e. Bracknell Forest Council (BFC), RBC and WBC) to accommodate any unmet need and that the potential shortfall from RBC no longer exists.</p>	<p><u>No shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA.</u></p> <p>The comments relating to the expectation that West Berkshire Council and Bracknell Forest Council would accommodate any potential unmet need from Reading Borough Council is noted, but it is also recognised that Wokingham are still to undertake a review of their spatial options and it would seem premature to rule out the possibility of any contribution to meeting any unmet need from Reading.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Recent statements by the Deputy Leader for RBC suggest the view held by RBC is that unmet need still exists.</p> <p>It is important to note that the government's recent revision of the standard method (published 16 December 2020), now requires a 35% uplift to be applied to RBC's housing need to account for the authority being within the country's top 20 largest cities and urban centres. Whilst statements from government expect the increased need to be met within the largest cities and urban centres themselves, and not passed to neighbouring local authorities, engagement and clarification is required from RBC.</p> <p>As previously expressed to all local authorities within the Western Berkshire HMA, WBC expects any potential unmet need from RBC to be met by WBDC or BFC, given the existing comparatively higher level of housing need in WBC. In addition, the change in emergency planning arrangements around AWE Burghfield has resulted in substantial objections from the Ministry of Defence towards the Grazeley garden town proposal which was a central plank of WBC's Draft Local Plan. As a result of the changed circumstances, a review of spatial options for the WBC local plan will be undertaken.</p> <p>At the time of writing it is not possible to say how future developments needs will be accommodated within WBC, or indeed whether there will be any issues on which cooperation will be sought from neighbouring local authorities, such as unmet needs. Any housing delivered within the wider HMA is suitable in principle to address any shortfall from the other local authorities regardless of proximity.</p> <p>It is recommended that clarification is sought regarding the issue of unmet need arising from RBC. It is further recommended that WBC reaffirms that it</p>	

Respondent (with lpr ref)	Response	Council Response
	would expect WBDC and BFC to accommodate any potential unmet from RBC.	
Basingstoke & Deane Borough Council (lpr1481)	<p><i>Basingstoke and Deane Local Plan Update</i></p> <p>As you will be aware, Basingstoke and Deane Borough Council (BDBC) has started work on a Local Plan Update to cover the period to at least 2039. The council undertook an Issues and Options consultation in Autumn 2020 and intends to consult on a draft Plan (Regulation 18) in winter 2021/22. This would lead to submission in Spring 2023 and adoption in Spring 2024. Although policy development is at an early stage, at this time the council does not anticipate there being any unmet needs arising from Basingstoke and Deane borough that would need to be met by West Berkshire Council.</p> <p><i>Comments on WBC Plan</i></p> <p>BDBC wishes to ensure that West Berkshire Council is meeting its needs in full and that the Plan takes account of any potential impacts upon the borough and its residents.</p> <p>BDBC is keen to continue to engage in suitable discussions under the Duty to Cooperate, in relation to the issues set out above and those discussed at our meeting in late 2020.</p>	Comments noted, particularly that no unmet need from Basingstoke and Deane is anticipated.
Reading Borough Council (lpr1488)	Policy SP 12 makes provision for a total of 8,840 to 9,975 additional homes per annum between 2020 and 2037, which equates to 520 to 575 homes per annum. Whilst the 520 figure is derived from the standard methodology for assessing housing need based on most recent figures (as set out in paragraph 6.2), it is not clear from the Local Plan how the upper figure of 575 has been identified. Whilst the Council welcomes any commitment to deliver additional housing above the level set out in the standard	The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met. The upper end of the range has been proposed to allow for approximately 5% additional homes. The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against

Respondent (with lpr ref)	Response	Council Response
	<p>methodology (subject to other considerations, in particular the provision of the necessary supporting infrastructure) it would be important to understand how critical figures such as this have been arrived at, and whether it is expected that this would cover any of Reading's identified unmet need.</p> <p>Regarding Reading's unmet need, paragraph 6.3 makes the comment that "There has been no request to take unmet need from other authorities within the identified Housing Market Area, or from any other adjacent authority. In 2018 there was a possibility of some unmet need in Reading Borough, but this is no longer the case." RBC does not consider that this is an accurate reflection of the current circumstances, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. A formal request was made by RBC to WBDC as well as to Wokingham Borough Council (WBC) on 24<sup>th</sup> January 2017 to consider meeting some of Reading's anticipated unmet needs for housing (which at the time was expected to be around 1,000 homes). WBDC had not yet carried out the capacity work to understand whether there would be scope to assist in meeting these needs. As you will be aware, the Reading Borough Local Plan was adopted in November 2019, and this continued to identify a shortfall in meeting Reading's needs, albeit much reduced from 1,000 homes to 230 homes, with the Local Plan stating that these needs were expected to be met elsewhere in the Western Berkshire Housing Market Area (comprising West Berkshire, Reading, Wokingham and Bracknell Forest). The formal duty to co-operate request from 2017 has never been withdrawn by RBC, and this matter was raised in RBC's response to the Regulation 18 consultation on West Berkshire Local Plan Review to 2036 submitted in December 2018. As far as RBC is concerned, this remains an open request.</li> <li>2. A Memorandum of Understanding was signed in October 2017 by all four authorities within the Western Berkshire HMA, including WBDC and RBC, regarding Reading's unmet housing need. This agreed that Reading had an unmet need to 2036, estimated at the time as 500-1000 dwellings, and agreed that this unmet need should be met within the Western Berkshire HMA. It further agreed that "the four</li> </ol>	<p>substantially higher numbers than the housing need based on the standard methodology.</p> <p>The local authorities which make up the Western Berkshire Housing Market Area (HMA) have agreed a Statement of Common Ground for the purposes of Local Plan-making. This continues to recognise Reading's unmet need set out in the Reading Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading's need as calculated by the Berkshire SHMA, not by any alternative calculations of need.</p> <p>As Reading Borough Council set out in their representation a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology.</p> <p>The shortfall of 230 dwellings was anticipated by Reading Borough Council to arise at the later part of their current plan period. Though the principle of meeting any unmet need within the HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan –making process, before the need arises.</p> <p>The following additional text is proposed to be added to the supporting text section of the policy (paragraphs 7.6 to 7.9) in recognition of Reading's unmet housing need:</p> <p><u>Reading Borough Council have identified a shortfall of 230 dwellings that is anticipated to arise in the latter part of their current Local Plan period. The Reading Local Plan considers the period through to 2036.</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>Western Berkshire HMA authorities will continue to work together to ensure that Local Plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need from Reading.” This MoU has not been withdrawn, and has not been superseded by any new version, and as far as RBC is concerned remains the current position.</p> <p>3. It is understood that paragraph 6.3 was drafted under the understanding that Reading’s housing needs had reduced from the 699 per annum in the Reading Borough Local Plan to 649 under the standard methodology (using 2020 affordability ratios and 2014-based household projections), and that this could be argued to eliminate the unmet need within the Local Plan (although RBC does not necessarily agree with the position). However, on 16<sup>th</sup> December 2020, after this document had been published, the government amended Planning Practice Guidance to change the way that the standard methodology operates for the 20 largest urban areas. This includes Reading, and it has resulted in Reading’s annual need under the standard methodology based on the most up-to-date figures increasing to 876 homes per annum. There is no realistic prospect of Reading being able to accommodate this within its boundaries and this means that, judged on the standard methodology, there is likely to be significant unmet need. Between 2021 and 2036, this would be in the region of 2,800 homes. At the current time, the need is 699 dwellings as established in the Reading Borough Local Plan, which results in a shortfall of 230, but a five-yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology.</p>	<p><u>The local authorities which make up the Western Berkshire HMA have agreed a Statement of Common Ground for the purposes of Local Plan-making. This continues to recognise Reading’s unmet need set out in the Reading Local Plan and the principle that the need should be met within the West of Berkshire area. This agreement relates only to Reading’s need as calculated by the SHMA, not by any alternative calculations of need.</u></p> <p><u>Reading have identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire HMA is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises.</u></p> <p><u>No shortfall has been identified from other adjacent authorities or any of the other authorities within the Western Berkshire HMA.</u></p>
Bucklebury Parish Council (lpr1716)	<i>Extract from full representation on SP17 (lpr1688)</i>	The preparation of the evidence base for the Local Plan Review (LPR) was largely undertaken prior to the COVID



Respondent (with lpr ref)	Response	Council Response
	<p><b>9. Approach to Housing Delivery (SP 12)</b></p> <p>The world has changed in the last 12 months. We need to re-look at the assumptions on which plans were previously based to see if they are applicable now and if they will be relevant in the future.</p> <p><b>Housing Needs</b></p> <p>The local housing needs assessment requiring 520-575 dwellings pa to be built needs to be revisited in the light of changed circumstances. This target was set before the onset of the pandemic, the focus on rebalancing the economy and the UK's exit from the EU. We are already seeing changing working practices and higher rates of unemployment. There will be lower disposable incomes for many after tax rises to pay for the huge cost of the pandemic. The housing need methodology does not take account of the loss of the Grazeley site. Taken together all these new factors are highly likely to reduce the housing need in West Berkshire and call into question the numbers of houses required in Thatcham (THA20) to satisfy that need. Furthermore, the Government published the new standard method for assessing local housing need in December 2020. This included a spreadsheet containing the indicative figures for each local authority in the country. The figure for West Berkshire is 513 dwellings per annum.</p> <p><b>Housing Supply</b></p> <p>The requirement was to provide a land supply for approx. 9775 houses until 2037 now 8,721 under the December 2020 calculation. According to the consultation document 8,114 have been identified excluding the proposal for NE Thatcham (THA20).</p> <p>WBC's calculations have used approximately 114 houses per annum as windfall. If our understanding is correct, over the plan period between 2006 and 2020 there have been 2900 approved sites, some 190 per annum. WBC</p>	<p>19 pandemic, the impact of which will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p><b>Housing Needs</b></p> <p>The local housing need is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to the housing affordability ratios published in March 2022).</p> <p>Paragraph 61 of the 2021 NPPF states:</p> <p><i>To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</i></p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>have estimated 140 for this plan period but reduced it by the overage of approvals outstanding from the previous plan period. This would seem to be overly cautious and pessimistic and this reduces the windfall value in the WBC forecast by approximately 400 houses.</p> <p>The estimate also adjusts down the availability of housing in the Sandleford Park scheme by 1/3 and it states WBC are only expecting 1000 of 1500 home provision to be built within the plan period. Why is this adjustment necessary? If this process is about land supply for properties, there is no reason to adjust.</p> <p>Only looking at these two items potentially satisfies the shortfall in total. In addition, there is a long list of sites within the HELAA of which 122 hectares is on pre-developed land and not included for development. Why is WBC looking to use new Greenfield sites when there are clearly other options available?</p> <p>There is absolutely no need for 2,500 houses to be considered when the shortfall is a maximum of 607. There are many ways of mitigating the numbers that may be required from this development.</p>	<p><b>Housing Supply</b></p> <p>The proposed housing requirement is for 8,721 – 9,146 net additional homes for 2022 – 2039.</p> <p>The windfall allowance has been based on the historic rate of delivery on small sites of less than 10 units. These types of sites are difficult to identify in advance. An average allowance of 140 dwellings per annum has been used, but outstanding permissions (where dwellings are either not started or under construction) have been deducted in order to avoid double-counting. Over the plan period of 17 years the allowance would imply delivery of 2,380 units (17x140) but 431 of these already have permission and are therefore already included in the supply figures.</p> <p>We are unclear how Bucklebury Parish Council's figure of 190 per annum has been derived.</p> <p>The Council needs to ensure that there is sufficient flexibility to meet the housing requirement by the end of the plan period and evidence indicates that large strategic sites have longer lead- in times than small and medium sized sites. At the time of the Regulation 18 consultation, there had been uncertainty regarding the timing of delivery at Sandleford Park and the Council took caution in the estimates of potential delivery in the plan period. However, the eastern part of the site now has outline permission. There is a planning application pending determination on the western part of the site.</p> <p>The process of selection of sites for allocation was set out in the Site Selection Background Paper, which will be updated for the Regulation 19 proposed submission consultation.</p>

Respondent (with lpr ref)	Response	Council Response
Oxford and Country Planning Ltd for Bucklebury Parish Council (lpr1921)	<p><i>Full representation relating to North East Thatcham strategic site attached to the online representation (lpr1920)</i></p> <p><b>Housing requirement in the light of the publication of the new standard method</b></p> <p>The Local Plan proposes to provide for between 8,840 to 9,775 net additional homes in the period to 2037, which equates to between 520 and 575 dwellings per annum (Policy SP 12).</p> <p>The supporting text states that, <i>using the 2014-based housing projections, and an uplift based on the ratio of house prices to workplace-based earnings the local housing need figure is 513 dwellings per annum using a baseline of 2020 (520 dwellings per annum using a baseline of 2019)</i>. The text goes on to say at para 6.6 that, <i>The Government has recently consulted on a revised standard method for calculating local housing need but at this stage it is not known how this will be amended following analysis of the comments received. It will therefore be necessary to keep Policy SP12 under review.</i></p> <p>The Government published the new standard method for assessing local housing need in December 2020. This included a spreadsheet containing the indicative figures for each local authority in the country. The figure for West Berkshire is 513 dwellings per annum.</p> <p>Whilst the figures from the standard method are minimum estimates of local housing need, local authorities may set housing requirements greater than the standard method or provide for less housing, subject to the provisions of the NPPF. Environmental, infrastructure capacity and other factors will ultimately determine the final housing figure contained within the Local Plan. Given the above, it is considered that the Local Plan as drafted is, at the upper end of the range, potentially providing for 1,000 more homes than required (513 x 17 = 8,721). This has a fundamental implication for the strategy of the Plan as a whole, including the proposed strategic allocation at North East Thatcham. Therefore, the Parish Council urges West Berkshire</p>	<p>At the time of the consultation the LHN was 513 dwellings per annum. The current LHN using the affordability ratios published in March 2022 is 513 dwellings per annum.</p> <p>It is accepted that the Council are proposing a housing requirement that exceeds the LHN. The objective is to boost housing supply and include sufficient flexibility to ensure that, as a minimum, the LHN can be met.</p>

Respondent (with lpr ref)	Response	Council Response
	Council to review its housing requirement in the light of the publication of the new standard method.	
Tilehurst Parish Council (lpr1983)	<p><i>Full representation from Tilehurst Parish Council and Tilehurst Neighbourhood Development Plan Steering Group is attached to online representation.</i></p> <p>The plan has no policies covering empty/unoccupied homes and how these numbers might be reduced. In 2015 there were 739 vacant/empty/disused residential properties and 170 similar commercial properties in West Berks (obtained via FOI request). This was not broken down by ward or Parish. WBC should consider having plans/policies to get as many of these houses back into use as possible.</p> <p>The Plan contains little (if any) direct mention of providing accommodation for homeless people and rough sleepers.</p>	<p>These are issues that are largely outside the land use planning scope of the Local Plan. The LPR does have a focus on re-use of brownfield land and policies would support the redevelopment of housing which is no longer fit for purpose.</p> <p>The Council can offer financial assistance to owners of empty properties to help bring them back into residential use. The Council also has a Preventing Homelessness and Rough Sleeping Strategy.</p>
Cold Ash Parish Council (lpr1737)	<p>The upper number of the range of annual new build homes is stated as not a cap or maximum, which reduces certainty and the reliability of the Plan for residents and any other organisations wishing to know the impact of development over the life of the Plan.</p> <p>Moreover, with the new Government Planning Framework being trailed last year, it is highly likely that a new National Planning Policy Framework will take effect during the Local plan period, which presumably will increase the likelihood of extra housing targets being applied.</p>	<p>The upper end of the range can be seen as a target but it would not be appropriate to refuse otherwise acceptable applications should that target be achieved before the end of the plan period. There can never be certainty over numbers of homes that will be delivered and the plan will be subject to review.</p> <p>If the Government introduce a new planning system as it has proposed then the next review of the Local Plan will need to conform to the new national policies. The White Paper did propose that housing requirements for local authorities be set by central government, but there is as yet no clarity on how this calculation will be made.</p>

Respondent (with lpr ref)	Response	Council Response
Oxfordshire County Council (lpr2195)	<p>West Berkshire is a unitary authority which shares boundaries with Vale of White Horse District Council and South Oxfordshire District Council. Oxfordshire and West Berkshire both have the A34 running through them, which links the south coast with the midlands.</p> <p>Strategic cross boundary issues include matters relating to the A34 and provision for students who may cross our administrative boundary to access educational facilities. Oxfordshire County Council is also working with authorities in the area regarding crossing the Thames at Reading.</p> <p>This is the third Regulation 18 consultation for the West Berkshire Local Plan Review. The last Regulation 18 consultation was in November 2018. Whilst we haven't commented to date and have no particular comments to make now, please add us to your database to notify us of your consultations.</p> <p>Within West Berkshire the largest settlement is Newbury, then Thatcham and the urban areas of Tilehurst, Purley on Thames and Calcot, close to Reading. The population estimate of the District is 158,400 (mid 2019). The North Wessex Downs Area of Outstanding Natural Beauty (AONB) covers 74% of West Berkshire and parts of Oxfordshire too.</p> <p>Policy SP 12 'Approach to Housing Delivery' in the current consultation, details provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037. This policy indicates the housing requirement as a range: 520-575 dwellings per annum.</p> <p>The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA, Feb 2016) found that West Berkshire has a strong functional relationship with Wokingham Borough, Reading Borough and Bracknell Forest. As a result, there has been much collaborative working between these authorities on housing matters and associated infrastructure. It is understood that there is no unmet need from other authorities. The supporting text for Policy SP 12 'Approach to Housing Delivery' states: 'in</p>	<p>Comments are noted.</p> <p>The issue of unmet need is covered in the response to Reading Borough Council (lpr1488).</p> <p>The Grazeley proposal would have largely met the housing needs of the wider Reading area and would have only gone a limited way towards meeting West Berkshire's housing needs. Even without the concerns due to the proximity of AWE, the lead in time for this development meant that it was never considered appropriate to include in the housing supply for the Local Plan period to 2039.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2018 there was a possibility of some unmet need in Reading Borough, but this is no longer the case.'</p> <p>We note that the main growth areas in West Berkshire are the Newbury and Thatcham areas, where two strategic urban extensions are proposed; the first a greenfield site to the south of Newbury (Sandleford Park), already allocated in the Core Strategy, where approximately 1,500 homes could be developed, and the second another greenfield site to the north east of Thatcham for approximately 2,500 homes.</p> <p>The proposed 'Garden Town' at Grazeley, which was a joint proposal by West Berkshire, Wokingham and Reading to accommodate up to 15,000 new homes on a site spanning the three boundaries, is no longer included in your Local Plan proposals due to concerns about the proximity of the site to the Atomic Weapons Establishment at Burghfield. It is understood that if new development at Grazeley progresses, it will be entirely within Wokingham Borough and Reading Borough. Given the significant size of the Grazeley Garden Town proposal, Oxfordshire County Council remains interested in how plans progress.</p>	
Greenham Parish council (lpr900)	The rules associated with housing allocation are under review and ever changing, which makes it hard to rely on this Housing delivery policy and support it.	Though we are going through a period of changes to national planning policy we are required to review the Local Plan and must work within the boundaries of current policy. In terms of the calculation of local housing need, it was confirmed shortly after this consultation commenced that the formula would not be amended for West Berkshire.
Hungerford Town Council (lpr147)	Agree with policy	Support noted.
Shaw-cum-Donnington Parish Council (lpr206)	<p>SP12 Approach to housing delivery.</p> <p>We support this policy.</p>	<p>Support noted.</p> <p>See response to Reading Borough Council (lpr1488) with regard to Reading's unmet need.</p>

Respondent (with lpr ref)	Response	Council Response
	6.3 We note that there is no request to take unmet needs from other authorities. We hope this continues. We believe new dwellings should be for the needs of the District and to provide them for other districts could encourage more commuting.	
Stratfield Mortimer Parish Council (lpr401)	Agree with policy	Support noted.
<b>General consultation bodies</b>		
Newbury Society (lpr1147)	<p><b>Total housing numbers.</b></p> <p>In the emerging draft of the Local Plan 2020-2037, West Berkshire Council has opted for a larger scale of development than indicated by following government calculations. These calculations assess local need as 513 houses per year, but WBC has opted for a target figure of 575 houses per year, 62 houses higher. In other words, over the 17 years of the plan WBC has chosen to increase the target by over 1,000 houses more than the assessed need. Reducing the total figure by this amount, or a substantial portion of it, would be much more sustainable, and lead to a higher quality of life for West Berkshire residents than the level of development currently proposed.</p>	<p>At the time of the consultation the LHN was 513 dwellings per annum. The current LHN using the affordability ratios published in March 2022 is 513 dwellings per annum.</p> <p>It is accepted that the Council are proposing a housing requirement that exceeds the LHN. The objective is to boost housing supply and include sufficient flexibility to ensure that, as a minimum, the LHN can be met.</p>
Reading West Berkshire Labour Party Branch (lpr1179)	<p>The local plan should include a commitment to return empty or unoccupied houses to housing stock. Figures from a few years ago showed over 700 empty houses and additional commercial properties that were empty in West Berkshire. Where necessary the council should use its powers to ensure that property is returned to the use for which it is intended. This could make a significant impact on meeting housing needs and reduce the pressure for new build.</p> <p>Add a new section under “Meeting Housing Need” covering the recovery of empty houses and adopting the points made in answer to question 2 above.</p>	<p>These are issues that are largely outside the land use planning scope of the Local Plan. The LPR does have a focus on re-use of brownfield land and policies would support the redevelopment of housing which is no longer fit for purpose.</p> <p>The Council can offer financial assistance to owners of empty properties to help bring them back into residential use.</p>

Respondent (with lpr ref)	Response	Council Response
Home Builders Federation	<p>Whilst we would agree with the Council's assessment that housing needs using the standard method results in a minimum requirement of 513 dwellings per annum (dpa) it will be important to recognise that there may be situation where the Council will be required to deliver more than this minimum. Firstly, the Council will need to engage closely with neighbouring areas to ensure that they are able to meet their own housing needs. The NPPF is clear in paragraph 60 that it will also need to take account of unmet needs in neighbouring areas. The Reading Local Plan for example identified a shortfall in their delivery that would need to be delivered in a neighbouring Borough. The Council will need to establish whether this is still the case as well as engaging with all other neighbouring areas to establish whether there are any unmet housing needs that could be addressed in West Berkshire.</p> <p>The Government have also recognised that there may be scenarios where needs are likely to be higher than that expressed in the standard method due to, for example, improvements in infrastructure or the adoption of growth strategies. These scenarios are outlined in paragraph 2a-010 of Planning Practice Guidance but the Council must recognise that these are just three examples and other situations may well need to be considered. Therefore, it will be important that strategic infrastructure improvements, such as Crossrail for example, which could see an increase in the jobs created in the region or increased in migration due to improved transport links to London are carefully considered and whether they will require the Council to plan for more homes than the minimum required.</p> <p>In addition, the Council will need to consider whether there will be sufficient homes to support its expectations and aspirations for economic growth. The Thames Valley and Berkshire Local Economic Partnership clearly has considerable growth aspirations for the area as a whole and has identified worsening affordability and availability of housing as a serious constraint on future growth (2). It is therefore essential that the Council is can show that it is providing sufficient housing to meet any economic growth aspirations for the area. For example, the 2018 report 'OAN Sensitivity Testing – Western Berkshire Housing Market Area' estimated that West Berkshire would need to deliver 556 new homes to meet the expected levels of jobs growth in the</p>	<p>See response to Reading Borough Council (lpr1488) with regard to Reading's unmet need.</p> <p>Support for housing requirement which exceeds the LHN is noted.</p> <p>A number of smaller sites are included in the plan and there is a healthy supply of permissions that are anticipated to deliver in the early years of the plan period. The Council is well aware of the NPPF requirement to demonstrate at least 10% of the housing requirement on sites no larger than one hectare. A Housing Background Paper will accompany the publication version of the Local Plan Review and will demonstrate how this requirement has been met through allocations in the development plan and land identified in the brownfield register.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Borough. Whilst this evidence is now slightly dated it does suggest that the lower end of the range set out in SP12 would not supply sufficient homes to meet the Council's economic growth expectations. As such it will be important for the Council to ensure that housing needs based on the standard method are sufficient to support the economic growth expectations for the HMA.</p> <p><i>Housing delivery</i></p> <p>We note and welcome the Council's decision to prepare a plan that seeks to exceed the minimum number of homes they are required to deliver. The National Planning Policy Framework (NPPF) is clear at paragraph 11 that local plans must be flexible to adapt to rapid change and as such it must be expected for plans to deliver more homes than the minimum required. If plans seek to meet development requirements with no buffer in supply, then there is a far greater risk that needs will not be met in full. Any slippage in the delivery timescales of any site, or lower than expected windfalls for example will lead to supply being less than the minimum requirement and the plan failing to deliver one of its key objectives. As such, should the minimum number of homes the Council are required to deliver increase then the Council will need to maintain the same degree of buffer within their planned supply.</p> <p>The Council recognise that they are required to include a housing trajectory in the local plan. This is an essential part of any local plan as it provides a clear and transparent outline of both delivery expectations and requirements. It would also appear that the Council are proposing to use the annualised average of need across the plan period against which to assess supply. We would consider this to be the correct approach given that the Council appear to be able to show that this plan would provide for a five-year land supply on adoption at present. However, in our experience this situation can change rapidly, and it will be important that the Council has sufficient flexibility in supply early in the plan period in order to maintain supply without having to resort to a stepped trajectory. In particular we would suggest that the Council</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>seeks to ensure it has a range of smaller sites allocated in the local plan that can come forward quickly once the plan is adopted.</p> <p>On a similar point the Council will need to show that it there are sufficient sites in the local plan or on its Brownfield Register to deliver at least 10% of the homes need in West Berkshire as required by paragraph 68 of the NPPF. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country, resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80% following the introduction of the plan-led system in 1990.</p> <p>The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. This is why the Government, through the NPPF, now requires local authorities to allocate more sites of varying sizes and it is essential that the Council supports this objective.</p> <p><i>(2) Thames Valley Berkshire LEP Strategic Economic Plan 2011/16-2021</i></p>	
West Berkshire Green Party (lpr1835)	We believe that the potential contribution from windfall sites is underestimated, that as stated above there should be a push for mixed development in the industrial areas around Thatcham station, and that the proposed developments at Sandleford and NE Thatcham should be scaled back substantially or removed entirely. Given the council's stated plans for	The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. The Plan does, though, support development of previously developed sites within the settlement boundaries and any large and medium sites that do come

Respondent (with lpr ref)	Response	Council Response
	<p>the future of the London Road Industrial Estate, the absence of the LRIE from the draft plan is baffling when, even if the football ground is retained as an Asset of Community Value (which we would wish to see), there is scope for hundreds of homes on the LRIE site. As stated in our submission to the council's housing strategy, we would give priority to social and affordable homes on this site.</p>	<p>forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met.</p> <p>The LRIE has been assessed in the HELAA and through the site selection process in the same way as other sites. The issues identified in the HELAA include the need to retain employment land, flooding risks, potential adverse nature conservation impacts, loss of Green Infrastructure and an Asset of Community Value. It is proposed to be retained in the plan as a designated employment area, although it is recognised within the supporting text to Policy SP20 that the area has scope for comprehensive regeneration to maximise the potential of the site and that office development may be appropriate. There may be scope for mixed development and any application would need to be assessed against the Local Plan policies as a whole.</p> <p>The housing supply at March 2022 does not include housing on Land off Faraday and Kelvin Road as this planning consent has now lapsed.</p>
The Woodland Trust (lpr1026)	<p>The Woodland Trust does not take a position on the calculation of housing need and housing numbers but does wish to see explicit protection for ancient woodland in site allocation policies.</p> <p>The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development.</p> <p>Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging</p>	<p>Comments noted.</p> <p>The approach to ancient woodland within or adjacent to areas proposed for allocation is covered in the separate site allocation policies.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats.</p> <p>We welcome the protection for ancient woodland reflected in policy DC 14, that development resulting in the loss or deterioration of ancient woodland or veteran trees which are irreplaceable will be refused except in exceptional circumstances: this should also be reflected in site selection.</p> <p>Rather than the 15 m minimum buffer for ancient woodland specified in the housing sites, we propose a minimum 50 m buffer as set out below.</p> <p>We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.</p> <p>The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development.</p> <p>We recommend policy stating that where development proposals may affect ancient woodlands, including translocated woodlands (translocated ancient woodlands will be treated the same as if they are ancient woodland), veteran trees, and their immediate surroundings, the following principles shall be used to guide both site selection and the design of development:</p> <ol style="list-style-type: none"> <li>1. Avoidance of harm; and</li> <li>2. Provision of unequivocal evidence of need and benefits of the proposed development; and</li> <li>3. Provision of biodiversity net gain; and for the design of development:</li> <li>4. Establishment of the likelihood and type of any impacts; and</li> <li>5. Implementation of appropriate and adequate mitigation, compensation, and management measures that respect the features and characteristics of the veteran trees and/or ancient woodland; and</li> </ol>	

Respondent (with lpr ref)	Response	Council Response
	<p>6. Provision of adequate buffers; and 7. Provision of adequate evidence to support development proposals.</p> <p>Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p> <p>Further information is available in the Trust's <i>Planners' Manual for ancient woodland (2019)</i>.</p>	
Rural Solutions (lpr2307)	<p>We welcome the approach that the target figure of 575 dwellings per annum 'does not constitute a ceiling or cap to development' given the importance housing can bring a whole wealth of benefits to local people if delivered in the right way. This policy refers back to Policies SP1, SP3 and DC1 we have already provided commentary on suggesting an 'added' category in which development could be considered.</p> <p>The other option to explore is a "Community-Led Development" policy similar to COM9 in Test Valley's Local Plan. This seeks to take a positive approach to sustainable new development, in a strong rural economy, through the retention and development of local services and community facilities in villages, such as local shops, meeting places, schools, sports venues, cultural buildings, public house and places of worship. Proposals can be supported by evidence that there is a need for the development to maintain or enhance the sustainability of the settlement / wider village cluster through</p>	<p>Support for approach noted.</p> <p>Policy SP18 of the LPR does include reference to support for housing schemes initiated by local communities.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the delivery of community benefit. The scheme would need to demonstrate that the community has been involved in the preparation of the proposals. This is less cumbersome than preparing a Neighbourhood Plan, but can take into account the long-term aspirations of Village Design Statements or Parish Plans or views of the wider community. A small-scale residential scheme which is market-led can deliver indirect benefits in terms ensuring longevity of existing services.</p> <p>This type of small-scale windfall sites can be delivered quickly, something important when the construction industry and associated housing trajectories would have been impacted / output slowed significantly during the Covid-19 pandemic.</p> <p>The above ambitions, namely the Village Clusters approach, could be integrated in Policy SP15 as an overall windfall target. This would help to achieve the supporting text which states:</p> <p><i>“The special characteristics of the North Wessex Downs AONB mean that development will be modest, helping to meet local needs, support the rural economy and sustain local facilities in accordance with Policy SP2”.</i></p>	
CPRE (lpr2454)	<p><b>West Berkshire &amp; East Berkshire Combined Comments</b></p> <p><b>Housing Numbers and their effect:</b></p> <p>It is vital not to rush into new development so that we can ensure the infrastructure is in place and that environmental damage is prevented rather than rushing into unnecessary house building. The planned expansion needs to take account of roads, water conservation, waste disposal and energy resources as well as the social considerations. Once the infrastructure and environmental policies are in place housing can follow – not the other way round. Concentrating population in rural areas increases dependence on cars and roads and the effect this has on climate change. The AONB and rural areas need full recognition as they are vital</p>	<p>Infrastructure requirements will be set out in the Infrastructure Delivery Plan to ensure that infrastructure is in place at the appropriate time.</p> <p>It is considered that the LPR does contain policies for the rural areas which include the conservation and enhancement of nationally protected landscapes and the wider countryside. The Council does however, disagree with the CPRE that affordable housing is not compatible with the scale of transport and social infrastructure available in rural areas. It will continue to seek affordable housing to help meet the needs of those living in the rural areas of the District and in so doing support the vitality of those communities.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>components of “Quality of Life” with outstanding landscapes to be protected by everyone in the District and a boost to the economy. Active planning is needed for rural areas and recognition of their particular needs. Rural issues and the conservation and enhancement of nationally protected landscapes and the wider countryside should have stronger representation within the Review. Key workers and affordable housing in rural areas are not compatible with low-income households as public transport and social facilities are not as numerous as those in urban areas of West Berkshire.</p> <p>The use of Brownfield or previously developed land would solve the use of the destruction of greenfields and green gaps and provides an opportunity for removing some of the derelict and local eyesores to breathe new life into areas that need regeneration. A large number of sites could be transformed into the homes needed in West Berkshire.</p> <p>The Government target of 300,000 homes was based on information available from the 2014-based projections– the updated figures from ONS identify lower levels of household growth, which would reduce the number of homes required in West Berkshire and save unnecessary destruction of the green spaces. The current draft of the Local Plan proposes 8840-9775 net additional homes which is too high to be accommodated without sacrificing valuable agricultural land and land used for recreation and the housing calculations need to be reviewed. The ONS household data for 2018-2028 gives growth for West Berkshire as 2482 and with windfall sites this total is likely to be exceeded. West Berkshire is in a strong position to contest the number of housing units required with Government, especially against a backdrop of a seven-year land supply.</p> <p><b>General</b></p> <p>The WBC Local Plan consultation proposes 8,840 to 9,775 net additional homes; some 520– 575 pa. We think these figures are too high and the 'housing need' calculations need to be reviewed in the light of changing government guidance and the recent withdrawal of its 'algorithm'. Also the</p>	<p>Policies do encourage the use of brownfield land and direct development to settlements with settlement boundaries where there are opportunities for development on previously developed land. But the Council needs to be able to demonstrate that the housing requirement can be met in a plan- led fashion rather than relying on brownfield land to come forward at the appropriate time.</p> <p>Central government remains committed to the target of 300,000 homes per annum to help solve the housing crisis. The government's standard methodology, which remains based on the 2014-based household projections, is used to determine the Local Housing Need, which forms the starting point for the housing requirement. It is not considered that there are exceptional reasons to deviate from this methodology. The algorithm used to calculate local housing needs has not been withdrawn but only amended for the largest urban settlements in the country, which includes Reading.</p> <p>The housing requirement figure needs to show the extent to which the identified housing need can be met over the plan period. The HELAA assesses land availability and there is no evidence to show that the minimum housing need cannot be met in the district.</p>

Respondent (with lpr ref)	Response	Council Response
	most recent ONS household forecast data 2018 - 2028 gives West Berkshire's growth as 2482, There is the usual range of sites put forward in our towns and villages and we note WBC now has over 7-year land supply satisfying the >5 year need, and has done well with slight excess housing numbers in 2019 and 2020.	
<b>Other stakeholders</b>		
Peter Besnet (lpr30)	Philosophically I do wonder about the number of new houses required. Whilst the population at large is generally ageing, family sizes are probably at replacement level. Newbury is a busy town, but hardly booming with job creations.	The government's standard methodology, which remains based on the 2014-based household projections, is used to determine the Local Housing Need, which forms the starting point for the housing requirement. It is not considered that there are exceptional reasons to deviate from the standard method in establishing housing need.
Daniel Musker (lpr987)	<p><b>Development Strategy</b></p> <ul style="list-style-type: none"> <li>• The Local Housing Need (LHN) for West Berkshire is 513 dwellings per annum</li> <li>• The Local Housing Need Methodology and Household Projections in England (Office for National Statistics) are based on statistical modelling and do not take into account the amount of available developable land within each local authority.</li> <li>• 85% of the land within WBC is excluded from development potential (AONB and flood plains).</li> <li>• I believe that the figure of 513 dwellings per annum is disproportionate to the amount of available developable land in West Berkshire.</li> </ul>	<p>The assessment of local housing need takes no account of land supply. It is purely based on the 2014-based household projections with an uplift to reflect affordability issues.</p> <p>The housing requirement figure needs to show the extent to which the identified housing need can be met over the plan period. The HELAA assesses land availability and there is no evidence to show that the minimum housing need cannot be met in the district.</p>
Roger Frankum (lpr1189)	While I have some sympathy with the West Berks Council in finding space for its allocation of new houses, I really think the problem needs looking at again.	The housing requirement, as opposed to the local housing need, is not currently set by central government. The housing requirement figure needs to show the extent to which the identified housing need can be met over the plan period. The HELAA assesses land availability and there is



Respondent (with lpr ref)	Response	Council Response
	<p>I would have thought that the first thing to do following the elimination of the Grazeley area for possible housing, was to contact the government and point out the situation and request a reduction in its allocation.</p> <p>It appears that the policy is based on data that is already three years out of date. Since the time of its collection we have had Brexit and now the Covid crisis. Both of these events are leading to change demographics, partly because fewer people are needing to work in London, or need to visit their work-place every day. This must alter the spread of housing needs across the country.</p>	<p>no evidence to show that the minimum housing need cannot be met in the district.</p> <p>The preparation of the evidence base for the LPR was largely undertaken prior to the COVID 19 pandemic, the impact of which will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Penny Allum (lpr1173)	<p>I am writing to voice my strong objection to the 2,500 housing development proposed for the rural area north of Thatcham. This proposal shows both weak leadership and lazy planning by West Berkshire Council. The argument given in favour of the proposal seems to be, “We have to build this number of houses and if we don’t accept we may have something worse forced on us by central government, and there are no better alternative sites”. West Berkshire Council should be challenging the annual building requirement, as other local authorities have done. Given the recently extended exclusion zone around AWE, together with the AONB and flood plains, you should be arguing forcibly for reduction in this building requirement.</p>	<p>West Berkshire Council did make representations to central government on its consultation on proposed changes to the standard method for calculating local housing need. The proposed formula, which would have meant a significant increase for West Berkshire, was not implemented and the formula amended only for the largest settlements in the country. West Berkshire’s figure did not change.</p> <p>As outlined in response to lpr1189, above, this figure is not necessarily the same as the requirement but there is no evidence to show that the minimum housing need cannot be met in the district.</p>
Maria Kelly (lpr1243)	<p><i>(Comment on housing needs contained in representation lpr1242 on SP17)</i></p> <p>Housing needs – finally, it has to be asked whether those forecasts of West Berkshire’s future housing needs are still accurate and relevant in the aftermath of Brexit and the coronavirus episode. The long-term economic and social consequences of both those major events are uncertain, but pointers seem to be towards less growth, less inward migration, a lessening</p>	<p>The government’s standard method is used to determine the Local Housing Need, which forms the starting point for the housing requirement. The standard method formula was updated in December 2020 (although it did not result in a change for West Berkshire).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>need for workers to concentrate in the south-east of the country etc. I believe it would be irresponsible of WBC to move forward with any major infrastructure changes at this time, but most especially with large-scale housing projects such as in its SP17 proposal.</p>	<p>The preparation of the evidence base for the LPR was largely undertaken prior to the COVID 19 pandemic, the impact of which will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years</p>
Jason Allum (lpr1248)	<p><i>(Comment on housing numbers contained in representation 1246 on SP17)</i></p> <p><b>1. Housing Numbers</b></p> <p>The projected figure of housing required in West Berkshire is debatable. It is known fact that the number of places at Primary Schools are undersubscribed; this can only be due to a reduction in numbers of the younger generation. This is backed up from the graph on the West Berkshire Website, the actual population curve is flattening. This single fact seems to have been ignored. The demographic of the population is therefore, obviously changing and this needs to be taken into account in any calculation of the required housing.</p> <p>As the cost of housing in the South is expensive the older generation have and will continue to move west, downsize and live comfortably off the proceeds and their retirement plans which again reduces the requirement.</p> <p>Wilson homes development at the Racecourse is committed to provide 1,500 dwellings over a ten-year build. This figure of sustained development seems to be had been totally ignored. What is more, it would appear that they have been constructed on the Kennet flood plain. However, evidently this is not the case, as the authority has given full approval and consent as the location was situated on well-draining gravel beds. This precedence opens a lot more areas that could be used for housing, rather than the restricted options illustrated in the proposed plan which is both misleading and ambiguous. Building can take place within the valley floor and have the</p>	<p>The government's standard methodology, which remains based on the 2014-based household projections, is used to determine the Local Housing Need, which forms the starting point for the housing requirement. It is not considered that there are exceptional reasons to deviate from the standard method in establishing housing need.</p> <p>It is recognised that more recent population and household projections show a less rapid growth in population and households. The government are however committed to the delivery of 300,000 homes per annum and the standard method has been formulated to result in this number at a national level in order to address the housing crisis.</p> <p>The Racecourse development has not been ignored in the calculation of housing land supply. Table 2 shows the 465 units still outstanding (under construction or not yet started) as part of the category of outstanding dwellings with permission. The Racecourse development lies in Flood Zone 1, whereas significant areas to the east lie within flood zone 3. LPR Policy SP6 is clear that the sequential approach will be strictly applied across the District, steering vulnerable development away from areas affected by flooding.</p> <p>The first strategic objective of the LPR relates to the mitigation and adaptation to the effects of climate change</p>

Respondent (with lpr ref)	Response	Council Response
	<p>advantages of the current infrastructure. Importantly the visual impact is very much reduced than building on the northern slopes of Thatcham and the area adjacent to the AONB.</p> <p>Brexit has reduced the number of Europeans legally seeking work and citizenship, and indeed, there has been an exodus of casual labour in all regions. Covid 19 will alter the shape of our county and the nature of future employment. This will particularly impact the younger generation seeking employment and the lure of jobs not only in our area but nationwide.</p> <p>Importantly most of us, particularly those making these important decisions, will have gone to their maker and will not be around in 2036. We have seen that the younger generation will not tolerate environmentally damaging decisions. Greta Thunberg and her followers are just the tip of an iceberg of a younger generation with valid concerns on the environment and green issues. Our legacy is to look long-term and provide an environment suitable for future generations not a short-term reaction to ill-advised imposed quotas.</p>	<p>and numerous policies within the LPR relate to environmental issues. The purpose of the planning system is to contribute to the achievement of sustainable development, which includes the social objective of ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.</p>
Julian Dobbins (lpr1258)	<p><i>[Comments also in SP17 lpr1257]</i></p> <p><b>Failure to acknowledge housing needs based on household type, nor recognise the opportunities for commercial property re-use and town centre regeneration</b></p> <p>SP12 (Approach to Housing Delivery) states:</p> <p><i>Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.</i></p> <p>In the most recent ONS household forecast data, which covers the period 2018 - 2028, the entirety of West Berkshire's housing growth is described as</p>	<p>See response to lpr1248 (above) regarding household projections and housing need.</p> <p>Regarding housing mix, this is covered in Policy SP18 where Table 3 forms part of the supporting text. See response to lpr2457 in the Council responses on SP18.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2482, suggesting a 'necessary' annual figure (at least for the period covered) much lower than put forward in this proposal.</p> <p>Furthermore, regarding housing mix, the proposal (table 3 in SP12) shows that 60% - 70% of Market housing and 35% - 45% of Affordable housing will be 3 or 4 bedroom houses. ONS data shows that by far the highest growth in housing demand for West Berkshire will come from one-person households (10.7%, versus growth rates of -6%, -8.9% and -11.2% for families with 1, 2 or 3+ dependent children respectively).</p> <p>Given the housing mix suggested by the ONS forecast data, the proposal seems completely out of touch with the reality of local needs. In light of the changing nature of town centres, as retail moves on online, and an ageing population needing access to public transport, does it not make much more sense to repurpose unused commercial property for residential use, and in doing so change the declining nature of the high street, provide easier access to local facilities (especially for the ageing population) and reduce dependency on short car journeys clogging our streets and adding to the community's carbon footprint?</p>	
<p>Debby Reynolds (lpr1307)</p> <p>David Copas (lpr1433)</p>	<p><b>Response to consultation by West Berkshire Council on Emerging Draft West Berks LPR and Thatcham Growth Study Stage 3 report by David Lock Associates</b></p> <p><i>[NB. The response is recorded all together under lpr1305 for SP17 NE Thatcham, and separately in lpr 1306, 1308, 1309 and 1310. It keeps the original numbering of the recommendations.]</i></p> <p>Spatial strategy SP3 and 4 reflect many aspect of national policy. However there is no evidence that the policy alteration associated with exclusions around AWE Burghfield or Aldermaston have been taken into account centrally, thereby updating the national allocations. Residents can</p>	<p>The assessment of local housing need using the government's standard method takes no account of land constraints or supply. It is purely based on the 2014-based household projections with an uplift to reflect affordability issues. The Council made representations when consultation was undertaken on proposed changes to the methodology.</p> <p>The housing requirement figure needs to show the extent to which the identified housing need can be met over the plan period. The HELAA assesses land availability in West</p>

Respondent (with lpr ref)	Response	Council Response
	<p>rightly expect the Council to have challenged this at the highest level, including by Judicial Review, before producing a plan B such as the Thatcham development. All the materials in the review predate the dramatic alterations associated with online shopping and the COVID-19 pandemic. Therefore it is clear that the housing allocations are flawed in several respects.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 4 – provide clear evidence of UpToDate national comparable figures for developable land.</b> This must demonstrate that reassessment centrally has been undertaken, demonstrate the impact of this and COVID-19 are all accounted for in the Local plan review. Set demanding targets for conversion of brown field commercial property to residential.</li> </ul>	<p>Berkshire and there is no evidence to show that the minimum housing need cannot be met in the district.</p> <p>The preparation of the evidence base for the LPR was largely undertaken prior to the COVID 19 pandemic, the impact of which will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.</p> <p>The recommendation to provide national comparable figures for developable land is not one that the LPR can address. The recent White Paper included the proposal that the housing requirements for Local Plans be set centrally in the proposed new planning system but contained little detail on how that would be calculated.</p>
Graham Storey (lpr571)	<p>Too dependent on the out of town estates around Sandford and NE Thatcham</p> <p>The contribution that windfall sites is underestimated. There should be a push for mixed development in the industrial areas around Thatcham station, and the proposed developments at Sandford and NE Thatcham should be scaled back substantially or removed entirely.</p>	<p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. The Plan does support development of previously developed sites within the settlement boundaries and any large and medium sites that do come forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The Council, however, needs to be able to demonstrate that the housing requirement can be met in a plan-led fashion rather than relying on brownfield land to come forward at the appropriate time. The current protected employment areas are proposed to be retained as designated employment areas in order to support the needs of the local economy. This does not rule out appropriate mixed use development.</p>
<p>Jane Halliday (lpr614) Ian Halliday (lpr615)</p>	<p>There should be a much greater emphasis placed on the contribution that windfall sites can make, and consequently there should be a push for mixed development in the industrial areas around Thatcham station. The proposed developments at Sandford and NE Thatcham should be scaled back substantially or removed entirely.</p>	<p>See response to lpr571 (above)</p>
<p>Tim Hall (lpr649)</p>	<p>Over reliance on greenfield development</p> <p>Further study is required to assess existing uses and trends in:</p> <ol style="list-style-type: none"> <li>1. retail (shopping going online with major stores and chains folding and retail property values plummeting), and</li> <li>2. employment (more home working).</li> </ol> <p>With a view to finding substantially greater contribution to housing from brownfield sites and adaptation of property in town centres. Think of being another Chichester!</p>	<p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The preparation of the evidence base for the LPR was largely undertaken prior to the COVID 19 pandemic, the impact of which will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews.</p>

Respondent (with lpr ref)	Response	Council Response
Chris Willett (lpr1450)	<p><b>Challenge the Need</b></p> <p>The reduction in available land to develop has been reduced recently by the 30% increase in the areas of the DEPZ's around Aldermaston and Burghfield and I would urge WBC to challenge Central Government on the housing allocation.</p>	<p>West Berkshire Council did make representations to central government on its consultation on proposed changes to the standard method for calculating local housing need. The proposed formula, which would have meant a significant increase for West Berkshire, was not implemented and the formula amended only for the largest settlements in the country. West Berkshire's figure did not change. This figure is one for need and takes no account of land availability.</p> <p>As outlined in response to lpr1189, above, the housing need is not necessarily the same as the housing requirement but there is no evidence to show that the minimum housing need cannot be met in the district.</p>
Nataliya Topliss (lpr803)	<p>There is excessive stock of homes in Thatcham and no infrastructure to support the housing.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	See response to lpr807 on SP17 North East Thatcham.
Ian Parsons (lpr829)	<p>We hope that the formula for determining housing need is the same for all authorities.</p> <p>The replacement of old houses for new should be on a 'like for like' basis.</p>	<p>It is not the same for all authorities. The formula for determining local housing needs involves an uplift for the 20 largest urban centres in the country.</p> <p>Redevelopment of outdated housing with higher density development may be appropriate and result in greater efficiency of land use. Sites will be considered on a site by site basis.</p>
Councillor Tony Vickers (lpr538)	<b>Two Reasons:</b>	The housing requirement figure needs to show the extent to which the identified local housing need (LHN),

Respondent (with lpr ref)	Response	Council Response
	<p><b>1. The Numbers.</b> We are not confident that the total numbers of new dwellings required in the new Plan Period is stable enough for us to be able to comment adequately at this stage.</p> <p>Sites for far too many homes are proposed to be allocated. Section 6.12 under “Future Supply” says sites for a further 1,661 dwellings need to be found, however the sites proposed to be allocated would total 2039 homes an excess of 378.</p> <p>We note in 6.6 that the Council admits that the Government formula for deciding the target number is likely to change. We also query the figure for numbers of homes already delivered in the current Plan and await publication of the latest Annual Monitoring Report.</p> <p>We recognise that the target number is a minimum and not a ceiling. We also support making provision for more new homes than the minimum required in order to be sure that the Council can defend against any accusation that a 5-year housing supply cannot be met from allocated sites (6.18). However we believe the basis for the number should be understood more clearly by local people. At present it is not easy to understand even if one has been involved in the process.</p> <p>Currently it feels to us as though the number makes much insufficient allowance for ‘windfall’ and is too high – by up to 500 over the Plan Period, especially if London Road Industrial Estate alone is being promoted for at least 250.</p> <p>There is far too little allowance being made for windfall because only sites of under 10 units are being counted. ALL windfall sites should be included with the handful of large sites allocated elsewhere in the plan being subtracted. An allowance for homes converted from offices, etc. using permitted development rights should be included.</p>	<p>calculated using the government’s standard method, can be met over the plan period. The HELAA assesses land availability and there is no evidence to show that the minimum housing need cannot be met in the district. The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met. Though the LHN will change annually as affordability ratios are updated and the time period of the assessment rolls forward, these changes are not expected to be so significant that they would increase the LHN above the range proposed.</p> <p>The housing land supply does show a modest excess over the requirement target but there needs to be flexibility in the supply. Some sites may not deliver as expected or at all. Some may, as a result of this consultation and further evidence, not be allocated in the next version of the plan.</p> <p>The latest Annual Monitoring Report, for 2020/21 has been published and records the number of completions in the current plan period. The AMR for 2021/2022 will be published in January 2023.</p> <p>Support for provision of new homes above the minimum requirement is noted.</p> <p>A Housing Background Paper will accompany the publication version of the Local Plan Review and hopefully will clarify the basis for the housing requirement.</p> <p>The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. The Plan does, though, support development of previously developed sites within the settlement boundaries and any large and medium sites that do come</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Although we realise there is already some flexibility in the Plan, we wish to see more. Our own amendments to certain policies are designed to give additional flexibility to the Plan, given the uncertainty about the post-Covid and post-BREXIT environment, which is likely to add to the number delivered through windfall.</p> <p>Among the selected minor sites (RSA policies) are several which are already largely built out and a few which have been refused for smaller numbers than they are said in this draft to be capable of providing. These are itemised in some cases later in our responses. We realise that the list of smaller sites in the Plan and numbers therein will change but would hope that the evidence submitted at Reg.19 stage to the Inspector will be more robust.</p> <p>The contribution from permitted development (PD) conversions from offices has been extremely high in recent years and this source of “new” homes may be exhausted. However we would like to see more clarity about how this source has been treated in the calculation, given that it is equally possible that many of them may never actually be occupied because of their poor quality and changes in the housing market. This could result in a technical loss of net housing numbers.</p> <p><b>2. We wish to see mention of Regeneration here.</b> In a "Housing delivery approach" the need to improve the quality of existing homes through regeneration, with a focus on tackling climate change through improved insulation and reducing fuel poverty, is as important as supply of new homes and will involve 'development'. Recent Government announcements have highlighted this. This policy should be linked to the Housing Strategy.</p> <p>This will assist with the aim of achieving carbon neutral by 2030 and also upgrade properties that have unavoidably high carbon fuel usage, in accordance with the council's Housing Strategy.</p>	<p>forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met. The Council needs to be able to demonstrate that the housing requirement can be met in a plan- led fashion rather than relying on brownfield land to come forward at the appropriate time.</p> <p>The LRIE has been assessed in the HELAA and through the site selection process in the same way as other sites. It is proposed to be retained in the plan as a designated employment area, although it is recognised within the supporting text to Policy SP20 that the area has scope for comprehensive regeneration to maximise the potential of the site and that office development may be appropriate. There may be scope for mixed development, including residential, and any application would need to be assessed against the Local Plan policies as a whole.</p> <p>Cllr Vickers argues for an allowance for permitted development of offices to homes but goes on to say that the supply may be exhausted. This highlights the uncertainty of relying on the continued delivery of this type of housing to meet the identified need. There is very little basis for calculating a windfall allowance for office conversions which would be applicable across the plan period.</p> <p>The existing housing allocations in the HSA DPD have been rolled forward, but where the site is completed or where construction is underway, they will be excluded from the LPR. All sites will also be reviewed to take account of any representations and/or additional information.</p> <p>With regard to the inclusion of permitted development in the calculation of housing supply, where prior approval has</p>

Respondent (with lpr ref)	Response	Council Response
	<p>No change to the numbers at this stage. We first wish to see the figures thoroughly checked by officers and the basis for windfall numbers – especially from PD - reviewed.</p> <p>We also wish to see a policy here to allow loss of existing homes if it can be shown they are likely not to remain habitable through the Plan Period but they can be replaced <i>in situ</i> with a net long term gain in terms of tackling climate change and no net loss of habitable dwellings.</p> <p>Suggestion: add to last sentence “.... including replacement of dwellings that are unavoidably expensive to heat by carbon fuels, where the net long-term cost (including cost in use) can be shown to be significantly reduced by re-build and there is no net loss in terms of numbers of dwellings on the development site.”</p>	<p>been granted, the units are included in the supply (see Table 2 in policy SP12). It is quite likely that not all these will be built out and of course more will be continue to be permitted. The uncertainty, particularly over the contribution of office to residential conversions is why the plan needs to have the flexibility to be able to show higher potential supply than the minimum requirement.</p> <p>Improvement to the quality of existing homes is largely outside the scope of the LPR although any development requiring planning permission would need to accord with the DM policies such as Proposed Submission Policy DM4 Building Sustainable Homes and Businesses.</p> <p>We note that no change is sought to the housing numbers. We can also assure Cllr Vickers that figures are carefully checked: monitoring is carried out on an annual basis. The Housing Background Paper to accompany the Reg 19 consultation will include the reasoning behind the windfall allowance that is proposed.</p> <p>The policy as it currently reads does not prevent redevelopment of dwellings and the policy for building sustainable homes and businesses (DM4) would apply to any redevelopment proposal as development plan policies need to be read together. No change is therefore proposed.</p>
Peter Norman (lpr1030)	<p>SP12 this entire section needs to be re-written in light of a review of the 2005 exercise as to how best to meet the districts housing requirements as the current housing delivery plan is based on outdated assumptions.</p> <p>Changes seeking: To review how we meet housing requirements in light of the environmental challenges and the changes to work/leisure balances brought about by Covid 19</p>	<p>It is presumed that the respondent is referring to the consultation on Options which was carried out in October 2005 as part of the preparation of the first Core Strategy, submitted in 2006 and then withdrawn. Since then the strategy has been reviewed through the subsequent Core Strategy, which was found sound at Examination and adopted in 2012.</p>

Respondent (with lpr ref)	Response	Council Response
		The preparation of the evidence base for the LPR was largely undertaken prior to the COVID 19 pandemic, the impact of which will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.
Colin Duff (lpr456)	<p>Beg to point out a typographical error in 6.13</p> <p>"This includes the strategic allocation at North West Thatcham for up to 2,500 homes where delivery of at least 1,250 dwellings is anticipated within the plan period."</p> <p>Should this refer to North East Thatcham?</p>	Comments noted. The typo will be corrected.
Susan Millington (lpr462)	I believe the contribution that windfall sites is underestimated, there should be a push for mixed development in the industrial areas around Thatcham station, and the proposed developments at Sandleford and NE Thatcham should be scaled back substantially or removed entirely.	<p>The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. The Plan does, though, support development of previously developed sites within the settlement boundaries and any large and medium sites that do come forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met. The Council needs to be able to demonstrate that the housing requirement can be met in a plan-led fashion rather than relying on brownfield land to come forward at the appropriate time.</p> <p>The industrial areas at Thatcham are proposed to be retained as designated employment areas. The plan must demonstrate that there is sufficient employment land to meet the economic needs of the District.</p>
Piers Allison (lpr489)	<b>The number of houses required in the overall plan</b>	The assessment of local housing need (LHN) using the government's standard method takes no account of land constraints or supply. It is purely based on the 2014-based household projections with an uplift to reflect affordability

Respondent (with lpr ref)	Response	Council Response
	<p>In the supporting text to Policy SP12, you explain the calculation basis from the NPPF that was defined and published in February 2019 (<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf</a>). However that calculation was established before the AWE REPIIR and the new DEPZ was set on 22 May 2019 (<a href="https://info.westberks.gov.uk/awe">https://info.westberks.gov.uk/awe</a>). Thus the 'housing demand number' set by the Government formula was determined before the area available for new housing in West Berkshire was shrunk by the enlarged safety zones around Aldermaston and Burghfield.</p> <p>The area of West Berkshire outside of the AONB is approx 182 km2. The areas of the two DEPZs within West Berkshire are approx 21 km2 (for Aldermaston) and 33 km2 (for Burghfield) = 54 km2 in total (using the smaller 'jagged edge DEPZ' rather than the larger OCZ 8km buffers).</p> <p>Thus the enlargement of the DEPZs has reduced the available West Berkshire non-AONB area by <math>54/182\% = 30\%</math>.</p> <p>West Berkshire Council should make representations to Government to argue for a reduced number of houses as a result of the DEPZ regulations coming in after the original demand calculations were made. The new provision should be for 6188-6842 (a reduction of 2652-2932 houses). In Policy SP4, West Berkshire is following the ONR's recommendation against development of 200 dwellings or greater from the larger Outer zone. If the reduction in available area due to that larger zone was to be considered, the number of houses in WBC's new provision should be even smaller.</p>	<p>issues. The Council made representations when consultation was undertaken on proposed changes to the methodology.</p> <p>The housing requirement figure needs to show the extent to which the identified LHN, calculated using the government's standard method, can be met over the plan period. The HELAA assesses land availability and there is no evidence to show that the minimum housing need cannot be met in the district.</p>
Cllr Alan Macro (lpr757)	<p>Sites for far too many homes are proposed to be allocated.</p> <p>There is far too little allowance being made for windfall sites because only sites of under 10 units are being counted.</p>	<p>See response to Cllr Tony Vickers above (lpr538)</p> <p>Comments regarding RSA16 and 17 noted and considered under Policy SP14</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Section 6.12 under “Future Supply” says sites for a further 1,661 dwellings need to be found, however the new sites proposed to be allocated would total 2039 homes, an excess of 378</p> <p>ALL windfall sites should be included with the handful of large sites allocated elsewhere in the plan being subtracted (to avoid “double-counting”). An allowance for homes converted from offices, etc. using permitted development rights should be included.</p> <p>Sites RSA16 and RSA17 should be removed from the plan.</p>	
<b>Landowners, site promoters and developers</b>		
Barton Willmore for Donfield Homes (lpr2098)	<p><i>See attachments for full response.</i></p> <p>We <u>do not agree</u> with the proposed policy on the basis that the housing target is insufficient.</p> <p>The Council’s target figure does not incorporate sufficient uplift to meet the “substantial” affordable housing need of 319 dwellings per annum identified within the West Berkshire District Updated Housing Needs Evidence, May 2020 (Paragraph 9.7, page 80). Whilst it is acknowledged that the Council are not required to meet this need in full, the PPG states that “an increase in total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes” (Reference ID: 2a-024-20190220). The Council should uplift their housing target through the allocation of additional sites in order to deliver additional affordable homes. Failure to do so will result in an increased year-on-year deficit in terms of the number of affordable homes provided across the district over the plan period.</p> <p>In addition to the affordable housing need, West Berkshire should also be increasing their housing target in order to seek to meet a proportion of</p>	<p>The housing requirement seeks to ensure that, at a minimum, the LHN can be met. While greenfield allocations are a major source of affordable housing and the Council is justified in seeking to maximise the provision of affordable housing on eligible development sites, the inter-relationship between the affordable housing need and overall housing need is important. The LHN takes account of both net household growth and an upward adjustment to improve affordability. This upward adjustment will in itself increase the delivery of market and affordable housing. The affordable need is in comparison a gross figure which includes existing households who require a different size or tenure of home. In moving to a new home, these households would release existing properties for other households.</p> <p>The affordable needs modelling is very sensitive to the housing costs and earnings at the time of the assessment. Theoretically, the delivery of housing in line with the standard method should over time improve the affordability</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Reading Borough Council's unmet housing need. Against the standard method minimum, Reading's unmet need equates to over 4,000 dwellings over the recently adopted Reading Local Plan period. Reading is a highly constrained local authority and, given that the Eastern Urban Area of West Berks is contiguous with the west of Reading, West Berkshire should seek to meet some of this need. In particular, opportunities to accommodate development within settlements to the east of West Berks including those within the AONB should be explored. Our client's site at Lower Basildon (reference BAS1 within the West Berkshire Housing and Economic Land Availability Assessment ('HELAA') (February 2020)) would represent a site which, together with others, would contribute to meeting Reading's unmet need.</p> <p>The Council should increase their housing target and allocate further sites for development.</p>	<p>of market housing and thus, over time, reduce the scale of affordable housing need.</p> <p>There are also other means of delivering affordable homes, including use of public sector land and, where appropriate, through First Homes and rural exception sites.</p> <p>The Updated Housing Needs Evidence (July 2022) concludes that the affordable housing evidence does not per se specifically justify a higher housing requirement above the standard method.</p> <p>Please see response to Reading Borough Council (lpr1488) regarding unmet housing need.</p> <p>The site at Lower Basildon that is being promoted has been assessed through the site selection process. See response to lpr2099 on SP15.</p>
Prosper Infinity Ltd (lpr178)	<ol style="list-style-type: none"> <li>1. Avoid using greenbelt or undeveloped land where possible.</li> <li>2. Suggesting a redevelopment site in Thatcham that is brownfield i.e. developed upon and entirely hardstanding and demonstrates it is in a sustainable location.</li> </ol>	<p>The plan does aim to focus development within existing settlements and predominantly on brownfield land. The site at Newbury Leisure Park will be considered through the site selection process.</p>
Fisher German LLP for Mr Musgrave and Mr Begley (lpr1229)	<p>We support the Council's aim to try and deliver housing levels (9,775 dwellings) in excess of base Local Housing Need (8,840 dwellings). This approach is robust and in accordance with the NPPF in respect of seeking to boost significantly the supply of housing. This approach also helps protect the authority against non-delivery, ensuring a robust five year housing land supply and also ensuring the Housing Delivery Test is satisfied. We also support the commitment that any target in the Plan does not represent a</p>	<p>Support for approach on overall requirement noted.</p> <p>The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. It is based on the rate of small site windfall delivery (excluding permitted development) over the plan period (2006 -2022).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>ceiling and cannot be used to restrict legitimate housing from coming forward.</p> <p>It is however imperative that the Council can demonstrate clearly that the Plan will contain sufficient sites, including sufficient lead in times, to deliver a robust five-year housing land supply at time of adoption and also the overall quantum of housing required over the entire Plan period.</p> <p>Concern is raised in that the Council's assumptions for windfall development, and that past trends of windfall delivery can accurately predict future supply, where every windfall development removes a potentially suitable site from future supply. It does not stand to reason that within the settlement boundaries which are not extended, with only a finite selection of sites, the number of windfalls will remain consistent, unless there is clear and compelling evidence that there remains enough suitable land available for such delivery.</p> <p>Whilst we would of course always support appropriate development within the settlement boundary, due regard must be had for the contribution green spaces and open gaps make within settlement boundaries, encouraging their development can urbanise settlement centres, having a damaging impact on their form and character. We do not consider the Council's approach to windfall development is sound, and we do not consider the methodology used is justified in light of the above, nor is likely to be effective. The expected rate of windfall delivery should be reduced on the above basis.</p> <p>Further concern is raised at the lack of a published trajectory to support the plan. Without this information there can be no clarity as to whether the Council will be able to demonstrate a five year housing land supply, or even deliver the quantum of housing required over the entire Plan period, through the delivery of this draft Plan. In particular, a trajectory is required to show how the Council expects its allocations to be delivered, including assumed</p>	<p>Though windfall delivery varies from year to year and the allowance is not intended to accurately predict future supply, it is apparent from the monitoring of permissions and completions that is a consistent source of supply and there is no indication of this supply falling away. Table A.9 of the 2020/2021 Annual Monitoring Report (AMR) shows completions on allocated and non-allocated sites since April 2000. There is no year in that period when windfall delivery has fallen below 140 units. Delivery will continue to be monitored through the AMR to ensure that assumptions remain robust.</p> <p>The Council seeks to focus development in the more sustainable settlements but development control policies will ensure that regard is given to green spaces and to urban form and character in determining applications.</p> <p>A trajectory will be prepared to accompany the next stage of consultation. The trajectory and Five Year Land Supply will be monitored annually.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>lead in times and annual rates of delivery. If there are issues with the Council's approach which only become apparent through Regulation 19, the only recourse will be main modifications at Examination, this is not in the interests of good plan making where such matters should be explored fully at Regulation 18, to ensure any Plan submitted is sound.</p> <p><b>Changes sought</b></p> <p>Amend the windfalls rates to a more appropriate rate, as discussed above.</p> <p>Publish a housing trajectory to support the Plan.</p>	
Solve Planning for Emily West (lpr1424)	<p>The policy seeks to delivery sufficient housing within the Borough. The policy needs to be build in some flexibility to take account of changes to the Borough's housing requirement. However, the policy states that the identified housing figure is a starting point and does not "constitute a ceiling or cap to development".</p> <p>A flexibility around the identified housing figure needs to be retained.</p>	Comments noted. It is considered that retaining the requirement as a range does introduce some flexibility.
Southern Planning Practice Ltd for the Saunders Family (lpr2119 and lpr1927)	<p>Paragraph 11 of the National Planning Policy Framework 2019 states that Local Plans should positively seek opportunities to meet the development needs of their area - as a minimum – but also be sufficiently flexible to adapt to rapid change as well as any needs that cannot be met within neighbouring areas. This stance is also reiterated in the Planning Policy Guidance. Policy SP12 sets out that provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. It goes on to confirm that the figure of 575 dwellings per annum does not constitute a ceiling or cap to development. We are supportive of this approach, however, we believe the policy should be worded to set out that the objectively assessed housing</p>	<p>Support for approach noted. The supporting text does state that SP12 indicates the housing requirements as a range, with a minimum requirement of 513 dwellings per annum meeting the 2022 LHN.</p> <p>Please see response to Reading Borough Council (lpr1488) regarding unmet need in the wider area.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>should be a <b>minimum</b> (our emphasis) figure in accordance with paragraph 11 b) of the National Planning Policy Framework.</p> <p>In addition to West Berkshire’s Housing need, the Local Plan Review should look to firstly be flexible to adapt to rapid change and secondly help to meet unmet need arising from neighbouring areas. West Berkshire falls within the Thames Valley area and therefore should look to help accommodate any unmet need which is arising in this area.</p> <p>The governments standard method for calculating objectively assessed housing needs was first consulted on in 2017 and adopted in 2018. This standard method intended to shift the focus away from the ‘numbers’ question and towards the how and where of building new homes. Subsequently in August 2020 the government consulted on a proposed new standard method which had a greater focus on affordability. However, this new standard was met with much criticism which resulted in the Government withdrawing the proposed standard method in December 2020 and reverting back to the method introduced in 2018 with the addition of a 35% ‘top up’ to the 20 largest cities and urban areas.</p> <p>Under the August 2020 proposed standard method, West Berkshire’s housing need increased from 513 (calculated under the original 2018 standard method) to 692. It has now been reduced to the original figure of 513 homes per annum. Whilst the housing need for West Berkshire has not changed, the housing need for Reading Borough Council has significantly increased. The 2018 standard method set out an objectively assessed need of 649 whilst the latest December 2020 method has increased this to 876 dwellings per annum. This figure results in an additional 227 dwellings per annum. Therefore, in accordance with paragraph 11 and the duty to cooperate, West Berkshire and other local planning authorities within the Thames Valley area should look to help accommodate some of Reading Borough’s needs.</p>	

Respondent (with lpr ref)	Response	Council Response
Pro Vision for Rivar Ltd (lpr1512 and lpr1635)	<p>The Council needs to ensure that there is sufficient flexibility in the Local Plan with regards to the overall housing strategy.</p> <p>The National Planning Policy Framework ('the Framework') acknowledges at paragraph 68 that small and medium sized sites '<i>can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly</i>'. Accordingly, the Local Plan should identify a range of sites of various sizes – from small scale to large scale developments - to provide extra resilience and flexibility to the Local Plan.</p> <p>With this in mind, we welcome the proposed allocation of the 'Land north of Southend Road, Bradfield Southend' (lpr1512) for a small/medium scale development which will provide choice and contingency to the market. As suggested in the Policy, the site capacity will be subject to further assessment.</p> <p>With this in mind, we welcome the proposed allocation of our client's land for a small-scale development of around 10 dwellings at Newbury (lpr1635) which will provide choice and contingency to the market.</p>	Support for approach noted. The sites promoted are considered in the responses to comments on RSA5 and RSA25.
Pro Vision for Trustees of Allan Snook Will Trust (lpr1917)	<p><i>Full representation on behalf of the Trustees of the Allan Snook Will Trust promoting land to the south of the Recreation Ground, Boxford is attached.</i></p> <p><b>Housing Requirement</b></p> <p>The Government's standard housing method results in a minimum requirement of c. 513 dwellings per annum (dpa) in West Berkshire. The Consultation Document refers to a range of 8,840 to 9,775 net additional homes in West Berkshire up to 31 March 2037. This equates to between 520 to 575 dpa. The target of 575 dpa is a c.10% uplift on the local housing need, as calculated using the standard method.</p>	<p><b>Housing Requirement</b></p> <p>The housing requirement aims to ensure that the LHN is met at a minimum and thus boost the supply of housing. The housing requirement issues relating to affordable housing and un-met need from other authorities are covered in the responses to Barton Willmore for Donfield Homes (lpr2098) and Reading Borough Council (lpr1488). The Council does not consider the requirement for the LPR should be increased although the plan will be subject to periodic review.</p> <p><b>Housing Supply</b></p>

Respondent (with lpr ref)	Response	Council Response
	<p>However, it is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> <li>insufficient to support the Government’s objective of significantly boosting the supply of housing;</li> <li>significantly below the Council’s aspirations to achieve and address the affordability problem within West Berkshire; and</li> <li>does not take account of potential un-met need from neighbouring authorities (particularly from Reading) given the recent changes in local housing needs.</li> </ul> <p>With the above in mind, it is considered that West Berkshire’s housing requirements should be increased. In this respect, the Council should deliver this additional housing proportionately across the district, including identifying any reasonable scale opportunities at the ‘smaller villages’ with a defined settlement boundary, such as Boxford.</p> <p><b>Housing Supply</b></p> <ul style="list-style-type: none"> <li>need to apply a 10% non-implementation rate to the ‘committed’ housing supply where appropriate.</li> <li>the over-reliance on windfall provision, which by its nature is uncertain;</li> <li>the need to review the deliverability of Sandford Park as a strategic allocation given recent planning refusals and lack of evidence to address technical concerns;</li> <li>the need to undertake further evidence to demonstrate the deliverability and viability of NE Thatcham; and</li> <li>the unrealistic housing provision/trajectory during the plan period for the strategic allocations at both Sandford Park and NE Thatcham.</li> </ul>	<ul style="list-style-type: none"> <li>There is no evidence for a 10% non-implementation rate to the committed supply. The Council has introduced flexibility by proposing a range with a target some 5% above the LHN.</li> <li>The windfall allowance is considered modest in relation to past delivery. See response to Barton Willmore for Donfield Homes (lpr2098).</li> <li>The Council remains committed to the delivery of Sandford Park as the most appropriate location in Newbury for significant residential development. Outline planning permission was granted for the eastern part of the site in May 2022, and there is a planning application for the western part of the site pending determination.</li> <li>The Thatcham Strategic Growth Study has considered viability and further whole plan viability work has been undertaken and will be published with the Reg 19 consultation.</li> <li>The emerging plan assumes delivery of 1,500 units at Sandford Park and 1,500 at North East Thatcham by 2039. This is not considered unrealistic. Reference to the Lichfield’s research report has been made, and also the site deliverability forms submitted by the promoters and more importantly the progress being made on the applications which determines whether the site meets ‘deliverable’ definition in the NPPF. Progress will be continually monitored and adjustments made to the trajectory.</li> </ul> <p>Opportunities for limited development in the smaller villages of the District may arise through the review of settlement boundaries.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It is considered that the Council needs to identify further development to reduce this potential housing shortfall and provide extra resilience and flexibility to the Local Plan in the event that the anticipated provision does not deliver. Accordingly, sites in the ‘smaller villages’ with a defined settlement boundary – such as Boxford – could help the Council meet any identified housing shortfall.</p>	
<p>Turley Associates for A2dominion Housing Group (lpr1497)</p>	<p><i>Full representations made by Turley on behalf of A2Dominion in relation to Land East of Reading Road, Streatley are attached.</i></p> <p>Emerging Policy SP12 (Approach to Housing Delivery) identifies the Councils plans to provide ‘8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.’</p> <p>A2Dominion note that the historically low levels of housing delivery within Streatley has resulted in a significant restriction in the availability of affordable housing within the village. Subsequently, this has prevented the presence of younger residents settling into the village to contribute towards maintaining the vitality and vibrancy of the settlement.</p> <p>The NPPF states ‘Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby’. (NPPF Paragraph 77 (2019))</p>	<p>The proposed approach is to continue to focus development in the more sustainable settlements of the District as outlined in Policy SP3 Settlement Hierarchy. See response to this consultee’s representations lpr1496 on Policy SP3 and lpr1494 on SP15.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The emerging direction of housing delivery for Streatley would limit the opportunity for development and fail to address opportunity for the village to 'grow and thrive'.</p>	
<p>Pro Vision for Newbury Racecourse (lpr1681)</p>	<p><i>Full representations on behalf of Newbury Racecourse attached</i></p> <p><b>Context</b></p> <p>The Framework requires that the minimum number of homes needed should be determined by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (paragraph 60).</p> <p>It is noted that the Berkshire (including South Bucks) Strategic Housing Market Area (SHMA) study (dated, February 2016) indicates a need for an average of 665 dwellings per annum (dpa) for the period 2013 – 2036 across West Berkshire. This included key uplifts to support economic growth and to improve overall affordability.</p> <p>The Council's Regulation 18 Local Plan Review consultation in November 2018 refers to the standard method with respect to both the 2014 and 2016 based household projections. The minimum housing requirement was 635 and 551 dpa, respectively.</p> <p>In Summer 2020, the Government consulted on a proposed new standard method which placed a greater emphasis on addressing affordability. This standard method would result in a minimum requirement of 692 dpa for West Berkshire. However, due to political and mediapressure this proposed</p>	<p><b>Context</b></p> <p>The LHN calculated using the standard method results in a figure (509 at March 2021) that is substantially higher than the projected growth in households (an average of 223 households per annum is projected for the period 2021 – 2031 in the latest 2018-based ONS household projections).</p> <p>Pervious assessments of need were calculated in a different manner and using evidence that is now outdated. The Council does not consider that there is justification to deviate from the standard method to derive the figure of housing need.</p> <p><u>Affordable Housing and Affordability</u></p> <p>See response to Barton Willmore for Donfield Homes (lpr2098) regarding affordable housing and affordability.</p> <p><u>Interim Sustainability Appraisal (SA)</u></p> <p>Comments on the SA are noted. It is considered that the scenarios used are appropriate in indicating the potential impacts of different levels of growth.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>method was scrapped by the Government and replaced with the 2018 method, albeit with an adjustment to top up the number in the twenty largest urban areas in England by 35% (including Reading).</p> <p>The standard method now results in a minimum requirement of c. 513 dpa in West Berkshire. The Consultation Document refers to a range of 8,840 to 9,775 net additional homes in West Berkshire up to 31 March 2037. This equates to between 520 to 575 dpa. The target of 575dpa is a c.10% uplift on the local housing need, as calculated using the standard method.</p> <p>With the above in mind, it is considered that there is justification for additional need and demand for higher housing growth in West Berkshire.</p> <p><b>Critique</b></p> <p><u>Affordable Housing &amp; Affordability</u></p> <p>The Updated Housing Needs Assessment (dated, May 2020) prepared by Icenl (on behalf of the Council) confirms that there is a “notable need for affordable housing, and it is clear that provision of affordable housing is an important and pressing issue in West Berkshire” [our emphasis]. The conclusion adds that “the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise” [our emphasis]. Further, with regards to affordability, the report confirms:</p> <ul style="list-style-type: none"> <li>• Median house prices in West Berkshire are 44% higher than the national median and 8% higher than the regional median.</li> <li>• Entry-level house prices in West Berkshire are 72% higher than the national equivalent and 11% higher than entry level prices across the South East.</li> <li>• Entry level housing is 10.4 times lower quartile earnings when compared with the national ration of 7.3 times lower quartile</li> </ul>	<p><u>Housing Delivery</u></p> <p>The Council believes a buffer of approximately 5%, expressed through the use of a range in the housing requirement is sufficient to provide flexibility to meet at least the LHN. The Council has a healthy five year supply of housing sites and the plan will be subject to continuous monitoring and 5 yearly review.</p> <p><u>Duty to Co-operate</u></p> <p>Please see response to Reading Borough Council (lpr1488) regarding unmet need in the wider area.</p> <p><b>Meeting Housing Need</b></p> <p><u>Existing Allocations</u></p> <p>The majority of allocated sites have planning permission or applications pending decision. The deliverability has also been assessed through the LPR process. It is not considered necessary to add a 10% non- implementation rate to those few sites that are yet to receive planning permission.</p> <p><u>Non-allocated Sites with planning permission</u></p> <p>Similarly for non-allocated sites it is not considered necessary to add a 10% non-implementation rate. There</p>

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	<p>earnings. Indeed, affordability ratios have risen sharply since 2013 from 7.6 to 10.4.</p> <p>The report advises that the scale of affordable housing need is c.319 dpa. This is c.55-61% of the overall housing need referred to in the Consultation Document. Accordingly, the report advises that theoretically if 35% of all new housing delivered was for affordable housing around 910 dpa would be needed to meet West Berkshire’s affordable housing need in full. Whilst it is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs), West Berkshire’s past housing delivery rates have generally been in line with the current minimum local housing need and affordability problems remain pressing.</p> <p>The report concludes that “<b><i>the Council might consider through the plan making process whether higher housing provision would have positive benefits on affordable housing delivery...</i></b>”[our emphasis]. For this reason, it is considered that there needs to be a significant increase in the need for all tenures of dwellings above the local housing need to address affordability problems in West Berkshire. This is evidenced by the Council’s housing figures in the Berkshire SHMA (c.665 dpa) and the consulted standard method that placed greater emphasis on affordability (c. 693 dpa).</p> <p>The current proposed level of housing is not aspirational and will not help the Council deliver its Local Plan ‘Vision’ for “<b><i>making available housing of different types, sizes, tenures and affordability will be a priority</i></b> in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability” [our emphasis].</p> <p><u>Interim Sustainability Appraisal (SA)</u></p> <p>The SA, at Appendix 4, assesses alternative levels of growth. This includes:</p>	<p>is no evidence to support a 10% rate and there is flexibility already built into the plan.</p> <p><u>Windfall Allowance</u></p> <p>The windfall allowance is considered modest in relation to past delivery. See response to Fisher German LLP for Mr Musgrave and Mr Begley (lpr1229)</p> <p><u>Large Strategic Sites</u></p> <p>See response to Pro Vision for Trustees of Allan Snook Will Trust (lpr1917) and Council’s response to this consultee on SP16 (lpr1683) and SP17 (lpr1687)</p>

Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>1. 'Baseline Need' (513 dpa);</li> <li>2. 'Boosting Supply' (Range 520-575 dpa); and</li> <li>3. Significantly Boosting Supply' (692 dpa).</li> </ol> <p>The SA appraisal demonstrates that significantly boosting the supply to 692 dpa has the greatest impact on meeting the affordable housing need and is scored 'significantly positive'. This option will also have significantly positive economic benefits and positive social benefits. Nonetheless, it is noted that this level of growth may have negative effects on several environmental objectives. Overall, this option is scored 'neutral', with the other two options scoring 'positively'. However, it is noted that the SA appraisal scores options ii and iii the same with regards to economic benefits (i.e. SA Objective 10), but clearly a significant increase in housing delivery more closely supports delivering this SA Objective.</p> <p>Furthermore, to assess all 'reasonable alternatives', the SA should include an assessment of the Berkshire SHMA figure and/or an appropriate 20-25% buffer to the standard method (i.e. 625 to 665 dpa). This approach would help address the Council's affordability issues and still deliver significant social and economic benefits. Furthermore, the environmental impacts would be less when compared to the higher figure of 693 dpa.</p> <p>Therefore, it is considered that the SA currently fails to provide clear and credible reasons for selecting the 520-575 dpa as its preferred approach, and which does not support the Council's 'Vision' for the Local Plan to address affordability as a priority. Accordingly, the current approach within the Consultation Document is not justified.</p> <p><u>Housing Delivery</u></p> <p>Furthermore, provision should be made within the Plan for additional development sites to provide for a higher rate between 625-665 dpa to significantly boost housing supply in accordance with the Framework (paragraph 59). As evidenced above, the provision of a 20% plus buffer to</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>the local housing need would help address affordability problems and demographic trends in line with the Council's evidence base. In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing provision does not deliver, particularly as the Council is relying on the delivery of two large strategic sites for delivering its housing need (see section 3 for further comments).</p> <p><u>Duty to Co-operate</u></p> <p>The Consultation Document advises that there has been no request to take any un-met housing need from neighbouring authorities. With regards to Reading, the document acknowledges that in 2018 there was a possibility of some un-met need from Reading Borough, but this is no longer the case.</p> <p>Further assessment is required to establish the housing requirement owing to the unmet need from the wider Housing Market Area (HMA). In particular, the revised standard method (December 2020) significantly increases housing need in Reading. Reading has seen a 35% uplift as one of the largest urban areas in England taking their housing requirement up to 876 dpa (from 689 dpa currently planned for). As such, given Reading's limited land capacity to deliver additional housing requirements, there is potential for some un-met need from Reading. In this regard, West Berkshire is well placed to meet any need from Reading.</p> <p>Furthermore, Wokingham consulted on a draft Local Plan Update in February/March 2020. The majority of the additional need for development was going to be met through the creation of a garden town at Grazeley for 10,000 new homes, with 3,750 dwellings provided during the plan period. As such, given that Wokingham need to now look at alternatives to Grazeley as it may no longer be achievable (due to the extension of the DEPZ at AWE Burghfield) there may be potential for some un-met housing need from Wokingham.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><b>Conclusion</b></p> <p>With the above in mind, it is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> <li>• insufficient to support the Government’s objective of significantly boosting the supply of housing;</li> <li>• significantly below the Council’s aspirations to achieve and address the affordability problem within West Berkshire; and</li> <li>• does not take account of potential un-met need from neighbouring authorities (particularly from Reading) given the recent changes in local housing needs.</li> </ul> <p>It is considered that West Berkshire’s housing requirements should be increased to between c.625-665 dpa. As such, provision should be made for approximately 10,625 to 11,305 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037. This level of housing will ensure delivery of the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire.</p> <p>A further increase to the housing requirement may also be required to make a significant contribution to meeting any un-met housing need from neighbouring authorities.</p> <p>With the above in mind, it is considered that there are still sufficient deliverable sites within the HELAA to deliver this additional housing proportionately across the district in line with the settlement hierarchy, including at ‘land south of Newbury Racecourse’.</p> <p><b>Meeting Housing Need</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><b>Context</b></p> <p>The Consultation Document identifies several sources of housing supply across the plan period. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.</p> <p>Table 2: Housing Supply at March 2020 of the Consultation Document confirms that 4,653 dwellings have planning permission, 1,482 dwellings are allocated without permission (with a 1,000 dwellings from Sandford Park and 482 dwellings carried forward from the HSA DPD); and a windfall allowance of 1,979 dwellings. This amounts to 8,114 dwellings – and therefore to meet the proposed requirement of 575 dpa there is a need to find a further 1,661 dwellings during the plan period.</p> <p>The Consultation Document includes the delivery of two strategic urban extensions: Sandford Park (1,500 dwellings) and North-East Thatcham (2,500 dwellings). The Council assumes that 1,250 dwellings are deliverable at NE Thatcham within the plan period.</p> <p>It is proposed that a further 315 dwellings will be allocated via Neighbourhood Plans and 490 dwellings on newly allocated sites.</p> <p><b>Critique</b></p> <p><u>Existing Allocations</u></p> <p>The Council's Site Selection Background Paper (December 2020) provides an update on the deliverability of sites that have already been allocated in the Core Strategy or HSA DPD, but not substantially completed.</p> <p>The history of some of these sites identified in the supply that do not currently have planning permission or where a site's delivery has been</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate applied to this supply would provide a more robust position.</p> <p><u>Non-allocated Sites with planning permission</u></p> <p>Similarly, Table 2 shows that nearly 2,954 dwellings is provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate should be applied to this figure to provide a more robust position as it is unlikely that all these permissions will be delivered.</p> <p><u>Windfall Allowance</u></p> <p>The Consultation Document includes a windfall allowance of 1,979 dwellings up to 2037. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) over the existing plan period 2006 – 2020.</p> <p>However, it is recommended that the Council remove or significantly reduce this windfall allowance to provide greater surety of supply through allocations and without having to rely on the use of a windfall allowance which by its nature is uncertain. In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings will not deliver any affordable housing and further exacerbate affordable housing need within West Berkshire.</p> <p><u>Large Strategic Sites</u></p> <p>It is anticipated that Sandleford Park and North East Thatcham will provide 1,000 and 1,250 dwellings up to 2037, respectively. The Council therefore</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>rely greatly on the delivery of these two large strategic sites to deliver the housing need over the plan period.</p> <p><i>Sandleford Park</i></p> <p>The Council's Site Selection Background Paper (December 2020) and 'Deliverability Update' does not refer to the latest refusal at Sandleford Park regarding planning application ref:20/01238/OUTMAJ for up to 1,000 new homes in October 2020. This follows several previous refusals since 2017. A current application is still being considered on part of the site for around 500 new homes.</p> <p>With the above in mind, the deliverability of a strategic level of development (i.e. 1,500 new homes) at Sandleford Park is questioned. There appear to still be numerous issues that have not been resolved despite the first planning application for the site being submitted in 2015.</p> <p>The latest planning application was refused for some 14 reasons, including [inter alia]: failing to ensure the holistic comprehensive development of the Sandleford Strategic Site Allocation; impact on the environment, protected sites, trees and several ancient woodlands; impact on the local highway network (including the A34); and failure to secure necessary infrastructure improvements via a S106 Agreement.</p> <p>The Site is not re-assessed in the Site Assessment Site Selection Background Paper (December 2020) because the Council contend that the principle has already been accepted through the adoption of the Core Strategy. However, this approach is flawed as clearly issues have developed that the Inspector at the time would not have known. Without further evidence that these issues affecting deliverability can be resolved, the inclusion of Sandleford Park within the Local Plan Review is unsound.</p> <p>If additional technical evidence can demonstrate that the site is still deliverable, there are concerns regarding the expected delivery of 1,000</p>	

Respondent (with lpr ref)	Response	Council Response
	<p> dwellings across the Plan Period. It is noted that the Council, at this stage, has not provided the expected rate of housing delivery over the plan period through a housing trajectory. Nevertheless, the Council do not include Sandleford Park within the Council's five-year housing land supply - and therefore first completions are not expected before the end of the current plan period (i.e. up to 2026). This is also the approach taken in the Council's Annual Monitoring Report (January 2021) which confirms that timing of delivery of Sandleford Park is "<i>likely to be largely in the period post 2026</i>" and Phase 1 Local Plan Review Transport Assessment (December 2020).</p> <p>Evidence suggests that for sites of around 1,500 dwellings, a realistic average annual build out rate is between 100 dpa to 120 dpa (Source: Lichfield's Start to Finish (2nd Edition) – How Quickly to Large-Scale Housing Sites Deliver, February 2020). As such, to deliver 1,000 dwellings across the plan period, first completions would be needed from 2026/2027.</p> <p>As such, given that an outline application has recently been refused it seems unrealistic – particularly given the site's history - that first completions will deliver within these timescales. Indeed, evidence demonstrates that for schemes of around 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), February 2020) and, therefore, timescales may already have been missed to fully deliver the expected provision during the plan period.</p> <p>With this in mind, due to uncertainty over the delivery of the proposal it is recommended that Sandleford Park is removed from the Plan or the scale of housing provision over the plan period reduced.</p> <p><u>North East Thatcham</u></p> <p>NE Thatcham, on the face of it, provides an easy solution for the Council to increase housing numbers to meet the overall requirement, but further</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>information is required to demonstrate the deliverability and viability of the site for 2,500 dwellings. In particular, there are concerns that:</p> <ul style="list-style-type: none"> <li>• there is a need for further detailed technical evidence (transport, drainage, landscape, heritage, ecology etc.) to demonstrate the deliverability and capacity of the site;</li> <li>• the location of the site close to the North Wessex AONB may significantly reduce density of the site (particularly towards the edge) and, therefore, the delivery of 2,500 dwellings requires further assessment as more detailed evidence is prepared;</li> <li>• construction mineral deposits need to be investigated thoroughly to ensure development does not sterilise a workable resource. Indeed, prior extraction should occur where practicable;</li> <li>• there appears to be no assessment of the impact of much of the site being located within the Outer Consultation Zone (OCZ) for AWE Aldermaston; and</li> <li>• the proposals must be strongly grounded in viability to ensure that key infrastructure can be delivered alongside housing to deliver the objectives of the scheme and wider benefits to Thatcham.</li> </ul> <p>With regards to the build out rate the Thatcham Strategic Growth Study Stage 3 Report: Thatcham Future (September 2020), at Appendix B, assumes a total period of 17 years from first completions. For most of the build-out period, an average of 160 dwellings per year has been applied (apart from the first year of 50 dwellings).</p> <p>The market evidence demonstrates that for schemes of 2,000+ dwellings, the lead-in time from validation of an application through to first completions is approximately 8.4 years (Source: Lichfield's Start to Finish (2nd Edition), February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2022 in the LDS) and taking the view that the planning application for the site is submitted by the end of 2023/2024, first completions cannot be projected before 2032/2033. Further, this timescale may be optimistic if prior</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>mineral extraction is required and there are delays to the adoption of the Plan.</p> <p>With the above in mind, it is considered that the Council should take a cautious approach with the site identified as potentially delivering housing supply towards the latter end of the plan period. As such, the scale of development proposed in the plan period should be significantly reduced. Delivering completions in the last five years of the Plan would equate to around 690 dwellings (significantly less than 1,250 dwellings suggested) based on the build out rates in the Growth Study which are supported by market evidence.</p> <p><b>Conclusion</b></p> <p>With the above in mind, it is considered that the Council’s housing supply will lead to a significant housing shortfall across the plan period due to:</p> <ul style="list-style-type: none"> <li>• need to apply a 10% non-implementation rate on the ‘committed’ housing supply where appropriate.</li> <li>• the over-reliance on windfall provision, which by its nature is uncertain;</li> <li>• the need to review the deliverability of Sandford Park as a strategic allocation given recent planning refusals and lack of evidence to address technical concerns;</li> <li>• the need to undertake further evidence to demonstrate the deliverability and viability of NE Thatcham; and</li> <li>• the unrealistic housing provision/trajectory during the plan period for the strategic allocations at both Sandford Park and NE Thatcham.</li> </ul> <p>It is considered that the Council needs to identify further development sites spread proportionately across the district in line with the settlement hierarchy to reduce this potential housing shortfall and provide extra resilience and flexibility to the Local Plan in the event that the anticipated provision does</p>	



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	not deliver. In this respect, our client's 'land south of Newbury Racecourse' should be considered for allocation in the Local Plan.	
Pro Vision for Mr and Mrs Pittard (lpr1959)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached as a response to Policy SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham.</i></p> <p>Policy SP12 sets out that “Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520-575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.”</p> <p>Supporting text (paragraph 6.2) sets out that the Local Housing Need (LHN) for the District is 513 dwellings per annum (dpa). This accords with the Indicative LHN calculated based on the Government's revised Standard Method, which was published on 16 December 2020 (2).</p> <p>In reviewing the figures quoted above, the Council is planning to deliver 7-62 dpa above its LHN, which equates to an additional 119-1,054 dwellings over the 17-year plan period.</p> <p>The lower end of the Council's proposed housing target (520 dpa) is based on the 2019 LHN, while the upper end (575 dpa) represents a 12% uplift on the 2020 LHN (513 dpa). No justification is provided in the draft Plan – or its evidence base – for the proposed 12% uplift or why it is considered appropriate compared with a higher uplift.</p> <p>Paragraph 6.5 explains that “The allocation of sites in this DPD aims to meet delivery of a higher number of homes in order to both boost supply and have</p>	<p>The housing requirement is expressed as a range in order to increase the target housing requirement above the LHN and therefore boost housing supply. An uplift of approximately 10% is considered appropriate to allow flexibility in the supply.</p> <p>Pro Vision have set out how the assessment of housing need has changed over the past few years. Since the government introduced the standard method the LHN for West Berkshire has inevitably fluctuated as it is re-calculated each year, looking at a rolling ten year period for the household projections and using the latest published affordability ratios. West Berkshire has seen a consistent slight fall each year in the LHN with that for 2021 calculated as 509 dwellings per annum. The so called “mutant algorithm” was consulted on by the government but was not introduced and the figure of 692 dpa was therefore never West Berkshire's LHN.</p> <p>See response to Barton Willmore for Donfield Homes (lpr2098) regarding consideration of affordability issues and the assessment of need.</p> <p>Comments on the SA are noted. It is considered that the scenarios used are appropriate in indicating the potential impacts of different levels of growth.</p> <p>Please see response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty</p>

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	<p><i>some built-in flexibility. The upper end of the range is a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable.</i></p> <p>The aim to boost supply complies with paragraph 59 of the NPPF. Furthermore, built-in flexibility ensures that the Local Plan is sufficiently flexible to adapt to rapid change (paragraph 11(a) of the NPPF). However, to ensure that decisions regarding new development can remain Plan-led (paragraph 15) and land is brought forward at a sufficient rate (paragraph 23), it is necessary to ensure that there is enough flexibility in the Plan. Such a contingency is particularly important as the Council is relying upon two complex, large sites (Sandleford Park and North East Thatcham) to deliver a large proportion of the District’s housing need.</p> <p>Paragraph 6.5 correctly identifies that the upper end of the range (575 dpa) should not be considered a maximum amount and is not a cap on development that would otherwise be acceptable. This is confirmed by the PPG (3), which explains that <i>“the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area”</i> and that <i>“there will be circumstances where it is appropriate to consider <b>whether actual housing need is higher than the standard method indicates</b> (our emphasis).”</i></p> <p>The PPG (4) goes on to explain that:</p> <p><b>“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</b></p> <ul style="list-style-type: none"> <li>• <i>growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</i></li> <li>• <i>strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or</i></li> </ul>	<p>to Co-operate statement will be published alongside the Reg. 19 consultation.</p> <p>The Council has considered the allocation of reserve sites but has concluded that this would lead to some uncertainty and difficulty in managing the phasing of site delivery. The plan will be reviewed on a 5 year cycle and annual monitoring will indicate if changes are required.</p> <p><b>Housing Supply and Delivery</b></p> <p>The current Local Plan allocations were always intended to deliver towards the end of the plan period, with the strategic allocation at Sandleford Park originally phased for the latter half of the plan period. The HSA DPD was only adopted in 2017 and the vast majority of sites now have planning permission and delivery on those with permission is increasing, broadly in line with expectations.</p> <p>Regarding the contribution from windfall development, this does not suggest that a high proportion of planning decisions in West Berkshire have not been plan-led, conflicting with paragraph 15 of the NPPF. The Local Plan directs development to the more sustainable settlements and establishes the principle in favour of development within settlement boundaries. Though such sites are classified as windfall in that they are not <i>“specifically identified in the development plan”</i> (NPPF definition of windfall) planning decisions on non-allocated sites are definitely plan-led and determined in accordance with the development plan. Table 3.16 of the 2021 AMR shows that the vast majority of completions are within settlement boundaries to which development is directed. Additionally para 69 of the 2021 NPPF states that local planning</p>

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	<ul style="list-style-type: none"> <li>• <b>an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;</b></li> </ul> <p><b><i>There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method (our emphasis)."</i></b></p> <p>It is therefore necessary to consider whether the amount of housing that the Council is planning to deliver is appropriate.</p> <p>In the first instance, as there has been a great deal of change recently regarding how housing need should be calculated, it is helpful to understand the housing numbers related to West Berkshire in recent years. In summary:</p> <ul style="list-style-type: none"> <li>• The adopted West Berkshire Core Strategy (July 2012) planned for <b>525 dpa</b> over the period 2006-2026.</li> <li>• The Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) (February 2016) concluded that the Objectively Assessed Housing Need (OAN) for West Berkshire across the period 2013-2036 was <b>665 dpa</b>.</li> <li>• In September 2017(5) the Government published a consultation on the new Standard Method for calculating the LHN. This resulted in a minimum LHN for West Berkshire of <b>513 dpa</b>.</li> <li>• The OAN Sensitivity Testing carried out in the Western Berkshire Housing Market Area (March 2018), which considered the findings of the 2016 SHMA against more recent data, concluded that the OAN for West Berkshire was <b>600 dpa</b>.</li> <li>• The Council's Regulation 18 Local Plan Review consultation (November 2018) referred to a minimum LHN based on the 2016-based household projections of <b>631 dpa</b>, as well as a minimum LHN</li> </ul>	<p>authorities should 'support the development of windfall sites through their policies and decisions- giving great weight to the benefits of using suitable sites within existing settlements for homes'</p> <p>The windfall allowance is considered modest in relation to past delivery. See response to Fisher German LLP for Mr Musgrave and Mr Begley (lpr1229).</p> <p>A housing trajectory will be published and will be updated annually in the AMR.</p>

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	<p>based on the 2014-based household projections of <b>551 dpa</b> over the period 2018-2036.</p> <ul style="list-style-type: none"> <li>• In August 2020(6) the Government consulted on a revised Standard Method (colloquially known as the “mutant algorithm”) as part of its “<i>Changes to the current planning system</i>” consultation. This resulted in a minimum LHN of <b>692 dpa</b>.</li> <li>• In December 2020(7) the Government published its response to the LHN proposals in the “<i>Changes to the current planning system</i>” consultation. The Indicative LHN outlined for West Berkshire reverted back to the figure from 2017, with a minimum requirement of <b>513 dpa</b>.</li> <li>• The current draft Local Plan (December 2020) refers to a range of between <b>520-575 dpa</b>.</li> </ul> <p>Considering the above, it is clear that in recent years, the Council’s housing need has ranged considerably from 513 dpa (current LHN) to 692 dpa (“mutant algorithm”).</p> <p>Page 43 of the Council’s Updated Housing Needs Evidence (May 2020) explains that there is “a <i>notable need for affordable housing</i>” and that “<i>it is clear that provision of new affordable housing is an important and pressing issue in West Berkshire.</i>” It goes on to explain that the evidence suggests “<i>that affordable housing delivery should be maximised where opportunities arise.</i>”</p> <p>Paragraph 9.2 confirms that there are notable affordability issues in West Berkshire. Table 9.1 advises that there is an estimated affordable housing need in West Berkshire of 319 dpa over the period 2018-36, although this reduces to 272 dpa if affordable housing in the development pipeline (with planning permission) is included in the calculation of need.</p> <p>Paragraph 9.7 sets out that the scale of affordable housing need is substantial. This is underlined by paragraph 9.8, which explains that “<i>if notionally 35% of new housing delivered was of affordable housing around</i></p>	

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	<p>910 dwellings per annum would be needed to meet the affordable housing need in full.” While the Standard Method takes account of affordability and therefore, as paragraph 9.10 explains, over time the affordability of market housing should improve and the scale of affordable housing need should reduce, there is a pressing need for affordable housing now, as there has been for a number of years.</p> <p>Paragraph 9.12 concludes by setting out that, for the reasons outlined in the Report, “the Council might consider through the plan-making process whether higher housing provision would have positive benefits on affordable housing delivery.” Furthermore, paragraph 9.13 explains that “The evidence clearly suggests that affordable housing delivery should be maximised where opportunities arise.” This would accord with paragraph 3.2 of the draft Local Plan, which explains that “Making available housing of different types, sizes, tenures and affordability will be a priority.”</p> <p>Appendix 4 of the Council’s Interim Sustainability Appraisal (SA) Report (December 2020) provides a SA of each of the policies in the draft Local Plan. In relation to policy SP12, the following alternative levels of housing growth (reasonable alternatives) in the District were assessed:</p> <ul style="list-style-type: none"> <li>• Option 1: Baseline need – 2020 LHN of 513 dpa.</li> <li>• Option 2: Boosting supply – Range of 520-575 dpa.</li> <li>• Option 3: Significantly boosting supply – “Mutant algorithm” LHN of 692 dpa.</li> </ul> <p>The SA assesses each option against the same ten sustainability objectives, followed by a commentary regarding the effect of each option, an overall summary and conclusion, including setting out the preferred option, and details of potential avoidance measures, mitigation, offsetting and enhancements.</p> <p>It is concluded that Options 1 (low growth) and Option 2 (medium growth) would result in overall positive effects, while Option 3 would have overall</p>	

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	<p>neutral effects. Regarding Option 3 (high growth), it is noted that “<i>There are strong positive effects on the delivery of housing and economic growth but these are countered by the potential negative impacts on the environmental objectives.</i>” In conclusion, it is noted that:</p> <p>“<i>The preferred option SP12(ii) [Option 2 – medium growth] is for a level of growth that exceeds the current Local Housing Need, calculated according to the government’s standard method. This would boost supply of housing above the current development plan requirement and support economic growth, without significant negative environmental effects. <b>The level of growth in SP12(iii) [Option 3 – high growth] would require significant additional greenfield allocations, predominantly agricultural land, which would compromise sustainability objectives</b> while that in SP12(i) [Option 1 – low growth] would not lead to the boost to levels of housing delivery that are sought (our emphasis).</i>”</p> <p>When comparing Option 2 (520-575 dpa) with Option 3 (692 dpa), Option 3 has received a lower score against the following Sustainability Objectives:</p> <ul style="list-style-type: none"> <li>• 5b: To conserve and enhance the character of the landscape.</li> <li>• 5c: To protect or, conserve and enhance the significance of heritage assets.</li> <li>• 6a: To reduce air pollution.</li> <li>• 6c: To maintain and improve soil quality.</li> <li>• 7a: To maximise the use of previously developed land and buildings where appropriate.</li> <li>• 7b: To apply sustainable densities of land use appropriate to location and setting.</li> <li>• 8c: To reduce water consumption and promote reuse.</li> <li>• 8d: To reduce the consumption of minerals and promote reuse of secondary materials.</li> </ul> <p>No reasoned justification has been provided to explain why Option 2 has received a more favourable score against these Sustainability Objectives</p>	

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	<p>than Option 3. Instead, it appears that Option 3 has the potential to score more favourably against some objectives than Option 2, or at the very least, have an equal scoring. In particular, the SA scores Option 2 and 3 the same in relation to economic benefits (SA Objective 10), but clearly an increase in housing would deliver considerably more economic benefits.</p> <p>The PPG explains that the SA should “<i>identify, describe and evaluate...[the] likely significant effects on environmental, economic and social factors using the evidence base (our emphasis).</i>” We therefore consider that further evidence and justification is required to inform the assessment of reasonable alternatives and derive a robust conclusion.</p> <p>Furthermore, there is a significant ‘jump’ between the level of housing need in Option 2 compared with Option 3. To ensure that the SA “<i>consider[s] and compare[s] all reasonable alternatives</i>”, in line with the PPG (8), we recommend that an additional reasonable alternative/ Option is assessed.</p> <p>A suitable alternative Option would be to assess housing growth in the region of a 20%-25% uplift to the 2020 LHN of 513 dpa (615-640 dpa) up to the OAN set out in the 2016 SHMA of 665 dpa. Such a range would provide additional positive economic, social and environmental effects, including the delivery of additional affordable housing and help address affordability issues, without the negative environmental effects that may be associated with Option 3 (692 dpa). Following a review of the SA and assessment of the additional Option recommended, there may be a need for additional housing allocations to meet any increase in the Council’s housing need.</p> <p><b>Duty to Co-operate</b></p> <p>In line with paragraphs 24-27 of the NPPF, the Council has a duty to co-operate with other Local Planning Authorities (along with other prescribed bodies), on strategic matters that cross administrative boundaries. Engagement with neighbouring authorities should take place early in the</p>	

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	<p>Plan-making process. Such engagement should be constructive, active and ongoing, as confirmed by the PPG(9).</p> <p>The duty to co-operate has the potential to significantly influence the Local Plan Review, particularly the number of homes that the Council is required to accommodate. For example, paragraph 11b of the NPPF explains that “<b>strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas</b> (our emphasis).” If neighbouring authorities are unable to meet their needs in full, they should ask West Berkshire to assist them, which could increase the District’s housing requirement.</p> <p>Paragraph 6.4 of the draft Local Plan explains that there has been much collaborative working with neighbouring authorities on housing matters and associated infrastructure. Furthermore, paragraph 1.23 explains that “<i>The Council will prepare a Duty to Cooperate Statement to accompany the LPR and which will set out in detail how we cooperate on strategic cross-boundary issues in order to create and deliver a positively prepared plan.</i>”</p> <p>Paragraph 27 of the NPPF, along with the PPG (10), are clear that Local Planning Authorities should document the co-operation that has taken place with other parties as part of the Planmaking process, in line with the Duty. Furthermore, the PPG (11) confirms that “<i>As <b>the duty to cooperate</b> relates to the preparation of the plan it <b>cannot be rectified post-submission</b>, so if the Inspector finds that the duty has not been complied with they will recommend that the local plan is not adopted and the examination will not proceed any further (our emphasis).</i>”</p> <p>The above confirms that the Duty is a fundamental part of the Plan-making process and is a legal requirement that several Local Planning Authorities across the country have failed to satisfy. In light of this, as the Council has</p>	



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	<p>confirmed that co-operation has taken place, a record of this should be made publicly available as soon as possible.</p> <p>Pages 45-48 of the latest Annual Monitoring Report (AMR) (January 2021) provide a brief summary of the engagement that has taken place to date. This, however, does not refer to any recent discussions or provide any detail regarding strategic issues that need to be addressed or any agreements that have been made / ongoing discussions.</p> <p>Paragraph 6.3 of the draft Local Plan sets out that <i>“There has been no request to take unmet need from other authorities within the identified Housing Market Area(12), or from any other adjacent authority. In 2018 there was a possibility of some unmet need in Reading Borough, but this is no longer the case.”</i></p> <p>Shortly after the draft Local Plan was published for consultation, the Government published its response to the LHN proposals in the <i>“Changes to the current planning system”</i> consultation (13). In its response, the Government confirmed that a 35% uplift to the post-cap number generated by the Standard Method would apply to Greater London and to the Local Authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England.</p> <p>The list of the most populated cities and urban centres in England includes Reading Borough Council. Consequently, Reading’s housing need has increased significantly compared with the housing need that it previously anticipated having to accommodate.</p> <p>In summary, the current Reading Borough Local Plan (November 2019) makes provision for 689 dpa, while the “mutant algorithm” (August 2020) increased its housing need slightly to 700 dpa. However, this has now increased considerably to 876 dpa (December 2020). To assist with understanding the scale of the increase in housing need in Reading, based on the Plan period for the adopted Local Plan (2013-2036), the overall</p>	

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	<p>housing requirement would increase from 15,847 homes to 20,148 homes, requiring an additional 4,301 homes. This, coupled with Reading being a largely urban authority with limited options for greenfield development, is likely to result in Reading asking other authorities to help meet its housing need.</p> <p>West Berkshire District is located immediately to the west of Reading Borough and is therefore suitably placed to assist Reading with meeting any of its unmet housing needs. While approximately 74% of the West Berkshire comprises the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and other constraints, particularly areas at risk of flooding and the presence of Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield, significant opportunities remain to accommodate additional housing in sustainable locations. The District could and should therefore make a meaningful contribution to supporting any unmet needs of adjoining authorities, particularly Reading, given its excellent transport links and land availability.</p> <p>In addition to Reading, the other authorities in the Western Berkshire Housing Market Area include Bracknell Forest Borough Council and Wokingham Borough Council. Both authorities are in the process of preparing new Local Plans, which are yet to be submitted for examination. Both authorities are heavily constrained, with Bracknell Forest containing a large area of Green Belt and Special Protection Area (SPA), while Wokingham comprises a large area of Green Belt and Areas of Identified Biodiversity Interest. There are also significant concerns over the deliverability of the Grazeley Garden Town, which is a draft allocation in the emerging Wokingham Local Plan for a minimum of 10,000 dwellings within the Borough, with the Council anticipating that 3,750 of these will be delivered within the Plan-period up to 2036. There is therefore also the potential for Bracknell Forest and Wokingham to ask West Berkshire to assist it with meeting any of its unmet housing needs.</p>	

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	<p>As West Berkshire is currently only targeting the delivery of 9,775 new homes (upper range) over the Plan-period, discussions should be held with neighbouring authorities, particularly Reading, as early as possible, to understand the extent of any unmet housing need that West Berkshire may be required to assist with accommodating. This will ensure that the Local Plan is based on up-to-date evidence regarding potential unmet needs, in line with paragraph 1.24 of the draft Local Plan and paragraph 31 of the NPPF.</p> <p>If West Berkshire is required to accommodate any unmet housing needs from other authorities, additional sites should be allocated for housing. These should be distributed in line with the settlement hierarchy outlined in policy SP3.</p> <p>Furthermore, we encourage the Council to consider the allocation of reserve sites. Such a contingency is particularly important as the Council is relying upon two complex, large sites to deliver a large proportion of the homes required in the District.</p> <p>Reserve sites can be brought forward quickly in the event that there is a shortfall in housing supply against the Council's anticipated housing trajectory at any point over the Plan period. This will enable the Council to meet its Strategic Objective regarding housing, "<i>To ensure that the identified housing need will be met across the District <b>up to the end of the plan period</b> (our emphasis).</i>"</p> <p>The allocation of reserve sites will be particularly important if the unmet needs of other authorities is not clear as the West Berkshire Local Plan progresses. A working assumption as to the potential unmet needs that the District may be required to accommodate should be made – in collaboration with the respective authorities – to ensure that the Local Plan can be found sound in line with paragraph 35 of the NPPF.</p>	

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	<p><b>Housing Supply and Delivery</b></p> <p>Paragraph 6.8 of the draft Local Plan explains that “<i>Of the approximately 5,000 units already allocated [in the adopted Development Plan], only 1,071 had been completed by March 2020.</i>” As the previous Plan-period extended from 2006-2026, the Council is 14 years in, with 6 years remaining. The Council has therefore only secured the delivery of 21.4% of its current housing allocations, despite 70% of the Plan-period already passing.</p> <p>In addition, Table 2 sets out the Council’s housing supply position at March 2020. This confirms that 1,482 dwellings included in its future housing supply are existing allocations that are yet to receive planning permission.</p> <p>Furthermore, paragraph 6.11 explains that “approximately 74% of completions in the period 2006-2020 were on unallocated, windfall sites.” This suggests that a high proportion of planning decisions in West Berkshire have not been plan-led, which conflicts with paragraph 15 of the NPPF.</p> <p>The draft Local Plan proposes a windfall allowance of 1,979 dwellings to 2037. To ensure that planning decisions remain Plan-led, alongside providing greater certainty of housing supply, we feel it would be more sensible to reduce the windfall allowance and increase the number of housing allocations. The inclusion of additional allocations for residential development now would assist with the aim to plan holistically as opposed to relying on piecemeal developments through windfall sites.</p> <p>The points outlined above underline the importance of ensuring that a deliverable Local Plan is achieved in line with paragraph 16 of the NPPF. Ultimately, for the Local Plan to be found sound, as required by paragraph 35 of the NPPF, it must be “<i>effective</i>” and therefore “<i>deliverable over the plan period</i>”. It is clear that the current plan for the District has so far not achieved its objectives.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Paragraph 73 of the NPPF explains that “<i>Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period</i>”.</p> <p>A housing trajectory is not included in the draft Local Plan or its evidence base. To address this, paragraph 6.15 of the draft Plan explains that “<i>The housing trajectory showing the projected timeline for the delivery of housing developments across the plan period in relation to the annual average requirement will be included in the Submission version of this development plan.</i>”</p> <p>At present, it is not possible to determine whether the draft Local Plan and the proposed housing allocations are an appropriate basis for planning for the future of the District, or deliverable within the Plan-period. A housing trajectory should therefore be published as soon as possible.</p> <p>(2) <a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system</a></p> <p>(3) Paragraph: 010 Reference ID: 2a-010-20201216</p> <p>(4) Paragraph: 010 Reference ID: 2a-010-20201216</p> <p>(5) <a href="https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-placesconsultation-proposals">https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-placesconsultation-proposals</a></p> <p>(6) <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/927157/200805_Changes_to_the_current_planning_system.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/927157/200805_Changes_to_the_current_planning_system.pdf</a></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>(7) <a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system</a></p> <p>(8) Paragraph: 018 Reference ID: 11-018-20140306</p> <p>(9) Paragraph: 029 Reference ID: 61-029-20190315</p> <p>(10) Paragraph: 031 Reference ID: 61-031-20190315</p> <p>(11) Paragraph: 031 Reference ID: 61-031-20190315</p> <p>(12) Paragraph 6.4 of the draft Local Plan confirms that West Berkshire has a strong functional relationship with Wokingham Borough Council, Reading Borough Council and Bracknell Forest Council and the Council has collaborated with these authorities</p> <p>(13) <a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system</a></p> <p>Changes sought:</p> <p>We consider that further evidence and justification is required to inform the assessment of reasonable alternatives and derive a robust conclusion.</p> <p>We recommend that an additional reasonable alternative/ Option is assessed. A suitable alternative Option would be to assess housing growth in the region of a 20%-25% uplift to the 2020 LHN of 513 dpa (615-640 dpa) up to the OAN set out in the 2016 SHMA of 665 dpa.</p> <p>The District could and should make a meaningful contribution to supporting any unmet needs of adjoining authorities.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>We encourage the Council to consider the allocation of reserve sites. Such a contingency is particularly important as the Council is relying upon two complex, large sites to deliver a large proportion of the homes required in the District.</p> <p>We feel it would be more sensible to reduce the windfall allowance and increase the number of housing allocations.</p> <p>A housing trajectory should therefore be published as soon as possible.</p>	
Pegasus for Donnington New Homes (lpr1944)	<p><i>Representation on behalf of Donnington New Homes in support of continued allocation of Sandford Park</i></p> <p>Table 2 which supports this Policy identifies that Sandford Park will deliver 1,000 units within the Plan period. This target is considered to be a robust prediction which my client supports.</p> <p>As a technical point, para 6.13 of the supporting text to Policy SP12 refers to North West Thatcham. This is incorrect and should be amended to refer to North East Thatcham.</p>	Comments noted.
Barton Willmore for Copas Farms (lpr1971)	Draft policy SP12 sets the housing requirement for the District across the plan period. As indicated in our response to draft policy SP1 above, our client considers that the emerging plan should put further emphasis on the priority given to PDL, which supports the NPPF's emphasis on making as much use as possible of PDL or brownfield land. Such PDL can assist the District in meeting its housing needs, in particular the provision of small sites.	Comments noted. The plan does seek to optimise the use of previously developed land.

Respondent (with lpr ref)	Response	Council Response
<p>Montagu Evans for Royal &amp; Sun Alliance (lpr2445)</p>	<p><i>Full representation on behalf of Royal &amp; Sun Alliance Insurance promoting residential development at Greenham Road Retail Park is attached.</i></p> <p>We note that for a Plan to be found sound it must be positively prepared, which means the Plan must seek to meet the District's objectively assessed needs as a minimum. This is clearly stipulated by the NPPF under Paragraphs 11 and 35. We support that the Council has applied the Government's Standard Methodology for Housing Need to its housing targets in its emerging Plan, however we suggest the Council removes reference to the housing target being given as a range of "8,840 to 9,775 net additional homes". This would make it clear that the minimum target is 9,775 and ensure the Plan unambiguous to the reader. This is also important for monitoring the Council's performance in housing delivery once the Plan is adopted.</p> <p>In the draft Local Plan the Council identifies its housing supply under Table 2. This outlines that the Council can identify 6,135 homes from consented sites, currently allocated sites and through proposed allocations. This results in a shortfall of 3,640 against its target that will need to be met in the Plan period. We note that the Council suggests windfall sites would provide 1,979 units across the Plan period and the Council has explicitly excluded future windfall sites of 10 units or more (and prior approvals for permitted development) from this allowance. We therefore dispute whether sufficient large windfall sites will come forward because much of the District is rural in nature and heavily constrained. This is acknowledged by the Council in the draft Local Plan:</p> <p><i>"About 90% of the District is rural in character. The North Wessex Downs Area of Outstanding Natural Beauty (AONB) is a nationally important and legally protected landscape, designated for the quality of its scenic beauty. Approximately 74% of West Berkshire is within the AONB".</i></p> <p>It therefore follows that the Council will have exhausted much of the supply of windfall sites already, which is evidenced by the Council conceding that</p>	<p>Support for application of standard methodology noted.</p> <p>The Council believes that the range provides some flexibility to the plan and meets the objective of boosting housing delivery. The monitoring of delivery will be measured against this range.</p> <p>The windfall allowance is considered modest in relation to past delivery. See response to Fisher German LLP for Mr Musgrave and Mr Begley (lpr1229). The Council has not included a windfall allowance for medium and large sites, but these are anticipated to continue to come forward (some have been proposed and assessed through the HELAA). These will add flexibility to the supply but are not relied upon to meet the housing requirement. There is no indication that the supply of windfall sites is exhausted, the delivery on windfall sites continues to be high as evidenced in the AMR.</p> <p>The Council are prioritising development for residential uses in urban, accessible locations. The focus for development is on the more sustainable settlements, particularly on Newbury and sites that come forward within settlement boundaries, which are acceptable in principle for residential development, will be assessed against the Local Plan policies.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>74% of completions between 2006-2020 were on unallocated windfall sites. We therefore question the robustness of the windfall allowance. The NPPF (Paragraph 70) makes clear that local planning authorities must provide:</p> <p><i>“Compelling evidence that [windfall] will provide a reliable source of supply. Any allowance should be realistic having regard to... historic windfall delivery rates and <u>expected future trends</u>” (our emphasis).</i></p> <p>It is apparent that the windfall rate is not justified and so up to 3,640 homes are not yet accounted for by the Council in its emerging Plan. We remind the Council that the NPPF (Paragraph 123) makes clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, policy-makers must:</p> <p><i>“Ensure that developments make optimal use of the potential of each site. In these circumstances... plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”.</i></p> <p>In order for the Council to meet its substantial minimum housing targets, the Council must properly assess and make allocations for sufficient development sites through the Local Plan. To achieve sustainable development, the Council must prioritise maximising development for residential uses in urban, accessible locations (as explained above). It follows that additional allocations should be prioritised in Newbury given it is established as the primary settlement in the District. This must also be done to avoid speculative applications in inappropriate and unsustainable locations in the District in the future.</p>	

Respondent (with lpr ref)	Response	Council Response
TOWN for Pincents Lane (lpr2117)	<p><i>Full representation promoting land to East of Pincents Lane, Tilehurst attached .</i></p> <p>It is unfortunate that nowhere in the Emerging Draft document is there an unpacking of the calculation of Local Housing Need. Given the complexity of parts of the formula, as set out in the PPG, in the interests of transparency it would have been helpful for the Council to “show its workings” on an issue at the heart of the key strategic policies of the plan.</p> <p>In the Updated Housing Needs Evidence, produced by Icenl (May 2020), at Table 5.1, there is a breakdown of calculation of the (presumably 2019) figure for LHN of 520 dpa. Although it is noted that the figure of 513 dpa (as a minimum) concurs with the figure published by MHCLG in December 2020, the latter publication contains the note that “<i>All figures presented are based on data available at the date of publication and should not be considered as definitive for local planning decision or plan making...</i>”</p> <p>Emerging Draft Policy SP12 translates these considerations into a ‘requirement’, stated as a range, with the supporting text noting that the upper end of the range of 575 dwellings ‘is a target’ but not a cap on development. The approach of regarding the housing requirement as a ‘floor’ rather than a ‘ceiling’ target is welcomed, though this should be strengthened in both policy and text (for example at paragraph 6.5).</p> <p>Furthermore, there is no explanation of how the LHN figure of 513 dpa has been translated into the target of 575 dwellings. It can be inferred that an uplift of approximately 10% has been applied but again there is no transparency or reasoning in the plan on this point.</p> <p>Table 1 (<i>in full representation</i>) sets out the numbers of units delivered in West Berkshire over the past four years, all below even that target level of 575 dwellings – as well as being below the target figure for each year.</p>	<p>The calculation of the LHN will be shown in the Housing Background Paper which will accompany the Reg. 19 consultation. A calculation is shown in Table 2.1 of the latest published Five Year Housing Land Supply. This has, however, now been superseded by the 2022 calculation which results in a LHN of 513 dpa.</p> <p>The support for the approach of regarding the housing requirement as a ‘floor’ rather than a ‘ceiling’ target is noted. It is, however, considered that the policy and text are clear on this issue.</p> <p>Additional text will be considered for the supporting text to briefly explain use of a range and further explanation will be given in the Housing Background Paper which will accompany the Reg.19 consultation.</p> <p>The representation argues that, though delivery has been broadly within the range proposed by draft policy SP12, the affordability ratio of median house prices to residence based earnings has grown, showing that delivery in the range proposed is doing little to curtail the increasing unaffordability of housing in West Berkshire. The affordability ratios have, however not changed significantly; the latest residence-based ratio, for 2022, is 9.73, which is below the ratio in 2017 and 2018. The LHN is calculated using the workplace-based ratio and this has fallen steadily, albeit by a small amount, since 2017. The LHN, calculated using this ratio as an uplift to the 2014 household projections over a ten year rolling period, has fallen year on year for West Berkshire. As the LHN factors in the affordability issue, resulting in a need that is substantially higher than projected household growth, it is not considered that a further increase in the requirement, which already slightly exceeds the LHN, is justified. It is</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Although below the respective target figures, in three out of the past four years delivery has been broadly within the range proposed by draft policy SP12. Yet during that period the ratio of median housing prices to residence-based earnings has grown as set out in Table 2 (<i>in full representation</i>).</p> <p>The figures in Table 2 therefore show that delivery in the range proposed is doing little to curtail the increasing unaffordability of housing in West Berkshire. Raising the housing target would create a greater supply and act to depress growth in house prices in the District. It would also meet the Government's objective, as enshrined in the NPPF, of significantly boosting the supply of homes.</p> <p><u>Provision for unmet need in neighbouring areas</u></p> <p>Paragraph 6.3 of the Emerging Draft notes the following:</p> <p><i>6.3 There has been no request to take unmet need from other authorities within the identified Housing Market Area, or from any other adjacent authority. In 2018 there was a possibility of some unmet need in Reading Borough, but this is no longer the case.</i></p> <p>The Submission Draft Reading Borough Local Plan identified a shortfall of 644 dwellings in the period 2013-2036, to be met by neighbouring authorities. This was reduced to 230 dwellings by the Local Plan Inspector in her Main Modifications to the draft Plan, subsequently adopted in November 2019. It is understood that no formal request has been made to the neighbouring authorities to absorb any of this unmet need.</p> <p>However, paragraph 6.6 of the Emerging Draft WB Local Plan recognises the need to keep policy SP12 under review. In December 2020, Government announced that it was abandoning its proposed changes to the Standard Method. For most local authority areas, the formula is to remain unchanged, but with an uplift of 35% of the figure for housing need to be applied across London and the largest 19 urban areas in England. This includes</p>	<p>also questionable whether developers would be prepared to deliver new housing to the extent that an increased supply would act to depress growth in house prices.</p> <p>Please see response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Reading, as recognised by an indicative housing need figure of 876 dpa for that Borough, published by Government the same month.</p> <p>Whilst the PPG suggests that the uplift only applies to the local authority which contains the largest proportion of population, it is inconceivable that the now-required full uplift could be met within Reading Borough area alone, given that a shortfall was recognised in 2019 for a target of 689 dpa and that has now increased to around 876 dpa.</p> <p>In the interests of prudent and effective plan making therefore, some provision for unmet need arising from Reading Borough should be made in the Local Plan Review. The eastern part of West Berkshire is functionally part of the Reading housing and employment market and this additional provision should therefore be met there.</p> <p>The housing target figures should be increased to provide a greater amount of supply for local needs (reflecting non- delivery on some allocated sites, flexibility and choice) and to provide for unmet need likely to arise in Reading Borough.</p>	
JSA Architects for Mark Berry (lpr767)	<p>The Colthrop Village Consortium do not disagree with the overall housing figure but they consider that the proposed urban extension to North East Thatcham is flawed for the reasons set out in the letter prepared on their behalf by JSA Architects dated 4 February 2021 along with the associated Technical Note prepared by Stuart Michael Associates on Transport.</p> <p><b>Look again at the relative merits of the THA1 site, recognise that parts of the proposed North-East Thatcham allocation are not suitable or appropriate and that sequentially there is a justification for re-looking at the Rainsford Farm/ former Colthrop Paper Mills site despite the</b></p>	<p>Comments regarding overall housing figure noted.</p> <p>See comments and responses to SP17 and SP13 regarding North East Thatcham and residential sites in the Newbury and Thatcham area.</p>

Respondent (with lpr ref)	Response	Council Response
	<b>flood risk affecting some of the land. Rebalance the growth of Thatcham and put more housing in proximity to the railway station.</b>	
Turley for Commercial Estate Group (lpr2358)	<p>Broadly agree.</p> <p>CEG generally supports the Council's strategic objective for housing and the approach to housing delivery in so far as it seeks to provide sufficient housing to meet identified needs whilst not curtailing the delivery of housing throughout the plan period (i.e. the housing figure is neither seen as a ceiling or a cap to development). This ensures that the plan provides flexibility and largely meets the requirements of the National Planning Policy Framework (The Framework).</p> <p>The Local Development Scheme currently envisages adoption in December 2022 but there are recent experiences where the Examination process has taken considerably longer than envisaged. Given the local plan are supposed to have a 15-year time horizon from adoption CEG consider that this emerging Local Plan should have an end date of 2038 rather than 2037 to build in some flexibility from the outset. This would require an additional year's worth of housing land to be identified, especially on the edge of sustainable settlements.</p> <p>Concern exists, however, about the Council's rigid approach to the allocation of sites for development. In particular the heavy reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandleford Park and evidenced through consultant papers such as the 'Start to Finish' Report 2nd Edition prepared by Lichfields).</p> <p>In the absence of a Housing Trajectory within the documentation or</p>	<p>Support for approach noted.</p> <p>The Local Development Scheme published in June 2022 anticipates adoption of the LPR in September 2024. The LPR therefore covers a 15 year period through to 2039.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>A trajectory will be prepared to accompany the Reg.19 consultation and will be reviewed annually and reported in the AMR.</p> <p>It is not considered that a criteria-based policy for sites on the edges of sustainable settlements would be appropriate. The plan will be subject to five yearly review and annual monitoring will indicate if policy changes are needed.</p> <p>With regard to the promoted site see response to SP13 (lpr2359).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Appendices CEG therefore reserve the right to make more detailed comments on the delivery and lead in time of strategic sites at a later stage.</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner. Directing such to sustainable settlements would accord with the current spatial strategy.</p> <p>One example of this is the land to the North of Newbury. Part of the land benefits from planning permission for up to 401 dwellings, a local centre and a primary school and work has commenced to implement that permission. There is the opportunity for further housing to occur which would capitalise upon these new social and community facilities.</p> <p>Additional land in this location was covered by the Environmental Statement (ES) which was submitted in support of the application but did not form part of the development scheme itself. The ES demonstrated that the additional land was suitable for future development to assist in meeting the Council's housing needs in a location which is sustainable and where there are limited constraints to development.</p> <p>The Council's own assessment of the wider site within the HELAA (December 2020) stated that this site is well related to Newbury and that it should be considered as part of a future potential strategic site. The Council has accepted that the site is suitable for development and in positively preparing the plan should be considering the positive contribution that a flexible approach to additional housing in locations, such as North Newbury, can make to ensuring that the plan meets its objectives. This would</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Consideration should be given within Policies SP13 -15 to identifying additional sites to provide more flexibility for the plan to deliver the identified housing numbers (including up-to 2038), as a minimum, and to ensure that any delays to the delivery of large strategic sites does not adversely impact on the Council's ability to meet their housing needs.</p>	
Westbuild Homes (lpr2134)	<p>Westbuild broadly support the Council's approach to the delivery of housing set out within Policy SP12, but have some reservations about specific matters which are set out below.</p> <p>Westbuild generally supports the Council's proposed approach to the delivery of housing and specifically the recognition that the housing figure is neither seen as a ceiling, or a cap.</p> <p>Significant concern exists, however, about the Council's over-reliance on two large strategic sites. The Council's own experience, and that on a national level, is that strategic sites have lengthy lead-in times, and are inherently slow in delivery, and this should be reflected within the emerging plan review through the inclusion of criteria for sites not proposed for allocation to be considered, increasing the flexibility afforded to the Council and reducing the reliance upon strategic sites.</p> <p>Paragraph 6.10 of the draft emerging plan refers to paragraph 68 the National Planning Policy Framework (The Framework) and the weight that should be attributed to the benefits of using suitable sites within existing settlements for homes. What it fails to have any regard to, however, is the sub section <b>Paragraph 68(d)</b> which states that local planning authorities should:</p>	<p>Broad support noted.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>“work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”</i></p> <p>Westbuild contends that without reference to the part of the Framework, and the inclusion of such provisions within the proposed policies, the plan is flawed in its approach and does not fully meet the tests of soundness.</p>	
Lichfields for North East Thatcham Consortium (lpr2399)	<p>(Full representation attached)</p> <p>Policy SP12 of the draft local plan makes provision for between 520 and 575 dwellings per annum between 2020 and 2037:</p> <p>1 The lower end of the range (520 dpa) is based on the standard methodology as originally published in 2017 (figure calculated as of 2020); and</p> <p>2. The upper end of the range (575 dpa), although not explicit, appears to be similar to the figure arising from proposed changes to the standard method which were published for consultation in Autumn 2020. Ultimately these proposed changes were not taken forward and Government instructed authorities to continue progressing on the basis of the original standard methodology, published in 2017, until a new system of housing requirements is implemented through the longer-term changes set out in the Planning White Paper.</p> <p>Given the upper end of the range proposed in the draft local plan is based on a methodology which has now not been implemented, this would (in isolation) indicate the need for the Council to provide additional explanation for why it has articulated an upper range for its estimate of housing need.</p> <p>For the purposes of planning in West Berkshire, it would be prudent for the Council to consider that its housing needs may be higher than the range proposed in order to minimise the risk that an early review is needed to</p>	<p>The housing requirement is expressed as a range in order to increase the target housing requirement above the LHN and therefore boost housing supply. An uplift of approximately 5% is considered appropriate to allow flexibility in the supply. Additional explanation for the use of a range will be made in the Housing Background Paper that will accompany the Reg.19 consultation.</p> <p>See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.</p> <p>See response to Barton Willmore for Donfield Homes (lpr2098) regarding consideration of affordability issues and the assessment of need.</p> <p><b>Housing Supply</b></p> <p>Comment that it would appear that sufficient additional supply has been identified is noted.</p> <p>The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. The Plan does, though, support development of previously developed sites within the settlement</p>



Respondent (with lpr ref)	Response	Council Response
	<p>assist in meeting future unmet housing needs from Reading, and to positively embrace the question of how that need might be met.</p> <p>The Council's Updated Housing Need evidence identifies an annual affordable housing need of 319 per annum which it describes as "<i>substantial</i>" and, if a notional 35% of all new housing was affordable, this would equate to a need for 910 dwellings per annum. The needs assessment states that "<i>the Council might consider whether higher housing provision would have positive benefits on affordable housing delivery.</i>" This provides a clear basis for recognising the basis of an increase, and we do not agree with the Updated Housing Need evidence conclusion (at para 9.12) that affordable housing does not specifically justify a higher housing requirement; it clearly does.</p> <p>In summary, the NPPF and PPG are clear that the standard method should form the basis of strategic policy requirements, albeit it should be treated as a minimum as it is not necessarily the definitive need figure for an area. Where evidence suggests needs within an area are higher, authorities should plan accordingly; such an approach is consistent with the Government's overarching "<i>objective to significantly boost the supply of housing</i>", including to deliver 300,000 homes per year nationally by the mid-2020s. In the case of West Berkshire, evidence produced to date (by the Council itself) suggests that housing need could be in excess of 665 dpa, it is also likely that Reading will now require assistance to meet its additional housing needs under the standard method, and there is an affordable housing need that, at a realistic proportion of housing delivery, would require an increased housing requirement figure.</p> <p><b>Housing supply</b></p> <p>Against the current minimum requirement for the plan period 1,979 dwellings, the Council already has sufficient supply to deliver 8,114 units from existing commitments<sup>10</sup> (equivalent to 92%). Policies SP13 to SP15</p>	<p>boundaries and any large and medium sites that do come forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met.</p> <p>The windfall allowance is based on past trends for small sites. This type of site is rarely submitted in advance in response to a Call for Sites and there are a limited number in the HELAA. There are, however, a number of medium sized sites within settlement boundaries that have been submitted for consideration, which are not proposed for allocation as they are already regarded as suitable in principle for residential use. These are the sites that can be evidenced to show the flexibility built into the plan and the additional justification for use of a windfall allowance as a component of the land supply.</p> <p>The typo will be corrected.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>allocate additional housing sites in order to bridge this gap. At this stage no trajectory has been published of expected supply within the plan period including emerging allocations; but it would appear that sufficient additional supply has been identified.</p> <p>We will consider the buffer above the minimum requirement, lead-in times and delivery rates proposed as and when a future trajectory is published.</p> <p>It is worth noting that the PPG states (at ID2a-015) that <i>“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”</i>. This clearly points to the basis for LPAs to go above the minimum starting point.</p> <p>Of the existing commitments, the Council identifies a windfall allowance of 1,979 units. The total figure consists of a 140 dpa allowance across the whole plan-period starting in 2020 minus existing small permissions that area included in the supply. The proposed 140 dpa windfall allowance is equivalent to 27% of the current minimum annualised requirement figure (520 dpa). Regarding windfalls, the NPPF states that:</p> <p><i>“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”</i> (Paragraph 70). Consequently, the default starting position is that there should be no windfall allowance. While that is the starting point, we do agree there is compelling evidence that a windfall allowance is justified. Indeed, much of West Berkshire’s supply has previously been delivered on windfall sites as set out in Paragraph 6.11 of the Reg.18 plan. However, it is not</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>clear that the assumed rate is necessarily justified with reference to the HELAA.</p> <p>3.23 We consider a more robust approach for the emerging plan would be to reduce the windfall allowance and in so doing rely more upon the delivery of homes from existing and proposed allocations. While undoubtedly windfalls will continue to deliver a significant proportion of West Berkshire's supply, relying more on existing and proposed allocations provides additional certainty to communities as to what development will occur in their area. Windfalls are likely to reduce as a new plan is adopted which will deliver West Berkshire's housing needs plus a buffer of sites above the minimum requirement to account for non-delivery. In this instance we therefore think that there is a case to place less of a reliance on unidentified windfall supply making up a significant proportion of the current minimum requirement and instead to rely on the delivery of identified supply including the allocations.</p> <p>There is a minor typo at para 6.13 of the supporting text which refers to North West Thatcham, as opposed to North East Thatcham.</p>	
Hallam Land Management (lpr2335)	<p><i>Full representation promoting the allocation of Land at Kiln Lane, Mortimer is attached.</i></p> <p>Hallam supports the use of the housing figures based on the 2014 household projections, in line with the latest guidance from the Ministry of Housing, Communities and Local Government and, in terms of West Berkshire housing need, a suitable range has been included in this emerging draft for the initial stages of consultation (note comments above regarding unmet housing need and the Duty to Cooperate).</p> <p>Although it is considered sensible within this policy to retain the allocation in the Mortimer NDP, it is important to distinguish this allocation, which</p>	<p>Support for approach noted.</p> <p>See response to representation on SP14 (lpr2337) regarding allocation of sites in Eastern Area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>addresses a need to 2026, from housing need for the subsequent 10-year period.</p> <p>Policy SP 14 highlights that of the 12 sites proposed for allocation in the Eastern Area in the emerging Local Plan, 9 are existing allocations which have not yet come forward. In short therefore there are only 3 new allocations in the Eastern Area. Policies SP 13 and 15 reflect similar trends. This does not demonstrate the 'positive' and 'aspirational' approach advocated in the NPPF or respond to the social and economic relationship this area has with Reading as described above, and which itself justifies the <b>need to provide additional allocations to ensure the Plan allocates a balanced and sustainable portfolio of sites which will be delivered in a timely manner and to ensure that a continuous and flexible supply of land is available throughout the Plan period.</b></p>	
Savills for Englefield Estate Office (lpr1529)	<p>The LPR Emerging Draft identifies a local housing need (LHN) of 513 dwellings per annum using a baseline of 2020 and 520 dwellings per annum using a baseline of 2019, which is broadly akin to the current Core Strategy housing requirement. Paragraph 60 of the NPPF (paragraph 60) states that the standard method for calculating housing need should be used to 'inform' the 'minimum number of homes needed'. Indeed it is noted that the housing target of 520-575 dwellings per annum to 2037 set out in draft LPR Policy SP12 includes additional provision above the LHN.</p> <p>However, as set out in the AMR (Table 3.4), the Core Strategy housing requirement of 525 dwellings per annum has not been met in 7 of the previous 13 years (with delivery averaging 503 dwellings per annum), and therefore there is currently a shortfall of 275 dwellings against the Core Strategy requirement. This is likely to worsen in the future given the lack of delivery at strategic sites such as Sandleford Park. Accordingly, in order to address the shortfall in delivery during the Core Strategy plan period and ensure sufficient supply and flexibility over the LPR plan period, it is recommended that the LPR housing target is set at a minimum of 575</p>	<p>The housing target is based on delivering the LHN at the minimum but with a target some 5% higher in order to boost supply and provide flexibility.</p> <p>The Core Strategy will continue to be monitored through the AMR until it is replaced by the LPR but guidance is clear that any shortfall is already accounted for in the calculation of the LHN.</p> <p>The shortfall in delivery against the Core Strategy is not anticipated to worsen; the latest Five Year Supply document shows that there is a deliverable supply to meet the Core Strategy target without any contribution from Sandleford Park. This demonstrates the flexibility that was built into the Core Strategy to meet the housing requirement.</p> <p>The LPR will be subject to ongoing monitoring.</p>

Respondent (with lpr ref)	Response	Council Response
	<p> dwellings per annum. It is also important that the target of 575 dwellings per annum is not a ceiling or cap to development as set out in draft LPR Policy SP12, but is expressed as a minimum in accordance with paragraph 60 of the NPPF (and in order to meet the objective of national policy to meet the housing needs of present and future generations (paragraph 8), and significantly boost the supply of new homes (paragraph 59)).</p> <p>The LPR should be subject to ongoing monitoring, in accordance with the NPPF, in order to ensure that sufficient housing is being delivered based on the LPR target, and be flexible enough to respond to non-delivery of identified sites or changing circumstances during the plan period. The Planning White Paper (paragraph 2.51) emphasises the need to review Local Plans every 5 years or <i>'sooner than five years where there has been a significant change in circumstances'</i>, e.g. issues with land supply or changes to the DEPZ</p>	
Pegasus Planning Group Ltd for Newbury & Crookham Golf Club (lpr2054)	<p>This policy states that at least 575 dwellings per annum (9,775 dwellings in total) will be provided from April 2020 to March 2037. It states that the target figure of 575 dwellings per annum does not constitute a ceiling or cap to development. New homes will be located according to policies SP1, SP3 and DC1. It is important for the council to ensure that the reference to the housing target figure not being a “ceiling or cap to development” is retained in the policy. This is because this is a positive message to send out whilst there is a nationally recognised shortage of housing in the UK and any policy that seeks to facilitate additional housing provision at this time is to be encouraged.</p> <p>The policy states that new housing will be focused in and adjoining the larger settlements, including the largest and most sustainable settlement of Newbury. Therefore, a development of c.35 dwellings on land at Newbury and Crookham Golf Club, on the eastern edge of Newbury, will comply with policies SP1 and SP3, which will enable housing to be provided to meet the council’s housing requirements, as set out in policy SP12. The proposed 35</p>	<p>Support for reference to the housing target figure not being a “ceiling or cap to development” is noted.</p> <p>See response to representation on SP13 (lpr2056) regarding promoted site.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>or so dwellings (potentially including affordable housing, subject to viability) will make a valuable contribution towards the housing needs of the district. The allocation of land on the edge of Newbury at NCGC will comply with this policy, by helping to provide much needed new housing in a sustainable location, where the impacts of development can be satisfactorily mitigated.</p> <p><i>Policy SP12 – Approach to Housing Delivery is supported. However, it is considered that the text should not be amended to remove reference to the delivery of housing over and above the “target figure” of 575 dwellings per annum.</i></p> <p><b>Table 2 Housing Supply at March 2020 referred to</b></p> <p>Paragraph 6.12 states that the requirement of 9,775 dwellings minus the supply of 8,114, means that sites for a further 1,661 homes need to be found. In addition, there needs to be some built-in flexibility to allow for phasing issues and to allow for non-delivery, particularly of larger sites, which need a great deal of up-front investment in roads and other infrastructure. Therefore, it is important to make it clear that the current shortfall of 1,661 dwellings should be a minimum and not a ceiling or a cap to development, as required by policy SP12 (see above).</p> <p>It is likely that larger sites identified in the Local Plan will have some problems with delivery. It is unlikely that they will deliver the housing numbers predicted in the suggested timescales, because all larger sites encounter issues with such matters as site assembly, ownership and title issues, capital funding, infrastructure costs and delivery, planning permissions and legal undertakings, such as section 38, 106 and 278 agreements.</p> <p>Some larger sites are also the subject of vehement objections from residents and may not actually come forward in the local plan. Overall, it should be expected that the larger sites will not deliver the housing numbers needed in a timely fashion and there is a real need for more medium-sized and smaller</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>sites, of less than 100 dwellings, to help to fill the gaps. Smaller sites can be delivered in short time frames, as they do not have the depth of issues that the larger sites have. Therefore, the council should allocate more smaller sites to ensure that housing needs are met in the short to medium-term.</p> <p><i>Table 2 and Paragraph 6.12 – Housing Supply at March 2020 is supported. However, it is considered that it should be made very clear that the current shortfall of 1,661 dwellings is a minimum provision and not a ceiling or cap on development.</i></p>	
Sovereign Housing Association (lpr2161)	<p>SHA broadly support WBDC approach to housing delivery where the LPR sets out a housing need figure for the Local Authority area of between 520-575 dwellings per annum. SHA believe housing targets should be aspirational, seeking not only to meet the minimum level of demographic growth but also support economic growth and address local affordable housing need. SHA support a minimum target of 575 homes per annum to deliver the necessary homes for WBDC. Whilst there has been much deliberation around the proposed revised methodology for assessing housing need and the proposed removal of the duty to co-operate, the NPPF still requires authorities to engage with their neighbours and take account of any adjoining unmet need. To avoid worsening affordability across the wider HMA we urge the council to engage proactively and positively with its neighbours where there is a clear unmet need to be addressed.</p>	<p>Support for approach noted.</p> <p>The minimum requirement is that to meet the LHN, with the upper end of the range representing the target figure.</p> <p>See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.</p>
LRM Planning for Bloor Homes & Sandlesford Farm (lpr2172)	<p>The NPPF expects the planning system to significantly boost the supply of new housing by providing, in the first instance, a sufficient amount of development land where it is needed (para 59 refers).</p> <p>It is clear that a Local Plan's housing requirement is to be calculated by reference to the Government's Standard Method, unless exceptional circumstances can be proven (para 60 refers).</p>	Support for approach noted.

Respondent (with lpr ref)	Response	Council Response
	<p>In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</p> <p>In December 2020, the Government published its revisions to the Standard Method. The indicative level of local housing need for West Berkshire is recorded as 513 dwellings per annum. This is comparable to the lower end of the range in Policy SP20 of 520 dwellings per annum.</p> <p>When considering neighbouring authorities in the Western Berkshire Housing Market Areas, Reading has been subject to the ‘cities and urban centres uplift’, and its’ requirement has increased by 230 dwellings per annum. This could give rise to unmet need that may result in a duty to co-operate consideration and for West Berkshire’s housing requirement being increased. Equally, there may be economic and infrastructure reasons why additional housing should be located in West Berkshire.</p> <p>For these reasons, we agree the Local Plan should be based on a minimum requirement and we recognise that the allocation of sites aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility.</p>	
Carter Planning Ltd for Mr R L A Jones (lpr1901)	<p>The overall housing requirement of between 8,840 to 9,775 between 1 April 2020 and 31 March 2037 or 520 to 575 dwellings per annum is unlikely to be inadequate to meet housing needs.</p> <p>Whilst it is understood that these figures are not a ceiling or cap, nevertheless as a minimum requirement reflecting need they are unlikely to be adequate.</p>	<p>The housing requirement is based on meeting the minimum requirement of the LHN with a target some 10% higher.</p> <p>Regarding the two principal reasons why Carter Planning feel the requirement is inadequate to meet needs:</p> <ul style="list-style-type: none"> <li>• See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area.</li> <li>• The Government did not amend the LHN formula for West Berkshire. It stands at 513 in 2022.</li> </ul>



Respondent (with lpr ref)	Response	Council Response
	<p>There are two principal reasons for this. The first is that (as we have stated elsewhere) there is no information on the housing requirement likely to have to be met from adjoining Boroughs such as Reading, Wokingham or Swindon through the Duty to Cooperate etc.</p> <p>Secondly it is appreciated that the Council made the housing needs calculation based upon the mechanism appertaining at the time but of course the Government's new mechanism from 16 December 2020 for housing need calculation is likely to result in a higher figure.</p> <p>Notwithstanding our comments on the overall housing figure in respect of Policy SP12 we wish to raise a specific objection to "Table 2 – Housing Supply at March 2020". This Table includes "Allocations without permission". In detail, and in particular under sites in Lambourn at policies RSA 22 and 23, and in separate representations we have explained why two sites included in the previous Plan have not come forward and indeed one of them has been refused planning permission. Therefore it should not be assumed that Sandleford Park and in particular "HSA DPD sites" which are to supply a total of 1,482 dwellings will come forward. These should be re-examined and if necessary new/additional sites allocated. In addition to have a quarter of the sites as uncertain windfalls (1,979 of 8,114) is unacceptable.</p> <p>Additional sites should be allocated to provide the certainty expected of a new Plan</p> <p>Update the overall housing requirement to meet the need arising from the duty to cooperate and based upon the Government's latest mechanism for calculating housing need dated 16 December 2020.</p> <p>Re-examine HSA DPD Sites to see whether they are still available and can be developed and, if not find additional, replacement sites which should</p>	<p>With regard to issues related to sites in Lambourn please see responses to SP15 (lpr1902).</p> <p>The deliverability of existing allocations has been re-assessed and sites that are not considered developable, that is with a reasonable prospect that they could be viably developed at the point envisaged, will not be included in the Local Plan.</p> <p>The windfall allowance is a modest one in comparison to the level of windfall development over the plan period so far. The Plan does, though, support development of previously developed sites within the settlement boundaries and any large and medium sites that do come forward will contribute to the windfall element of supply and add to the flexibility needed to ensure housing needs can be met.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>include our Client's site LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive".</p> <p>Reduce the element of windfalls in the Draft Plan from the high level of one quarter of all sites.</p>	
<p>Woolf Bond Planning for JPP land &amp; Spitfire Bespoke Properties (lpr2317)</p>	<p><i>See attachments for full response.</i></p> <p><b><u>Assessment of Local Housing Need.</u></b></p> <p>Paragraph 4.4 acknowledges that the current assessment of housing need for the district results in a minimum annual requirement of at least 513dpa, using a 2020 base date. The NPPF (paragraph 60) is clear that an authority should address the minimum annual need arising from the calculation of local housing need (currently 513dpa for West Berkshire) alongside any needs that cannot be meet in adjoining authorities.</p> <p>The neighbouring authority of Reading Borough adopted its Local Plan for the period 2013 to 2036 in November 2019. This requires the delivery of at least 689 dwellings annually over this period (equating to 15,847 dwellings over the 23 year plan period).</p> <p>The current version of the PPG (ID ref 2a-004-202001216) indicates that Reading borough is one of the selected authorities whose housing requirement is uplifted by 35%. Applying the same 2020 base date as West Berkshire Council have applied results in a minimum annual need for 876 dwellings in Reading Borough. This is 187 dwellings annually above that which Reading Borough have committed to delivering. Although paragraph 6.3 suggests that there is no unmet need arising from Reading Borough, this would not reflect an assessment of that authority's need under the latest version of the PPG.</p>	<p>See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.</p> <p>The Local Development Scheme published in June 2022 anticipates adoption of the LPR in September 2024. The LPR therefore covers a 15 year period through to 2039.</p> <p>The existing housing allocations in the HSA DPD have been rolled forward, but where the site is completed or where construction is underway, they will be excluded from the LPR (eg RSA6 will be amended to exclude that part that is now complete). All sites will also be reviewed to take account of any representations and/or additional information.</p> <p>Where units on HSA DPD allocations were completed by 31 March 2022 they have not been included in the housing supply figures for 2020 -2037. The figures in Table 2 show only the outstanding dwellings with permission (those under construction or not started at 31 March 2022). The supply at 31 March 2022 and progress on allocated sites is reported in the 2022 AMR, which will be published in January 2023.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Additionally, the NPPF (paragraph 22) is clear that “Strategic policies should look over a minimum 15 year period from adoption”, which pursuant to paragraph 20 includes the overall scale of residential development.</p> <p>The current Local Development Scheme (April 2020) indicates that adoption of the emerging Local Plan is expected for December 2022, following a consultation of the pre-submission version in May 2021 and submission to the Secretary of State in October 2021.</p> <p>The Council’s expectation of adoption in December 2022 does not support the envisaged end date of the document in March 2037 as this would provide for only 14 years post adoption, and discounts any event delays the ongoing preparation. Such delays are considered likely as our review of the timeframe for the adoption of Local Plans covering strategic matters since the original NPPF was published in March 2012 [<i>Footnote 1: Data from Local Plans: the examination process - GOV.UK (www.gov.uk)</i>] indicates that for those where consultation of a draft Submission document occurred from March 2012 until January 2021 took on average 749 days to reach adoption. This is therefore just over 2 years and consequently should consultation of a draft Submission Plan take place in May 2021 as envisaged, adoption could realistically be envisaged for May 2023.</p> <p>Therefore, West Berkshire should consider further extending the Plan period to ensure that it remains consistent with national policy, whilst providing greater flexibility for revisions to the timetable and a realistic timeframe from consultation on a submission document through to adoption.</p> <p>Since West Berkshire adjoins Reading Borough, consideration should be given to the potential to accommodate further homes in the district, notwithstanding the current approach. Whilst we acknowledge that the draft Local Plan includes a number of allocations, for the reasons outlined in this statement, it is not considered that sufficient land has been identified, especially to meet an extended plan period consistent with the minimum</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>requirements of the NPPF together with unmet needs from adjoining authorities i.e. Reading Borough.</p> <p>Provision of additional sites would also address the uncertainty with respect of the realism associated with the Council's expectations of delivery from the various sources since the authority has not published the full details of the supply at 1st April 2020.</p> <p>The failure to publish the full details is illustrated by the incorrect assessment of sites within the emerging Local Plan, such as the land at Pyle Hill, Greenham, Newbury (Previously recorded under SHLAA Ref NEW047C).</p> <p>The Council's Site Selection Background Paper (page 41) for this parcel within the wider HSA4 allocation of the Site Allocations Local Plan notes that the 71 dwellings permitted on this area were not started. This supposedly reflects the Council's contact with the site promoter in summer 2020 as per paragraph 9.3 of the Background Paper. However, the Council's published assessment of Housing Land Supply for 1st April 2019 (issued in January 2020) is clear (page 5 of appendix 1), that construction on the parcel with permission for 71 dwellings was underway with 10 of the dwellings already completed. The extent of construction on the site is further illustrated in the aerial photo from July 2020 (obtained from Google Earth). <i>[See attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED']</i></p> <p>This is an illustration of where the authority has unjustifiably contended that development has not started whereas some where completed by 31st March 2019 with further units finished in the April 2019 to March 2020 period. This site should therefore have been omitted as an allocation within the emerging Local Plan and the resulting reduction in dwellings should be addressed through further allocations.</p>	

Respondent (with lpr ref)	Response	Council Response
<p>Pegasus Planning Group Ltd for Calcot Park Golf Club (lpr2327)</p>	<p>This policy states that at least 575 dwellings per annum (9,775 dwellings in total) will be provided from April 2020 to March 2037. It states that the target figure of 575 dwellings per annum does not constitute a ceiling or cap to development. New homes will be located according to policies SP1, SP3 and DC1. It is important for the council to ensure that the reference to the housing target figure not being a “ceiling or cap to development” is retained in the policy. This is because, this is a positive message to send out, whilst there is a nationally recognised shortage of housing in the UK and any policy that seeks to facilitate additional housing provision at this time is to be encouraged.</p> <p>The policy states that new housing will be focused in and adjoining the larger settlements, including the three growth areas, of which the Eastern Area is relevant to CPGC. Therefore, a development of up to 70 dwellings on land at CPGC, on the eastern edge of Calcot, will comply with policies SP1 and SP3, which will enable housing to be provided to meet the council’s housing requirements, as set out in policy SP12. The proposed 70 dwellings will make a valuable contribution to the housing needs of the district (potentially including affordable housing, depending on agreed development quantum and subject to viability). The allocation of land at CPGC within the built-up area of Calcot will comply with this policy, by helping to provide much needed new housing in a sustainable location, where the impacts of development can be satisfactorily mitigated.</p> <p><i>Policy SP12 – Approach to Housing Delivery is supported. However, it is considered that the text should not be amended to remove reference to the delivery of housing over and above the “target figure” of 575 dwellings per annum.</i></p> <p><b>Table 2 Housing Supply at March 2020 (in Policy SP12 referenced)</b></p>	<p>Support for approach noted.</p> <p>See response to representation on SP14 (lpr2328) regarding promoted site. The site is within the settlement boundary and any application would be determined according to the policies in the Local Plan. Should an application here be approved it would be additional windfall supply and contribute to the flexibility in the numbers. The Council does not propose to allocate within settlement boundaries other than for more strategic sites (the Kennet Centre in Newbury is the only proposed allocation within a settlement boundary).</p> <p>The Council’s strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites that can deliver housing sooner.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Paragraph 6.12 states that the requirement of 9,775 dwellings minus the supply of 8,114, means that sites for a further 1,661 homes need to be found. In addition, there needs to be some built-in flexibility to allow for phasing issues and to allow for non-delivery, particularly of larger sites, which need a great deal of up-front investment in roads and other infrastructure. Therefore, it is important to make it clear that the current shortfall of 1,661 dwellings should be a <u>minimum</u> and not a ceiling or a cap to development, as required by policy SP12 (see above).</p> <p>It is likely that larger sites will have some problems with delivery. It is unlikely that they will deliver the housing numbers predicted in the suggested timescales, because all larger sites encounter issues with such matters as site assembly, ownership and title issues, capital funding, infrastructure costs and delivery, planning permissions and legal undertakings, such as section 38, 106 and 278 agreements. Some larger sites, such as North-East Thatcham, are also the subject of vehement objections from residents and may not actually come forward in the local plan. Overall, it should be expected that the larger sites will not deliver the housing numbers needed in a timely fashion and there is a real need for more medium-sized and smaller sites, of less than 100 dwellings, to help to fill the gaps. Smaller sites can be delivered in short time frames, as they do not have the depth of issues that the larger sites have. Therefore, the council should allocate more smaller sites to ensure that housing needs are met in the short to medium-term.</p>	
Gerald Eve LLP for Fairhurst Estate (lpr2368)	<p>Our client owns and controls land situated to the East of Shaw Farm Road, Newbury. A site location plan of this land is included at Annex 1 (<i>attached to online representation</i>). The land would be accessed from the roundabout adjacent to the Vodafone Headquarters as an extension to the already permitted housing development, and would not rely upon vehicular access from Shaw Farm Road/Love Lane itself.</p> <p>We share the concerns of others in respect of the approach to the identification and allocation of sites for development. In particular the heavy</p>	<p>See response to lpr2371 on SP13 regarding site to the East of Shaw Farm Road.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites,. Strategic sites in Newbury and Thatcham are expected to deliver in the medium to long</p>

Respondent (with lpr ref)	Response	Council Response
	<p>reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandford Park and evidenced through background papers such as the 'Start to Finish' Report prepared by Lichfields).</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner.</p> <p>The Council's own assessment (within the HELAA (December 2020) of the wider area, within which the land is situated, stated that it is well related to Newbury and that it should be considered as part of a future potential strategic site (site reference SCD4). The Council has accepted the principle that the general location is suitable for development and, in positively preparing the plan, should be considering the positive contribution that a flexible approach to additional housing in locations such as this can make to ensuring that the plan meets its objectives. This would align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Further consideration of the whole site assessed as SCD4 within the HELAA should be undertaken. The site, as shown within SCD4, and specifically including the area as identified on the enclosed plan, merits further investigation and consideration for inclusion as a suitable site for the delivery of additional new homes.</p>	<p>term, while the smaller allocations and existing permissions will deliver throughout the plan period. A trajectory will be prepared to accompany the Reg.19 consultation and will be reviewed annually and reported in the AMR.</p> <p>It is not considered that a criteria-based policy for sites on the edges of sustainable settlements would be appropriate. The plan will be subject to five yearly review and annual monitoring will indicate if policy changes are needed.</p>
<p>Armstrong Rigg Planning for Manor Oak Homes (lpr2421)</p>	<p><i>Full representation promoting development of Land at Fairview, Greenways, Lambourn is attached.</i></p>	<p>The minimum requirement as set out in the LPR is for 513 dwellings per annum (dpa), slightly above the LHN. The target figure, which the Council is planning to meet is 538 dpa.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Manor Oak Homes object to Policy SP12 for 3 reasons:</p> <p><b>1. It fails to set a clear housing requirement for the plan period:</b></p> <p>NPPF paragraph 65 requires strategic policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. <b>Policy SP 12</b> fails in this regard primarily due to a lack of clarity. The policy refers to both a range of 520-575 dwellings per annum (dpa) being required and to a target figure of 575 dwellings, but it is unclear whether the proposed housing requirement is 520 dpa, 575 dpa or somewhere in between.</p> <p>The supporting text suggests that the Council intends its housing requirement to be 520 dpa and that the 575 dpa figure is intended as a supply buffer. If this is the case it needs setting out clearly to ensure that the Local Plan sets a specific housing requirement for the purposes of monitoring delivery and assessing its 5 year supply position. We would also raise concern that this represents an insufficient supply buffer. In our experience, Council's that apply a 20% supply buffer are more successful in maintaining delivery and achieving a 5 year supply of housing for the lifetime of the plan.</p> <p><b>2. It fails to take into account the unmet needs of Reading in reaching its housing requirement:</b></p> <p>The NPPF at paragraph 60 sets out that to determine the minimum number of homes needed, strategic policies should take into account any needs that cannot be met within neighbouring authority areas. In response to this requirement, the supporting text to <b>Policy SP 12</b> simply states that there has been no request to take unmet need from other authorities and the "<i>In 2018 there was a possibility of some unmet need in Reading Borough, but this is no longer the case</i>". We recognise that this statement was correct at the</p>	<p>For the purpose of monitoring the 5 year supply position, the PPG is clear that, if using a range, the requirement should be based on the lower end of the range.</p> <p>The use of a range for the requirement introduces some flexibility and there is also flexibility on the supply side, with the projected supply slightly exceeding the target requirement and with the use of a relatively modest windfall allowance.</p> <p>See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.</p> <p>The Local Development Scheme published in June 2022 anticipates adoption of the LPR in September 2024. The LPR therefore covers a 15 year period through to 2039.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>time the emerging LPR was published for consultation, but there has been a significant change in circumstances since the consultation started that must now be accounted for.</p> <p>In December 2020, the government published its new standard method for calculating Local Housing Need (LHN) which introduces a 35% uplift to LHN for the 20 largest cities and urban areas (including Reading). The new standard method increases Reading's LHN from 649 to 876 dpa in the context of a recently adopted Local Plan in Reading that already fails to meet its housing requirement. The Reading Borough Local Plan was adopted in November 2019 and its Policy H1 identifies a shortfall in delivery of 230 dwellings between 2013 and 2036 against a housing requirement of 15,847 dwellings (or 689 dpa). This housing requirement is 187 dpa lower than the new standard method which demonstrates that there will be a significant unmet need in Reading of c.3,000 dwellings<sup>1</sup> during the emerging LPR plan period. Given the recent adoption of the Reading Local Plan there is a risk that this unmet need will not be formally identified until preparation begin in earnest for a review of the Reading Local Plan. Such a review is required by the NPPF to be completed within 5 years and it is therefore expected that Reading will commence this work prior to the adoption of the West Berkshire Local Plan. In order to provide maximum flexibility at this stage of the plan making process we would therefore recommend that West Berkshire increase their supply buffer to 20% (as set out above). This will ensure sufficient flexibility in supply to account for any unmet needs from Reading.</p> <p><b>3. Failure to Plan for 15 Years from Adoption:</b></p> <p>NPPF Paragraph 22 requires strategic policies to look ahead over a minimum 15 year period from adoption. The supporting text to <b>Policy SP 12</b> states that: "<i>As the estimated adoption date of this Local Plan Review is 2022, the plan period has been extended to 2037</i>". This estimated adoption date is based on the Council's most recent Local Development Scheme (LDS) which was published in April 2020 and forecasts the publication of a Regulation 19 Proposed Submission Local Plan in May 2021 and adoption in</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>December 2022. Timescales have clearly slipped since the publication of the LDS, such that reaching Regulation 19 stage in May 2021 seems highly unrealistic. It is therefore unlikely that the Local Plan will be adopted in 2022 and there will be a requirement to plan for an additional year to 2038.</p> <p>The policy should be revised to specifically state what the Council's annual housing requirement is for the plan period is and then to separately set out what the intended supply buffer is over and above this housing requirement. We recommend that a supply buffer of 20% is used to ensure the delivery of the housing requirement. The housing requirement will also need reviewing in discussion with Reading Borough Council to take account of their significant unmet need and the plan period will need extending 2038 to ensure a 15 year period on adoption.</p>	
Turley for Richborough Estates Ltd (lpr2385)	<p><i>Full Representation promoting allocation of land north of Silchester Road, Tadley is attached at Policy SP14</i></p> <p>The provision for additional homes within West Berkshire for the period 1st April 2020 to 31st March 2037 is supported, however, the provision of housing should be listed as a <u>minimum</u> of 9,775 net additional homes, rather than providing a range. The provision of a minimum should also be reflected in the dwellings per annum, i.e. providing at least 575 dwellings per annum. This provides a clearer housing provision target.</p> <p>In order to provide flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner.</p>	<p>See response to lpr2390 on SP14 regarding the promoted site north of Silchester Road, Tadley.</p> <p>The 538 dpa figure is intended as a target but the minimum housing requirement is 2022 LHN (which is 513 dpa).</p> <p>It is not considered that a criteria-based policy for sites on the edges of sustainable settlements would be appropriate. The plan will be subject to five yearly review and annual monitoring will indicate if policy changes are needed.</p>

Respondent (with lpr ref)	Response	Council Response
Barton Willmore for Sulham Estate (lpr2439)	<p>We do not agree with the proposed policy on the basis that the housing target is insufficient.</p> <p>Please refer to the Housing Need Technical Note prepared by Barton Willmore, dated February 2021 submitted with these representations for our full response in relation to SP12. A brief summary follows but this should be read in the context of the full Technical note.</p> <p>The Council’s target figure does not incorporate sufficient uplift to meet the “substantial” affordable housing need of 319 dwellings per annum identified within the West Berkshire District Updated Housing Needs Evidence, May 2020 (Paragraph 9.7, page 80). Whilst it is acknowledged that the Council are not required to meet this need in full, the PPG states that “an increase in total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes” (Reference ID: 2a-024-20190220). The Council should uplift their housing target through the allocation of additional sites in order to deliver additional affordable homes. Failure to do so will result in an increased year-on-year deficit in terms of the number of affordable homes provided across the district over the plan period.</p> <p>In addition to the affordable housing need, West Berkshire should also be increasing their housing target in order to seek to meet a proportion of Reading Borough Council’s unmet housing need. Against the standard method minimum, Reading’s unmet need equates to over 4,000 dwellings over the recently adopted Reading Local Plan period. Reading is a highly constrained local authority and, given that the Eastern Urban Area of West Berks is contiguous with the west of Reading, West Berkshire should seek to meet some of this need in this area.</p> <p>Our client’s site at Hall Place Farm (reference TIL18 within the West Berkshire Housing and Economic Land Availability Assessment (‘HELAA’)</p>	<p>See response to Barton Willmore for Donfield Homes (lpr2098) regarding consideration of affordability issues and the assessment of need.</p> <p>See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.</p> <p>See response to the consultee’s representation lpr2441 on SP14 regarding promoted site at Hall Place Farm.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>(February 2020) directly adjoins the Eastern Urban Area and, therefore, has a functional relationship with Reading and is exceptionally well-placed to contribute towards meeting Reading's unmet need.</p> <p>The Council should increase their housing target and allocate further sites for development including our client's site at Our client's site at Hall Place Farm (reference TIL18 within the West Berkshire Housing and Economic Land Availability Assessment ('HELAA') (February 2020).</p>	
Turley for Pangbourne college (lpr2350)	<p>Emerging Policy SP12 (Approach to Housing Delivery) identifies the Council's plans to provide '8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development', which is welcomed and considered appropriate to ensure that the Council allows itself sufficient flexibility to maintain a 5 year housing land supply position.</p> <p>The Framework states 'Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services'. The lack of any proposed housing in Pangbourne, despite its position within the settlement hierarchy will limit the opportunities for the village to 'grow and thrive', contrary to national planning guidance and misses an opportunity to provide housing within an identified rural service centre.</p>	<p>Support for approach noted.</p> <p>There is a lack of suitable sites adjoining Pangbourne; those that have been promoted have been assessed in the HELAA. There may be opportunities for brownfield development and the strategy is to direct development to the more sustainable settlements, in particular to opportunities within the settlement boundaries.</p>
Barton Willmore for Donnington Valley Group (lpr2434)	<p>We do not agree with the proposed policy on the basis that the housing target is insufficient.</p> <p>The Council's target figure does not incorporate sufficient uplift to meet the "substantial" affordable housing need of 319 dwellings per annum identified within the West Berkshire District Updated Housing Needs Evidence, May 2020 (Paragraph 9.7, page 80). Whilst it is acknowledged that the Council are not required to meet this need in full, the PPG states that "an increase in total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes" (Reference ID:</p>	<p>See response to Barton Willmore for Donfield Homes (lpr2098) regarding consideration of affordability issues and the assessment of need.</p> <p>See response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2a-024-20190220). The Council should uplift their housing target through the allocation of additional sites in order to deliver additional affordable homes. Failure to do so will result in an increased year-on-year deficit in terms of the number of affordable homes provided across the district over the plan period.</p> <p>In addition to the affordable housing need, West Berkshire should also be increasing their housing target in order to seek to meet a proportion of Reading Borough Council's unmet housing need. Against the standard method minimum, Reading's unmet need equates to over 4,000 dwellings over and above the recently adopted Reading Local Plan (Nov 2019) figure. Reading is a highly constrained local authority and, given the strong physical and operational connections between Reading and West Berks, West Berkshire should seek to take a significant proportion of this unmet need. Our client's site at Donnington Valley Golf Course could accommodate housing development which would help the Council to meet an increased housing target.</p> <p>The Council should increase their housing target and allocate further sites for development across the district.</p>	
Rectory Homes Ltd	<p>Policy SP12 sets out the Council's approach to the delivery of housing over the emerging Plan period. The policy sets out that 520-575 dwellings per annum should be delivered between the years 2020 – 2037. We agree with the Council that the figure of 575 dpa should not be considered a maximum or cap to development and that further sustainable development that accords with the development plan and the NPPF should be delivered even if the figure of 575 per annum is exceeded.</p> <p>Paragraph 68 of the NPPF states local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no</p>	<p>Support for approach noted.</p> <p>A Housing Background Paper will accompany the Reg. 19 consultation and will set out how the housing supply meets the NPPF requirement regarding identifying sites under 1 hectare.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>larger than a hectare in size. This process should be conducted through the development plan.</p> <p>As a SME, the ability to secure the planning permission of and deliver schemes on small sites is crucial to the success and sustainability of our business. Due to their scale and low infrastructure costs, such sites can be delivered quickly to assist the Council's housing land supply position and can deliver tangible benefits to local communities, such as enhancing and maintaining the vitality of local services and facilities in accordance with Paragraph 78 of the NPPF. This is why the Government now requires local authorities to allocate more sites of varying sizes and it is critical that the Council supports this objective.</p> <p>Currently, the Council have not demonstrated that at least 10% of their housing requirement. This will need to be reflected in the forthcoming versions of the emerging Local Plan.</p>	
Origin 3 for Sandtrend Ltd (lpr2398)	<p>For Newbury and Thatcham the Plan considers these urban areas positively as locations to deliver growth.</p> <p>The spatial strategy maintains its approach delivering sites against a settlement hierarchy – with the LPR explicit that Newbury, as part of the Newbury and Thatcham urban area, is a sustainable location for development. For Newbury, the LPR's Vision seeks to maintain its market town heritage.</p> <p>The West of Berkshire Spatial Framework Plan (SFP), December 2016 (prepared by the authorities of West Berkshire, Bracknell Forest, Reading and Wokingham) set out the basis against which the four authorities would work in demonstrating strategic priorities and projects. It would have informed the earlier (2018) LPR consultation. This earlier consultation identified areas of search within West Berkshire for delivering planned growth: (i) 'Land north of Newbury within the M4 corridor; and (ii) at Grazeley</p>	<p>Since the West of Berkshire Spatial Framework Plan was published, further work was carried out on assessment of sites, including through the HELAA and the SA/SEA. The reasons why further development to the north of Newbury are outlined in the site assessment work.</p> <p>Though Grazeley had been identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield.</p> <p>The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town</p>

Respondent (with lpr ref)	Response	Council Response
	<p>in east of the district (south of Reading). In respect of (i) it presented a significant area of search to the north of Newbury - extending northwards along the A339 and A34 towards the M4. In being prepared to support the collaborative working of the authorities and to meet housing market area needs, the SFP initiative was welcomed by our client as a positive approach to identifying growth options focused to the north of Newbury. This was reflected in our client's submissions to the LPR Consultation, March 2018 in which we identified and supported the principle of the West Berkshire Core Strategy's (2012) spatial strategy – in directing growth towards key urban areas in being the most sustainable locations for new housing.</p> <p>However, the outputs of this SFP work do not appear to be evidenced in the work informing the current LPR consultation. There seems little point in committing to such an exercise as a joint initiative between four neighbouring authorities and not clearly referencing the outcome of the work nor responding to it in preparing the emerging LPR. Indeed, the exercise by the authorities was to identify needs within the authorities and, through collaboration, "<i>shape the approach to early delivery of key infrastructure and help secure investment in the area</i>".</p> <p><b>iii. Suggested Strategic Growth to the North of Newbury</b></p> <p>The spatial strategy recognises the need for development growth to meet the district's needs with Newbury (and Thatcham) fundamental in accommodating growth. Whilst brownfield development sites will inevitably be available, other development areas that respond positively to opportunities and can draw from existing and established infrastructure should also be deliverable.</p> <p>A strategic area of search with readily identifiable development areas is situated to the west of the B4494 at Donnington and north of Grove Road/Lambourn Road. This wide area sits in an advantageous strategic location proximate to the A339 with ready access to the M4 and into Newbury. Well planned, sensitively sited development can be</p>	<p>proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation.</p> <p>See response to the consultee's representation lpr2400 on SP13 regarding promoted site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>accommodated in this strategic area. It can respond to local sensitivities including the proximity of designated heritage and other assets and features ensuring that place-making principles are adopted and the wider connectivity benefits are the basis of a masterplan.</p> <p>This area, for further consideration by the Council, aligns fully with the area of search endorsed in the aforementioned SFP. Indeed, it presents an opportunity for development parcels to be identified, considered and allocated. In the context of the surrounding area, there would be a number of development parcels – readily developable for housing and capable of delivering development promptly.</p>	
Bluestone Planning for Darcliffe Homes Ltd (lpr2427)	<p>Darcliffe Homes Ltd (hereafter 'Darcliffe') support the principle stated in policy SP1 Spatial Strategy of identifying the locations as set out in the settlement hierarchy in policy SP3 where residential development may take place. This is consistent with the guidance on the general approach to the delivery of new homes, as set out in the NPPF.</p> <p>The densities as set out in the policy are generally supported, although it should also be noted that higher density may also be achievable in certain locations, particularly around the Eastern Area. Careful and sensitive design can deliver higher density, without leading to unacceptable intensification.</p> <p>The policy also refers to the significant commitments throughout the District and as explained below, there are concerns that these either may not come forward during the Plan period and/ or are being built out at a rate which would mean that they are not appropriate for inclusion in the Adopted Plan and therefore alternatives will have to be sought.</p> <p>Policy SP3 sets out the settlement hierarchy and identifies the urban areas which will be a prime focus for housing. It is supported that the Eastern Urban Area will be a focus, although there is a significant imbalance</p>	<p>See response to consultee's representation lpr2425 on SP1.</p> <p>Newbury and Thatcham are the largest settlements in the district and it is appropriate that the focus for development should be here. The Eastern Area is very constrained, with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston. Sites promoted have been assessed through the HELAA and site selection process.</p> <p>The Tilehurst Neighbourhood Development Plan Steering Group have responded to the consultation and stated that they do not now intend to allocate sites for development.</p> <p>As part of the work on proposed submission (Regulation 19) version of the LPR, sites in Tilehurst have been considered for allocation through SA/SEA and more detailed site selection work. Site TIL13 (Land at Pincents</p>



Respondent (with lpr ref)	Response	Council Response
	<p>between the numbers allocated to Newbury and Thatcham when compared to Eastern Area, with over 4,000 homes to the former and under 1,000 homes to the latter. This is not considered appropriate given the level of services and facilities provided to the Eastern Area.</p> <p>With regard to the Eastern Area specifically, it is stated that new allocations for Tilehurst and Burghfield will be made through NDPs. This is clearly dependent on the NDP process, which is lengthy and sometimes fraught with difficulties.</p> <p>At the time of writing, Tilehurst for example have not yet published their draft Neighbourhood Plan and therefore it will still be some time before this can be taken to and approved at referendum, and housing can start to be delivered in accordance with such allocations. Although Policy SP14 sets out that the Designated Neighbourhood Area should allocate 175 dwellings, there is no timeframe for when this may come forward or whether this number will be agreed.</p> <p>It should also be noted that in the HELAA the text regarding Tilehurst makes it clear that allocations will be made within the Local Plan Review where not allocated by the NDP.</p> <p><i>“Tilehurst</i></p> <p><i>8.31. Tilehurst Parish is designated as a Neighbourhood Area, and Tilehurst Parish Council are preparing a neighbourhood plan. The Parish Council have expressed an intention to include residential allocation(s) in the neighbourhood plan. The site selection work will therefore be undertaken by the Parish Council.</i></p> <p><i>8.32. In the event that Tilehurst Parish Council choose not to include residential site allocations in the neighbourhood plan, then West Berkshire</i></p>	<p>Lane, Tilehurst) was recommended by officers as being suitable for allocation. However, the Member decision was that the site should not be proposed for allocation due to the impact that development would have on the local highway network.</p> <p>Regarding the supply calculations, there is no undersupply carried forward from the Core Strategy. National guidance is clear that this is factored into the standard method.</p> <p>SP13 proposes the allocation of up to 1,500 homes at Sandford Park.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites that can deliver housing sooner. The Council is not relying on the total allocation at either Sandford Park or North East Thatcham to meet the need up to 2039.</p> <p>Any completions on the sites allocated in the HSA DPD before April 2022 have not been included in the supply set out in Table 2.</p> <p>The small site windfall allowance included is 140 units per annum. It is not applied across the whole plan period as that would involve double-counting with existing permissions. Permissions on small sites are already included in the supply, within the first five years, so the windfall allowance is only included later in the five year supply and beyond.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>Council will pick up the site selection work and consider allocations through the LPR.”</i></p> <p>All other locations are to be treated as open countryside (as set out in Policy SP1) and therefore no sites in these areas could be brought forward in accordance with policy. It is therefore considered that housing allocations should also be made either independently or collaboratively in the Review Local Plan or the policy should be more flexibly worded in the urban areas.</p> <p>There is a concern that policies do not go far enough in bringing forward small and medium sized sites, particularly those located on the edge of the identified urban area settlements. As stated above, if such sites are not allocated in the Local Plan Review or in particular, a NDP, because an NDP has either not been developed or has been delayed, there is no mechanism for such sites to be approved in the future. This may be an issue of great concern where some of the larger strategic sites are not deliverable within the Plan period.</p> <p>It is also unclear from the supply calculations whether or not there has been an undersupply from the Core Strategy 2012 which has been carried forward. Sandford Park was allocated in the 2012 Core Strategy and has not yet been granted permission. Clarification is sought as to how this has been dealt with and whether further sites should be allocated in this regard.</p> <p>The table in Policy SP13 also sets out that Sandford Park seeks to accommodate up to 1500 dwellings, whereas the text in paragraph 6.12 states that only 1,000 houses will be delivered by 2037 and the remainder in the following Plan period.</p> <p>This approach is also inconsistent with the encouragement of developers to bring forward small and medium sized sites. The HBF document (2017) ‘Reversing the decline of small housebuilders:</p>	<p>See response to the consultee’s representation lpr2429 on SP14 regarding promoted sites.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Reinvigorating entrepreneurialism and building more homes' notes (p.29) that:</p> <p><i>“For understandable political and financial reasons, planning authorities have increasingly sought to allocate very large strategic sites for residential development in order to satisfy its requirement to demonstrate a five-year land supply. Large sites on the edge of settlements can be less likely to spark political controversy as they are slightly removed from existing communities. For the very same reason, however, they may require substantial infrastructure and up-front financing resulting in relatively lower delivery rates in the early years of the site’s existence making rapid delivery unrealistic.”</i></p> <p>The latest research from Lichfields (February 2020) ‘Start to Finish What factors affect the build-out rates of large-scale housing sites? Second edition’ discusses the lead times on large sites and the data is not encouraging:</p> <ul style="list-style-type: none"> <li>• Schemes of 500-999 dwellings take on average approximately 5.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 1,000-1,999 dwellings take on average between 6.9 and 7.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 2,000+ dwellings take on average approximately 8.4 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years. 6.1 years of this are taken up with the planning application process. (see figure 4 of the Lichfields document)</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<p>In contrast, smaller sites between 0 and 99 dwellings typically deliver within 3.3 years of the validation of the first application.</p> <p>On this basis it is considered that the following should be taken into consideration:</p> <ul style="list-style-type: none"> <li>• SP16 Sandleford Park is allocated for 1,000-1,500 dwellings, taking the above into account, it would take between 6.9 – 7.0 years until the first dwelling is built based on the above assumptions. It should be noted however that the site has been allocated since 2012 and although a number of applications have been submitted, there remains outstanding issues and the site still does not have permission. It is therefore considered that given the length of time taken to date, that the site is unlikely to realistically deliver the numbers proposed.</li> <li>• SP17 North East Thatcham is allocated for 2,500 dwellings, taking the above into account, it would take 8.4 years from validation until the first dwelling is built, based on the above assumptions. There has been no application to date. It is unlikely therefore that any dwelling would be built until approximately 2030 and following this, the average annual build-out rate for a scheme of 2,000+ dwellings is an average of 160 dpa (as set out in the aforementioned Lichfields report). On this basis, with the Plan period up to 2037, this would equate to 1,120 dwellings during the Plan period and not 2,500 as set out. It is unrealistic that on an allocation of this size that dwellings could be brought forward to the market at a faster rate.</li> </ul> <p>The HBF document goes on to advise that (p.29-39):</p> <p><i>“Once allocated, LPAs are systematically failing to assess on an ongoing or regular basis, the actual delivery achieved against the targets indicated in its</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>local plan. For instance, by allocating one or several very large sites to achieve a five-year supply of land, delays progressing one site through planning will have a substantial impact on the ability of the authority to adequately plan for the number of homes required.....</i></p> <p><i>..... To meet demand for housing, we need more sites of all sizes allocated. Indeed, large sites often deliver new homes at astounding rates, particularly in areas where the market is strong, but small sites are consistently efficient in their delivery. For this reason, the allocation of a wider range of sites within local plan allocations would not only help increase plurality in the housebuilding sector, it would also improve the chances of local authorities' meeting ambitious supply trajectory plans. Achieving this all-round positive outcome need not involve overly prescriptive diktats. A subtle shift in policy emphasis, along with a greater focus on ongoing delivery within a local plan period would help to achieve a positive change in behaviours at a local level.....</i></p> <p>The above is also irrespective of the fact that many of the smaller HSA sites are already near completion and at least some the numbers should have potentially been counted before the Plan period. Therefore, these numbers are unlikely to be taken forward in the Adopted Local Plan.</p> <p>In addition, based on last published WBC housing monitoring report (2019), there was a projected windfall allowance of 362 dwellings for the five years up to 2024. To cover the Local Plan Review period to 2037 would suggest a windfall figure of 1,231 dwellings should be included in the supply and not 1979 as currently stated in Table 2 Housing Supply at March 2020. Therefore, there is real danger that the delivery target will not be met due to a reliance on windfalls. This makes very clear that when combined with a lack of flexibility / unclear non-implementation allowance, that there is a need for more allocation sites to bridge the shortfall, in the order at least 700 units.</p> <p>In summary, there is a clear under provision for new sites and further small to medium sites should be considered with flexibility to allow sites on the</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>edge of the urban areas identified to come forward to ensure that sufficient sites can be delivered within the Plan period.</p> <p>It is considered that policies SP1 and SP3 should be reworded to provide more flexibility.</p> <p>Other nearby Local Planning Authorities have recognised the issue that can arise where a NDP is not delivered. For example, South Oxfordshire District Council in their Policy H1 of the recently adopted Local Plan (but see also their Core Strategy which also contained a similar policy) set out that:</p> <p><i>“Where Neighbourhood Development Plans are not progressed in larger villages and market towns, planning applications will be considered against the housing delivery targets for the towns and larger villages set out in this Plan.”</i></p> <p>A form of words reflecting the above, would ensure that there would be sufficient flexibility to take into account any NDP problems and Policy SP1 should be amended accordingly, with and SP3 and DC1 given clarification in this regard.</p> <p>To reflect this and the potential undersupply of housing, further small to medium sites should be also be added to policies SP13-14, with any update to SP12 as a result. Darcliffe Homes are proposing two such sites within the Eastern Urban Area, which would deliver up to 80 dwellings.</p> <p>The supporting text at paragraph 6.22 would also need to be updated in this regard.</p> <p>The addition of further small to medium sites such as these will require a re-consideration of the capacity of the strategic-scale sites to reflect realistic expectations. Revising the site capacities slightly downward to accommodate a shift of dwelling numbers will not however adversely affect the ability of the promoters to bring the strategic sites forward for</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>development, but will allow a longer period for developing out the entirety of the site, which is likely to run into the following Plan period.</p> <p>Allocating additional small to medium sites will also have a positive effect on the smaller scale and local housebuilding industry, which includes Darcliffe Homes, in providing opportunities that will help to continue to sustain this important re-emerging sector of the housebuilding industry.</p>	
Barton Willmore for Wilson Enterprise Ltd & Hallam Land Management (lpr2455)	<p><i>Extract from representation relating to approach to Grazeley</i></p> <p>In addition to preparing to fully meet its own needs, West Berkshire must also factor in unmet need from adjacent/nearby areas, including:</p> <p><u>West of Berkshire authorities:</u></p> <p>The Memorandum of Understanding (MoU) between the Berkshire Local Authorities (July 2018) includes West Berkshire within the Western Berkshire Housing Market Area along with Bracknell Forest Borough Council, Reading Borough Council and Wokingham Borough Council. Paragraph 4.2 of the MoU states that the “<i>Berkshire Authorities will use their best endeavours to ensure that the full objectively assessed need for housing...</i>” is met.</p> <p>Under the MoU, the four authorities undertook a great deal of joint work. One of the key pieces of work was the West of Berkshire Spatial Planning Framework, which identified Grazeley on the boundary of Wokingham and West Berkshire as being able to accommodate 15,000 homes, together with supporting infrastructure and facilities.</p> <p>The Reading Local Plan was adopted in November 2019. It reflected the MoU and joint work undertaken with the other Western Berkshire authorities. Paragraph 10.1.12 of the Local Plan states, “In particular, Reading Borough</p>	Please see response to Reading Borough Council (lpr1488) regarding unmet need in the wider area. A Duty to Co-operate statement will be published alongside the Reg. 19 consultation.

Respondent (with lpr ref)	Response	Council Response
	<p>Council is working with its neighbours in examining how growth can take place within the Western Berkshire Housing Market Area, in particular in view of the expectation that Reading's unmet housing need will be accommodated within the rest of the HMA. <b>The publication of the West of Berkshire Spatial Planning Framework is an important starting point and context for this plan</b>, but this joint work will continue into the future". (Author's emphasis).</p> <p>Although the Reading Local Plan sought to accommodate the vast majority of its own housing need, there was unmet need that needed to be allocated elsewhere in the HMA, and a significant requirement for family housing which cannot be provided within Reading's boundary given its urban nature and tightly drawn boundaries. Further, the latest Government Standard Methodology, published in December 2020, shows Reading's housing requirement increasing to 876 dwellings per annum, an increase of 35% from the adopted local plan figure. That future requirement is highly unlikely to be met in full within Reading Borough and will create an unmet need that will need to be accommodated under the Duty to Cooperate or as part of future joint working by the neighbouring authorities.</p> <p>It is quite clear from the West of Berkshire Spatial Planning Framework that the study area has significant physical constraints (Green Belt, Area of Outstanding Natural Beauty, Special Areas of Conservation, Special Protection areas, flood areas) yet has very good connections with London and the surrounding area, making it a very desirable place to live, which in turn makes affordability an issue. The identification of a new settlement of Grazeley will ensure an appropriate number of new homes will be developed in the right place to serve existing and future residents.</p> <p>This draft Local Plan and its housing target, however, seem to have stepped back from the HMA work and is 'inward looking'. We suggest that greater clarity is needed to quantify the unmet needs of surrounding boroughs within the Housing Market Area (HMA) with clear direction as to how and</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>where these unmet needs can be appropriately accommodated, because if not at Grazeley, where?</p> <p><u>London</u></p> <p>The London Plan Examination recognised the London Plan’s inability to meet its own needs and highlighted its dependence on the wider region to accommodate the unmet need. Even with the latest (likely to be adopted) London Plan housing target of 52,000 dwellings per annum there will be an annual shortfall of 14,000 homes per year. However, using the Government’s proposed Standard Methodology this figure could be as high as 60,000 homes per year.</p> <p>Given the importance to the protection of the Metropolitan Green Belt, the vast majority of the unmet need inevitably falls to those areas immediately beyond the Green Belt. This includes the housing market area of the West of Berkshire authorities, which in turn includes West Berkshire. The extent of this need has not been specifically quantified for this area, but that does not result in such needs disappearing. We consider that the emerging West Berkshire Local Plan should take account of any such unmet need and continue the work of the West of Berkshire Strategic Spatial Framework to accommodate a proportion of this need.</p> <p>The impact of the pandemic on the London housing market should also be considered, as the significant increase in people looking for homes outside the capital will only create more pressure in West Berkshire.</p> <p><u>Heathrow</u></p> <p>Despite recent events, the planned expansion of Heathrow airport is still a long-term ambition and an essential element to the future prosperity of the UK economy. The economic impact of this proposal is well documented.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Less well documented is the housing needs that will arise from the economic growth projected.</p> <p>However, despite its importance and very real impact on the wider area, including the West of Berkshire housing market areas, no reference appears to have been given to what this could mean for the emerging Local Plan.</p> <p>In this regard, it is worth highlighting the Interim Inspectors Findings for the Aylesbury Vale Local Plan (August 2018), where the Inspector raised particular concerns that there are many events and planning-related issues occurring outside of the Local Plan area that would have an effect on how the Local Plan area was shaped in the future. In this context, it was the relationship of the Local Plan area to the Oxford-Cambridge growth arc and the planned Heathrow expansion, wherein he stated that “Predictable events should be planned for. Both Heathrow expansion and the Oxford-Cambridge expressway are predictable, known, events. Only the route of the latter is not yet fixed. To be sound, VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale” (paragraph 7).</p> <p>In a similar manner, it is essential that the West Berkshire Local Plan takes account of predictable and known events such as the London unmet need, planned infrastructure provision (Crossrail etc) and Heathrow expansion.</p> <p>This is why the cross-boundary working of the LPA’s in the West of Berkshire (for example to produce the West of Berkshire Spatial Planning Framework) is so important - to identify large scale opportunities meeting the identified future development needs in the area for the local plan and beyond; and plan for any cross-boundary implications. We believe that working collaboratively will help all authorities to meet their identified housing need and that of the wider area.</p> <p><b>Conclusion</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The West Berkshire Local Plan should be positively prepared and have a justified long- term strategy for the development needs of its district or the wider area, in collaboration with its neighbouring authorities.</p> <p>The Local Plan should reflect and continue the joint work undertaken over at least the last five years in the West of Berkshire Spatial Planning Framework and more recently.</p> <p>West Berkshire should be clear in the Local Plan about its approach to Grazeley, but whichever option is pursued, the Council needs to undertake the requisite evidential work to make the Local Plan sound.</p>	
Pro Vision for CALA Group Ltd (lpr2456)	<p><i>In context of two sites: East and West of Salisbury Road, Hungerford. Full representations attached</i></p> <p>The proposed spatial strategy makes policy decisions about how to apportion the development needs across the spatial areas. “Modest”, or more accurately, very modest, growth is proposed to be directed to the AONB area.</p> <p>Specifically within Hungerford, the main settlement of the AONB area, what does the evidence base say about local need?</p> <p><b>Affordable housing</b></p> <p>In terms of the published evidence base, noting that the Strategic Housing Market Assessment has not been updated since 2016, a key evidence document for the LPR is the Updated Housing Need Evidence (UHNE)9, which provides information on the need for affordable housing.</p> <p>This report does not appear to drill down to specific settlements, but does give useful information of need by spatial area.</p> <p>The UHNE identifies a need for 101 affordable homes per annum in the AONB spatial area. That equates to 1,515 affordable homes over the plan period.</p>	<p>See response to the consultee’s representation lpr2415 on SP1 Spatial Strategy.</p> <p>Though SP15 shows a total of 389 units proposed for allocation in the AONB spatial area through the LPR, Hungerford Neighbourhood Plan the total number in the supply is higher, as this includes existing commitments and an element of windfall allowance. The AONB is a nationally valued landscape and growth must be appropriate and sustainable, conserving and enhancing the special landscape qualities.</p> <p>Housing needs have not been assessed for specific settlements within the District. The spatial strategy sets out the approach to meeting the overall need in the District.</p> <p>With regard to Hungerford, the existing HSA DPD allocation is not being retained as the site is well under construction. Additional allocations in Hungerford will come forward through the Hungerford Neighbourhood Plan.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>This need is described as “substantial” and “the Council is justified in seeking to maximise the provision of affordable housing on eligible development sites, subject to viability”.</p> <p>Indeed, the report invites the Council to “consider through plan-making process whether higher housing provision would have positive benefits on affordable housing delivery”.</p> <p>Noting the proposed spatial strategy is for 500 homes in total (open market and affordable) across the spatial area, there is no prospect whatsoever of the need being met through this plan. The draft plan is planning to fall well short of meeting the need, especially in the AONB spatial area.</p> <p><b>Need in Hungerford</b></p> <p>There appears to be no published evidence behind the LPR on specific need for Hungerford.</p> <p>In summary therefore, there is likely to be capacity for more development in Hungerford than the proposed housing requirement, a requirement which falls well short of meeting local need. The proposal to constrain the amount of development in the AONB, and Hungerford in particular, is likely to have significant social and economic impacts. A more balanced approach to meeting the three strands of sustainable development is needed.</p> <p><b>Sustainability Appraisal</b></p> <p>The SA appraisal demonstrates that significantly boosting the supply to 692 dpa has the greatest impact on meeting the affordable housing need and is scored ‘significantly positive’.</p> <p>Nonetheless, it is noted that this level of growth may have negative effects on several environmental objectives. Overall, this option is scored ‘neutral’, with the other two options scoring ‘positively’. However, it is noted that the SA appraisal scores options ii and iii the same with regards to economic benefits (i.e. SA Objective 10), but clearly a significant increase in</p>	<p>Comments on the SA are noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>housing delivery more closely supports delivering this SA Objective. The Council should be concerned that limiting the housing supply to deliver the minimum requirement or with only a 10% buffer will significantly restrict the housing supply and therefore, amongst other issues, will further raise house prices to levels which create cost barriers to local residents and workers. As a result, not adequately addressing the affordability problems and lack of affordable housing across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered within the SA appraisal.</p> <p>it is considered that the SA, an important part of the evidence base that will require scrutiny at examination stage, currently fails to provide clear and credible reasons for selecting the 520-575 dpa as its preferred approach, and which does not support the Council's 'Vision' for the Local Plan to address affordability as a priority. Accordingly, the current approach within the LPR is unlikely to be justified and the plan would be vulnerable to be found unsound at examination</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham

### (Proposed Submission LPR Policy: SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham)

Number of responses received: 56

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Cold Ash Parish Council (lpr1738)	<p>The allocation of 40 houses for the Cold Ash Neighbourhood Area is out of keeping with the allocation that has been specified for other NDPs. Of the 8 NDPs, Cold Ash has a much higher allocation than more than half of the others. The only two that are higher are Hungerford (55, but a rural service centre, not a service village, so one would anticipate a higher number) and Tilehurst (175, but it is urban).</p> <p>We recognise Cold Ash village's designation as a service village, but in reality, we do not have many facilities in the village. Cold Ash village has a village shop/PO with car parking for four cars and a village hall. The hamlet of Ashmore Green has nothing except for a parish notice board and a salt bin. Moreover, our road network needs to be taken into account and seen for what it is – basically a network of adopted farm tracks, one unclassified main road, with very limited off- street car parking and pavements. Consider Lambourn, which is a service centre and has significantly more facilities and yet has only been allocated 25 dwellings; this is not fair or consistent with the settlement hierarchy and</p>	<p>The emerging draft West Berkshire Local Plan Review to 2037 (LPR), which was published for consultation in December 2020, included indicative housing requirements for the Neighbourhood Areas that were designated at the time and where a NDP group had expressed an intention to allocate. The indicative requirements are included within strategic policies SP13 (Sites allocated for residential and mixed-use development in Newbury and Thatcham), SP14 (Sites allocated for residential and mixed-use development in Eastern Area), and SP15 (Sites allocated for residential and mixed-use development in the North Wessex Downs Area of Outstanding Natural Beauty (AONB)).</p> <p>There is no set method identified in national planning policy and guidance for calculating the housing requirement, however national planning practice guidance (PPG) does state that local planning authorities will need to take into account their own housing requirement, the spatial strategy set out in the Local Plan, evidence such as the Housing and Economic Land Availability Assessment (HELAA), and the characteristics of the</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>appears to be another result of the skewing caused by the spatial strategy.</p> <p>So, to summarise, we are very concerned that our indicative requirement is double the number allocated to Hermitage (20) and Lambourn (25) parishes (which have more facilities than Cold Ash village), with the remaining three parishes actually receiving an allocation of zero. We are concerned that our allocation of 40 dwellings does not sufficiently take into account all the issues and pressures uniquely faced by our parish.</p>	<p>neighbourhood area, eg. population, its role in providing services. Past delivery performance is not taken into account.</p> <p>No further changes to Policy SP13 are proposed. The indicative requirements were based on available development opportunities identified in the Council’s February 2020 HELAA. The HELAA is an evidence document that makes a preliminary assessment of the suitability and potential of sites that have been promoted to West Berkshire Council.</p> <p>Consideration was also given to the placing of a settlement within the settlement hierarchy and constraints.</p> <p>The justification for Cold Ash’s requirement was set out in an email to the steering group dated 2 October 2020, and is included below:</p> <p><i>The Parish of Cold Ash contains the village of Cold Ash, the hamlet of Ashmore Green, and small parts of the towns of Newbury and Thatcham.</i></p> <p><i>Cold Ash village is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Ashmore Green is not included within the settlement hierarchy and is instead a ‘smaller village with a settlement boundaries’ therefore only suitable for limited infill development subject to the character and form of the settlement. Newbury and Thatcham are both identified as ‘Urban Areas’ because of the wide range of services they offer and subsequently both will be the focus for the majority of development.</i></p> <p><i>Cold Ash sits on the southern edge of the North Wessex Downs AONB. Much of the village is just outside of the boundary, however the houses to the north and east of The Ridge are within the boundary. The AONB is a nationally important and</i></p>

Respondent (with lpr ref)	Response	Council Response
		<p><i>legally protected landscape and the NPPF is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</i></p> <p><i>Within the HSA DPD [Housing Site Allocations Development Plan Document] there are 3 allocated sites in Cold Ash Parish for a total of between 90-100 dwellings. One site is being built out, however 2 have yet to come forward. Of the two outstanding sites, two have outline permission whilst the landowner of the third has expressed their intention for the site to be developed and they are in the process of appointing a planning consultant.</i></p> <p><i>The February 2020 HELAA identifies five sites as having potential. Taking the development potential of these sites into consideration alongside the placing of the towns/villages in Cold Ash parish within the settlement hierarchy, existing allocations, as well as the AONB, officers consider that a housing requirement of 40 dwellings would be appropriate.</i></p> <p><i>In respect of HELAA site CA15, the eastern site parcel falls within Cold Ash Parish and the western parcel within Shaw-Cum-Donnington Parish. The Council's Highways Team have identified that for this site as well as site SCD4, the provision of a through route from the B4000 to the A339 is required. This site along with SCD4 will only be supported by Highways if this is provided. Combined sites CA15 and SCD4 are of a strategic scale. It is for the local planning authority to plan for strategic sites.</i></p> <p>The information published in the HELAA was at a point in time. As work has progressed on the LPR and more evidence has been gathered, some of the development opportunities we originally identified have changed. Some Neighbourhood Development Plan (NDP) steering groups have therefore found they are unable to allocate the housing numbers they have been given, and are</p>



Respondent (with lpr ref)	Response	Council Response
		<p>looking to allocate sites in settlement boundaries instead, which is the case with Cold Ash.</p> <p>Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan does not include allocations within settlement boundaries because the principle of development is considered acceptable. Were NDPs in West Berkshire to include allocations within the settlement boundary, then this approach would be inconsistent with the approach taken in the Local Plan and draft emerging LPR.</p> <p>NDPs must meet a set of tests known as Basic Conditions, and one of these is that the policies in a NDP must be in general conformity with the strategic policies in a Local Plan.</p> <p>The site selection work undertaken by the Cold Ash NDP steering group has identified just one suitable site, and this site is located within the settlement boundary. In light of this, the housing requirement for Cold Ash Parish will be amended to zero.</p> <p>No further changes to Policy SP13 are proposed.</p>
Greenham Parish Council (lpr901)	<p>Object to policy.</p> <p>Delete RSA5 altogether as undeliverable.</p>	<p>Policy RSA5 (Land adjoining New Road, Newbury) is proposed to be removed as an allocation. This is due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant</p>

Respondent (with lpr ref)	Response	Council Response
		<p>pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the National Planning Policy Framework (NPPF) which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p> <p>Delete reference to RSA5 in Policy SP13. No further changes to Policy SP13 are proposed.</p>
Network Rail (lpr2296)	<p>Following my comments previously sent to the council in response to the West Berkshire Local Plan Review to 2036 on the 26<sup>th</sup> March 2018 regarding any future development and how it might impact the railway. We advised that the council should undertake viability testing for any proposed allocated site which it considers would have an impact on the railway infrastructure, so that any mitigation required would be provided for.</p> <p>In particular, but not necessarily exclusively we would be looking at any adversely impacted level crossings. I provided scenarios which we believe are susceptible to fall into this category, as shown below.</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of development added over time</li> <li>• By the type of crossing involved</li> <li>• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing</li> </ul>	<p>Support for the closure of the Thatcham level crossing noted.</p> <p>None of the sites proposed for allocation or their accesses are directly next to a level crossing.</p> <p>The representation mentions that several sites have been put forward for allocation in and around Thatcham Level Crossing. This is incorrect.</p> <p>Several sites in and around Thatcham Level Crossing were promoted as part of the 'call for sites' for the Council's HELAA. The HELAA is a technical assessment that makes a preliminary assessment of a sites suitability and potential. It does not make recommendations on which sites should be allocated. The allocation of sites will only take place through statutory plan processes (eg. Local Plan and Neighbourhood Plans) which undergo public consultation and independent examination.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• By developments that might impede pedestrians ability to hear approaching trains</li> <li>• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing.</li> </ul> <p>There have been several sites put forward for allocation in and around Thatcham Level Crossing. The Rainsford Farm and former Colthrop Paper Mill site in the Local Plan Review being put forward by Colthrop Village Consortium includes the provision of a bridge over the railway, so that Thatcham level crossing can be closed.</p> <p>We support the closure of Thatcham level crossing, therefore fully support any development that includes mitigation in the form a bridge</p>	<p>The sites in and around Thatcham Level Crossing were assessed in the HELAA as being 'not developable within the next 15 years' and therefore were not considered as part of the LPR site selection work.</p> <p>No further changes to Policy SP13 are proposed.</p>
Newbury Town Council (lpr2260)	<p><i>See attachment on objective for full response to the LPR.</i></p> <p>We do not support this policy. We comment separately on SP 16 &amp; 17.</p> <p><b>Reasons:</b> As stated above in SP 12, there appear to be inconsistencies in the selection of sites to include in the Plan. For the Newbury settlement area and a bit beyond, we list all sites in the draft Plan, the HELAA, the 2013 SHLAA and the HSA DPD in a separate document to be read with this response (<i>attached</i>).</p> <p>Changes sought:</p> <ul style="list-style-type: none"> <li>• Delete these sites and include them instead in "sites with planning consent and/or under construction" in the explanation of total housing numbers required in SP 12 supporting text: RSA2, RSA3, RSA4,</li> <li>• Delete RSA5 altogether as</li> </ul>	<p>The existing housing allocations in the Housing Site Allocations Development Plan Document (HSA DPD) have been rolled forward, but where the site is completed or where construction is underway, they will be excluded from the LPR (eg RSA6 will be amended to exclude that part that is now complete). All sites will also be reviewed to take account of any representations and/or additional information.</p> <p>Sites that have an extant planning permission are included in the supply. This includes both allocated and non-allocated sites.</p> <p>Allocation RSA5 (Land adjoining New Road, Newbury) is no longer proposed for allocation. This is due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the National Planning Policy Framework</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Add the following HELAA sites with appropriate RSA numbering, maps, and descriptive text:               <ol style="list-style-type: none"> <li>1. NEW02 land south of Phoenix Centre, Newtown Road – 24 dwellings</li> <li>2. NEW07 former Magistrates Court, Mill Lane – 13 dwellings</li> </ol> </li> <li>• Include NEW01 HELAA site housing numbers taken from promoter's Council approved Master Plan – minimum 258 We would like to see a higher figure of around 550, taking account of the consented development Faraday Plaza and without removing the DEA status of the site in this Plan but accepting that it can deliver both a major increase in employment and significant new housing.</li> </ul> <p>These changes taken together would go a considerable way towards meeting the overall housing need in the District. None of them should be considered 'windfall' sites because all have been promoted for housing and are shown in the HELAA as deliverable in this Plan period.</p>	<p>(NPPF) which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p> <p>Sites NEW1, NEW02, and NEW07 are not proposed for allocation as they are all located within the settlement boundary. Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan does not include allocations within settlement boundaries because the principle of development is considered acceptable.</p> <p>For the reasons above it is not proposed to amend the LPR to include sites NEW1, NEW2, and NEW7 as allocations. Therefore no further changes to Policy SP13 are proposed.</p>
Shaw-cum-Donnington Parish Council (lpr207)	Support policy.	Support noted. No further changes to Policy SP13 are proposed.

Respondent (with lpr ref)	Response	Council Response
Thatcham Town Council (lpr1400)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17. (lpr1401)</i></p> <p><b>POLICY SP 13 Sites Allocated</b></p> <p><b>(And reference to Site Assessment and Thatcham Strategic Growth)</b></p> <p>As noted earlier, we do not agree that there should be such a single large site responsible for providing housing supply. The policy is in grave danger of failing should unanticipated delays occur.</p> <p>The Thatcham Strategic Growth study appears to be, at least partly, based on the read-through of the appeal and response by the Secretary of State to the Siege Cross development (Stage 1 Report, section 4.5). This was a proposal for 495 dwellings that did not encroach into the areas now being proposed (Dunston Park, and Colthrop Village) for NE Thatcham, and there were many issues identified in the appeal where the balance of one was outweighed by the balance of another.</p> <p>It cannot be assumed that the same outcome would apply for a different proposal that is approximately five times the scale.</p> <p>We do not agree with the dismissal of alternative sites because "only growth of a strategic scale could support the service provision and regeneration that Thatcham requires". This statement is not backed up with evidence because there has been no publication of the Infrastructure Delivery Plan and there has been no publication that explains how the congestion on surrounding roads would be mitigated. We therefore disagree that neighbouring sites can be discounted when there is a failure of evidence that THA20 can be delivered.</p> <p><b>Section 6.19</b></p>	<p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of over 7 years for the period to 2026/27.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site.</p> <p>The Council is not relying on the total allocation at either Sandford Park or North East Thatcham to meet the need up to 2039.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>Strategic development in Thatcham will bring considerable benefits to the town, not only in the provision of new housing, including affordable housing, but in the provision of new schools, community facilities and recreational provision."</li> </ul> <p>We are concerned that in the context of development there appears to be no consideration given to transport and highways, including air quality. This surprises us because the proposed site, being in an existing rural area, and at distance from proposed employment centres will unavoidably be reliant on private vehicle use. The evidence base provided recognises congestion on the A4, at the station crossing, and surrounding roads yet this evidence appears to have been ignored in the Local Plan.</p> <p>This appears to be a serious omission.</p> <p>It is essential that these omissions are corrected to reflect correctly the balance between benefit and detriment to existing residents.</p>	<p>contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Importantly, the site provides an opportunity to deal with the issue of secondary school provision across the town by providing a site to facilitate a new school, in addition to contribution its share of the cost of the construction of a new school.</p> <p>The concern regarding infrastructure provision is noted. The updated version of the proposed allocation policy will ensure this is addressed. The council will not permit development which does not provide the infrastructure to support it.</p> <p>The Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

Respondent (with lpr ref)	Response	Council Response
		<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
<b>General consultation bodies</b>		
Canal and river Trust (lpr879)	SP13- SP17 inclusive	Comments noted. If sites come forward that are in close proximity to the Kennet and Avon Canal, then the Planning Policy Team will consult the Canal and River Trust.

Respondent (with lpr ref)	Response	Council Response
	<p>At the present time there do not appear to be any sites allocated for housing in close proximity to the Kennet &amp; Avon Canal. If other sites come forward, either via a Planning Policy allocation planning consultation or through the Neighbourhood plan process the Trust will comment further.</p> <p>Furthermore, the Trust may provide additional comments on the suggested sites if it becomes clear that they will have an impact on the canal. Even if a site is not directly adjacent to the canal there may still be an impact on the canal towpath for commuting and leisure purposes which will need to be considered and addressed.</p>	No further changes to Policy SP13 are proposed.
Heritage Forum (lpr80)	<p>Object to policy</p> <p>SP16 We have doubts about this policy in one respect. When the full 1500 dwellings are built and occupied, Warren Road will be the obvious exit for the A34 for all of them, which will cause problems. The volume of traffic will significantly interfere with the local Andover Road traffic for schools, shops, the garage, churches, and community centres. In her comments on 18/00828, Jenny Graham of Transport Policy has already made this point. A more strategic approach is needed to connect the Sandeiford estate to the A34 trunk.</p> <p>Secondly, environmental interests have expressed a preference for a 50 m buffer around the ancient woodland. A recommended buffer distance should be given.</p>	<p>Comments noted. Please see response in SP16 under lpr77.</p> <p>No further changes to Policy SP13 are proposed.</p>
Kennet Primary Care Network (lpr2194)	Further to our conversations last spring and the discussion at Berkshire West CCG Local Management Committee this January, I shared the consultation details with my colleagues in Primary Care for their consideration. Kennet PCN Management Team met this week to review the proposals and would like the following response to be noted and recorded on behalf of the Kennet Primary Care Network including Burdwood Surgery, Thatcham Medical Practice and Falkland Surgery	Comments noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the master planning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers. However, it is noted that the CCG have not submitted any representation against the Emerging IDP, which specifically



Respondent (with lpr ref)	Response	Council Response
	<p>representing their patient populations and staff teams serving those catchments.</p> <p><u>Size of the development</u></p> <p>We recognise that majority of the development fall within the PCN as described in your words:</p> <ul style="list-style-type: none"> <li>• <i>Meeting the majority of development needs through an increased focus on Newbury and Thatcham area, with a specific focus on Thatcham delivering development of a strategic nature. Sandleford will also roll forward as a strategic allocation.</i></li> </ul> <p><u>Impact to general practice</u></p> <p>Whilst we understand the need for development and affordable housing we are not clear how the infrastructure will be developed to respond to that need, in particular to the health – primary care services - GP, medical services and wider health services in the community. The size of the impact this development will have on local services cannot be underestimated. We are just beginning to stabilise from the last planned growths of significance at Kennet Heath and the Racecourse. There does not appear to be a plan to manage the structural changes that will need to occur to address this gap.</p> <p><u>Delivery of Health Services</u></p> <p>We were encouraged that you recognised the need for health and wellbeing to be considered in the wider sense but feel the lack of provision for primary care health services is a major omission and would cause further pressure in an already under resourced system potentially impacting service provision.</p>	<p>refers to GP surgeries. Therefore the IDP remains quiet on this matter.</p> <p>No further changes to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>I am writing on behalf of the PCN to stress the impact of this development needs to be considered in more detail with the PCN. I would suggest we seek to understand, plan and strategically build in an appropriate response that will meet the health needs of the population in a sustainable way and would see this as the start of a dialogue.</p>	
<p>Newbury Society (lpr1149)</p>	<p><b>Individual sites.</b></p> <p>We think that the proposed development sites need to be handled with sensitivity, with the views of existing residents taken into account. In relation to Newbury, we are in favour of flats being built above the Kennet Centre, but would need to see designs before we can assess appropriate numbers. We are not yet convinced that the centre can comfortably take 250, let alone the 400 currently proposed by a developer. We think that development approval should be conditional on spending a significant part of the financial return from the flats on revitalising the ground floor premises, whether for shops or other uses. This could be an opportunity to improve the appearance of this part of Newbury.</p>	<p>Consultation forms a key part of the preparation of the LPR. To date three 'Regulation 18' consultation have been held which considered the proposed scope and content of the plan. There will be a consultation on the proposed submission version of the plan (the final draft), and individuals and organisations will be able to participate in the independent examination of the plan.</p> <p>The LPR proposed for allocation the Kennet Centre for a mixed use development comprising of approximately 250 dwellings. Separate to the LPR, two planning applications have been submitted for the site – one of the applications (ref: 21/00379/FULMAJ) proposes a phased redevelopment for a flexible-use commercial spaces, a headquarters office building, and 381 dwellings. The second application (ref: 21/00380/FUL) proposes 91 retirement living apartments in lieu of the office building in the first application.</p> <p>It is no longer proposed to allocate the Kennet Centre as the site is located within the settlement boundary. Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>Newbury town centre is covered by a Conservation Area and there are many Listed Buildings within the centre as well. Comments</p>

Respondent (with lpr ref)	Response	Council Response
		<p>from Historic England, who are a statutory consultee will be inform the planning applications.</p> <p>A Conservation Area Appraisal for Newbury Town Centre is being produced and this will act as a framework that guides future development within the Conservation Area.</p> <p>The conditions to a planning approval cannot stipulate what the financial return from a development must be spent on as this falls outside the scope of planning. The NPPF states that planning conditions should be kept to a minimum and should only be used where they satisfy the following tests which include amongst others, relevance to planning.</p> <p>It is now proposed to remove the site as the site is located within the settlement boundary whereby there is a presumption in favour of development. Further details of this are set out in the Council's response to representation lpr765.</p> <p>Delete RSA1 from Policy SP13.</p>
West Berkshire Green Exchange (lpr1555)	<p>COVID-19 may not have a long term impact on people's working and shopping habits, but with more people working from home and with the retail sector under pressure, the future of the high street will change and some buildings should be repurposed for housing rather than building new. The energy footprint of converting an existing building is often far lower than building a new one. For example, Historic England has shown that the refurbishment of older buildings can reduce both energy footprint and carbon footprint (<a href="#">There's No Place Like Old Homes, 2019</a>).</p>	<p>The sites that have been identified for allocation were selected from sites put forward to the Council for the HELAA. The sites proposed for allocation in the emerging draft LPR have been assessed by the Council as the most sustainable sites for development. While there may be other sites / buildings, these may not be available. For example, they may not have been submitted to the Council through the HELAA so are not deliverable, or they are not in accordance with other strategic policies in the LPR.</p> <p>Sites can only be allocated if they are deliverable. The NPPF states that <i>"to be considered deliverable, sites should be available now..."</i>.</p> <p>No changes to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
West Berkshire Green Party (lpr1836)	The major developments in Sandford and NE Thatcham should in our view be substantially scaled back or removed.	<p>The principle of development at Sandford Park has been established through the Core Strategy process and the site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p> <p>Outline planning permission has been granted for 1000 dwellings at Sandford Park.</p> <p>No changes to Policy SP13 are proposed.</p>
<b>Other stakeholders</b>		
Paul Little (lpr3)	<p>Object to policy.</p> <p><b>The plan states the following:</b></p> <p><b>Economy</b></p> <p>To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.</p> <p><b>Town Centres</b></p> <p>To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities.</p> <p><b>Green Infrastructure and Healthy Living</b></p>	<p>A masterplan for Thatcham town centre is to be prepared, and it will consider ways to improve the town centre and how it works. The aim is that the masterplan will ensure that infrastructure and town centre facilities can be upgraded to meet the demands of Thatcham Town Council, and the town's residents and businesses.</p> <p>Following changes to the NPPF in the summer of 2021, local planning authorities must now prepare a 30 year vision for where larger scale developments such as new settlements or significant urban extensions form part of the strategy. 30 year vision work is now underway which will consider Newbury and Thatcham and this will inform the next draft of the LPR.</p> <p>The LPR makes provision for employment.</p> <p>In regards to concerns raised about surface water flood risk, new flood alleviation measures would be built into the development. There is a planning application for a basin on the corner of Floral</p>

Respondent (with lpr ref)	Response	Council Response
	<p>To ensure that West Berkshire contains a strong network of multi-functional green infrastructure which provides health and environmental benefits and enhances the overall quality of life of sustainable communities.</p> <p><b>Transport</b></p> <p>To make provision for transport networks that support sustainable growth in West Berkshire and to promote low emission transport choices.</p> <p>Whilst Newbury and Thatcham are separate and distinct towns with their own character, they are geographically close and functionally related. Both towns have significant employment provision and Newbury provides many of the major services, including retail and leisure facilities. There is significant movement between the two towns and transport linkages, by rail and road are vital.</p> <p>The area is well located in terms of access to rail and to the strategic road network. There are train stations at Newbury, Newbury Racecourse and Thatcham enabling rail access to Reading and London and to the West Country.</p> <p>The Newbury and Thatcham urban area is the main focus for development in the current Local Plan and will remain the focus in the Local Plan Review. Though there are constraints of flood zone and designated heritage assets, including the registered battlefield of the Battle of Newbury 1643 immediately to the west of Newbury, there are also opportunities for brownfield development, particularly in Newbury, and for allocation of additional greenfield sites.</p> <p>Town centres will continue to play a vital role for communities and will need to adapt to meet the changing needs of communities. Main town centre uses will be directed to the town and district centres set out in Policy SP20. Within town, district and local centres, schemes will be of</p>	<p>Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation measures are included in the IDP.</p> <p>All new developments must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the North east Thatcham site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>an appropriate scale and character to respond to the role and function of the centre with village centres a focus for facilities aimed at supporting sustainable rural communities.</p> <p>Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements.– <b>Little to no mention of Thatcham Town Centre. This means the focus is to feed Newbury and not develop Thatcham at all. This being the case, why not bulldoze the awful town centre, build houses there and have us all travel to Newbury and further enrich their town?</b></p> <p><b>I refer to now superseded spatial strategy. This was 2012. What has happened since?</b></p> <p><b>We have a Town Centre comprised entirely of Kebab takeaways, Pizza restaurants &amp; Hairdressers. What kind of “destination” is this?</b></p> <p><b>Where are the employment opportunities for the thousands of new inhabitants?</b></p> <p><b>North East Thatcham Strategic Site Allocation</b></p> <p><b>The site, as identified on the map, is allocated for a residential-led development comprising approximately 2,500 dwellings.</b></p> <p><b>These are areas that suffer massive water and soil run off. This then causes flooding down Floral Way and Harts Hill Road and</b></p>	<p>The proposed strategic site allocation at North East Thatcham will include not solely housing. The site will also provide local centres, a GP surgery, early year’s provision, a primary school, secondary school provision, a community indoor facility, outdoor formal and informal sports pitches and areas, open space, and a new community park.</p> <p>The representation comments that the plan needs to consider what local residents want and that Thatcham needs better leisure facilities. As mentioned above, the allocation will include a community indoor facility, outdoor formal and informal sports pitches and areas, open space, and a new community park.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>subsequently the A4. Build on this land, and where will all that water go?</b></p> <p><b>The Councils record on highways, A4 from Midgham to Newbury always underwater, is poor. This makes it impossible to cycle along, which wipes out any claims for sustainable transport.</b></p> <p><b>Even worse are the cycle lanes that end with nowhere to go. My personal favourite is the stop start cycle lanes from Thatcham to Newbury that only go one way (to Newbury). The A4 East has no such return lane.</b></p> <p><b>This plan only creates housing. The proposal is for a mini Lower Earley. As anyone who is familiar with Lower Earley will know, J11 and surrounding areas come rush hours is a hideous place to be. That is because people only live in Lower Earley. To work, they have to travel out to other places.</b></p> <p><b>The plan seeks to replicate this dreadful experience, unlearnt, to West Berkshire, and Thatcham is totally neglected aside from a couple of mini shop jobs. This doesn't foster community, it creates a huge housing development of nomads.</b></p> <p><b>West Berkshire's new tagline "Thatcham, a great place to leave"</b></p> <p>Changes sought:</p> <p>Any plan needs to consider what people need locally. Thatcham needs better leisure facilities. Anyone playing Rugby or Football is at the mercy of the Council and Henwick Fields being continually closed. Support for our incredibly talented Amateur sports clubs needs to be given with improved facilities.</p>	
Simon Spellar (lpr8)	Object to policy.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>Whilst I recognise AONB and flood constraints of the district it is a concern that the Council has yet again defaulted to Thatcham to provide its housing need. This is to a large extent due to a complete failure to deliver the Sandleford site (the Council claim to be Plan led - that means delivering the Plan) as well as the issues around Grazeley. There should be a better balance of locations for housing in the District including the built up areas of Tilehurst and Theale which is more sustainable than Thatcham for a number of reasons.</p> <p>Having said the above I can accept that there may be a need for more housing in Thatcham and NE Thatcham is an option for this and in which case the test of acceptability is more about it not being 'just another mediocre housing estate'.</p> <p>The main concerns I have with the existing policy are as follows (these are not in order of importance - all are important) :</p> <ol style="list-style-type: none"> <li>1. The need for trees - this is a huge development and needs a real commitment to tree planting up front and of a scale to make an environmental and biodiversity impact. There is a real scope here to do things differently and plan further ahead given the large scale of the development and that it will be delivered across 2 Plan periods. Rather than planning to create green barriers and wildlife corridors during the construction of large scale development, managed forests could be planted at the outset - resulting in mature areas of trees before the latter phases of development and this would also help with achieving a better balance towards carbon neutrality.</li> <li>2. Northern boundary and comprehensive development</li> </ol> <p>I do not consider that present allocation provides a sensible and long term northern boundary. As the Local Plan also relies upon a large number of windfall sites coming forwards I would suggest it is inevitable</p>	<p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding. As part of the LPR, all sites promoted to the Council have been assessed in the HELAA.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The Council responses to SP17 consider the specifics of the policy requirements. It is proposed to deliver a package of infrastructure. The NPPF will also need to be taken into account when designing a masterplan and in determining a planning application. As well as specific policies within the Local Plan Review (eg design, trees, green infrastructure, affordable housing) this includes requirements for tree planting, building beautiful. First Homes is now in place, which is a form of affordable housing, placing a cap on the price of housing, and are purchased or rented by buyers or tenants who meet the eligibility criteria set out in the Council's First Homes Policy.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>that land around the north of Thatcham / Cold Ash border will be developed in time. This should be accepted and planned for now in a comprehensive manner not ignored hoping it will go away. It won't. The Council should be looking comprehensively at development around the edges of Thatcham. The land north of Thatcham has been promoted for housing for 15+ years with various planning applications - it is time to be truly comprehensive in planning the towns expansion including thinking of what infrastructure needs and delivery opportunities this brings given it is inevitable the northern areas will be developed too in time. This may mean that the artificial cap of 2,500 dwellings may be more - as long as done correctly sobeit.</p> <p>3. Building beautiful</p> <p>There is nothing in poilicy on quality of the housing and architecture. This needs to to be high on agenda to create a quality place</p> <p>3. Sports and obesity</p> <p>We live in a time of an obesity crisis in young and old alike. Unyet our sports facilities are full up. Henwick has no capacity and there needs to be a more comprehensive Plan for sports in the town. These could be shared facilities with the secondary school (as at Kennet School) – but if so needs to be provided much earlier on and not to the ‘bare minimum’ educational need but be truly aspirational facilities for the town (and surrounding villages) to be proud of - not an insular provison to meet the needs to the new housing alone – we need bigger and better.</p> <p>4. Health</p> <p>We have a town with health facilities at capacity. there is a requirement for expanded / new GPs and dentists to serve expanded town. This</p>	<p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>No further changes to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>doesn't need to be in the expansion area and could be used as a catalyst to redevelop Broadway or other parts of town, but is needed early on.</p> <p>5. Key worker not affordable housing</p> <p>The policy requirements for affordable housing need to be more nuanced. There is a desperate need for Key Worker housing for doctors, nurses and other key workers - we all clapped them in the summer months - time to start to plan for them too in the future. Key Worker housing should be a significant proportion of the social housing - perhaps 2/3rds</p> <p>6. Biodiversity</p> <p>We need insect-friendly planting with minimum maintenance plants that flower and produce nectar followed by berries later in the year.</p> <p>Summary</p> <p>The above are measures of what people value and impact on the town - this is an opportunity to deliver on elements that will impact the quality of community life and the policy is not aspirational enough in that regard</p> <p>I am not against allocating growth. I am not even against that being around Thatcham but it needs to be better than this Plan says is the requirement.</p> <p>It is better to have a strategic allocation if it delivers more than just basic housing. So the real question is whether it will.</p> <p>Phasing and delivering core infrastructure is key, especially health and sports. The present Plan is also not bold enough on climate emergency or Biodiversity – it is not about just achieving some net gain over existing</p>	

Respondent (with lpr ref)	Response	Council Response
	– lets actually look to achieve something positive for nature and people to be proud of.	
David Bridle (lpr20)	<p>Object to policy.</p> <p>The Thatcham North East allocation would need to address / mitigate the following existing and subsequent adverse impacts. There is surely opportunity to redress some of these issues:</p> <ol style="list-style-type: none"> <li>1. Telecommunications Infrastructure - already telecommunications infrastructure (e.g mobile phone signal strength is relatively poor for a 'town'. Additional 4G &amp; 5G masts with good coverage are required.</li> <li>2. Traffic volumes &amp; road safety especially outside schools! Already existing poor provision of effective vehicle speed reduction measures outside high risk sites/routes such as North Thatcham Childrens Centre &amp; Park Primary on Park Lane (RG18 3BZ). Narrow pavement, no automated vehicle speed/warning signage or speed camera, no safe crossing points, ineffective speed pillows. All such roads needs to be 20MPH to change driver behaviour. (There is reference in SP other policies that new developments should not have adverse affect on the health and safety of existing communities). Higher volumes on these high risk routes will create an adverse impact.</li> <li>3. The development needs to provide adequate on site childrens services/centre and not increase the numbers using the existing North Thatcham Childrens Centre where there is already high pedestrian/vehicle conflict/risk. A new doctors surgery also required to avoid 2000 people having to travel through local roads to the A4 surgery further compounding traffic and road safety issues.</li> </ol>	<p>Comments noted.</p> <p>See response to SP17 (lpr21) as these are specific to the policy for North East Thatcham.</p> <p>The allocation for SP17 has now been amended in Policy SP13 to 1500 dwellings.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>4. Construction Traffic Management plans (working with West Berks Highways) should be effective in preventing use by construction traffic of nearby residential through roads such as Park Lane.</p> <p>5. Emergency Services and associated indirect noise impact - Thatcham Central and North residents already have to tolerate almost constant siren noise from predominantly ambulances using A4 to get to the Reading Hospital. Ambulances from Newbury station (the West) should use the Northern ring road to access this new development as it has the higher 40mph limit and should be facilitate faster access in and out to the Reading Hospital instead of trying to navigate an already conjested Thatcham Town centre A4 bottleneck. Have SC Ambulance Service been consulted and what are there repsonse plans re access?</p> <p>6. Housing provision - affordable housing (40% planned). Thatcham North already has an over-concentration of 'affordable and especially social' housing - refer to National Indeces of Deprivation maps, Sovereign Housing Association maps, and house price maps for West Berkshire (e.g Park Avenue Estate and Sagecroft Estate). There should be a balance/mix of housing provision accross West Berkshire and Thatchams already high concentration of such housing should not be compounded by additioanal provision of low quality / social / affordable housing - the mix should redress the balance by allocating a percentage that adjusts the mix to counter this overconcentration.</p> <p>7. Areas of open space should have clear mamagement and maintenance responsibilities clearly contracted and understood. There are many areas in Thatcham where land ownership is unclear and threfore such areas fall into disrepair. Any SUDS features would also come into this.</p> <p>8. Leisure provision - North Thatcam has very few and low quality areas for leisure, especially for children. For exexample, Memorial Park, Sagecroft and Park Avenue estates have no/very poor provision. There</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>is an over reliance on the 'Discovery centre' as a leisure destination. North Thatcham would benefit (as there are high proportion of young families) from creation of a high quality childrens adventure play area opportunity for example in the Memorial Park.</p> <p>9. Cycles often use public footpaths instead of local roads - better highways management and traffic claming / management to make local residential through roads/highways safer for sustainable transport.</p> <p>10. NE Thatcham would benefit from adequate provision of retail centres with appropriate parking capacity where food retailers such as Lidl / Aldi can operate. Currently everyone from East, Central and North Thatcham has to travel to East Newbury, Tesco, Lidl, Aldi (for lower cost food) increasing pressure on our already congested local road network which suffers high pollution levels, especially along the A4 Town centre and residential through roads.</p> <p>11. The Town centre and local 'destinations' and surrounding access routes would benefit from better (dropped kerb surveys and dedicated cycling paths) for walking and cycling access, as well as additional (frequent) local small bus service routes.</p> <p>12. Litter. Provision of more waste bins, in and around the town centre which is already dominated by takeaway provision, leading to local residents suffering from persistent rubbish along paths and streets surrounding the town centre where Thatcham Council do not operate regular litter picking rotas.</p> <p>13. Opportunity to enhance Thatcham appearance through biodiversity - through better management of unmanaged grass areas. There are many unkept small roadside areas which are grass which could be planted (with support from local residents to take ownership of maintenance). Such areas could be removed from grass cutting contracts saving council £ as they are often hard to access with</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>machinery. North Thatcham Sagecroft Estate and Park Avenue has such areas, often uncut, covered in litter and with no locals taking responsibility to enhance their own living environments.</p>	
Susan Millington (lpr463)	<p>Object to policy.</p> <p>The proposed developments at Sandford and NE Thatcham should be scaled back substantially or removed entirely.</p>	<p>Comments noted.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site.</p> <p>The allocation for SP17 North East Thatcham is proposed to be reduced to 1500. Policy SP13 has been amended to reflect this.</p>
David Kiff (lpr1631)	<p>SP13 and para 6.19 and SP16</p> <p>The application by Bloor Homes for planning permission to build 1000 homes at Sandford Park was refused by West Berkshire Council in October 2020. They stated that they have been unable to find an acceptable solution to the problems with the development so that the development can be said to improve the economic, social and environmental conditions of the area. The Council listed 14 reasons for refusal ranging from a lack of a holistic approach, its impact on the environment and ancient woodland, impact on the A34 and failure to secure delivery of necessary infrastructure.</p> <p>The application fails to provide adequate certainty and confidence that the proposal will deliver the comprehensive development of the Sandford strategic site allocation as a whole along with coordinated and timely delivery of the associated infrastructure, services and facilities necessary to mitigate its impact across the entirety of the SSA and</p>	<p>Comments noted.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site.</p> <p>It will remain as an allocation and therefore remains within Policy SP13.</p> <p>No further changes to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>beyond. Another reason was the failure of the development to meet the Council's aim for making the district net carbon zero by 2030, as declared in their climate emergency.</p> <p>It is considered to be an unsustainable and harmful development by failing to reduce carbon dioxide emissions. In addition, other reasons cited for refusal were potential harm to the ancient woodland on the site and the potential severe impact on the A34. Also failure to secure satisfactory planning obligations for infrastructure and mitigation measures.</p> <p>In the light of all of the above Sandford Park Newbury is a totally unsatisfactory site for a major housing development and therefore be removed from the list of sites allocated for residential and mixed use development.</p>	
<p>Debby Reynolds (lpr1308) David Copas (1434)</p>	<p>Object to policy.</p> <p>[Letter attached. Other comments added to other relevant consultation points]</p> <p><b>Response to consultation by West Berkshire Council on Emerging Draft West Berks LPR and Thatcham Growth Study Stage 3 report by David Lock Associates</b></p> <p>[NB. The response is recorded all together under lpr1305 for SP17 NE Thatcham, and separately in lpr 1306,1307,1309 and 1310. It keeps the original numbering of the recommendations.]</p> <p><b>Chapter 6 Delivering housing</b></p> <p>SP 13 lists the sites for residential and mixed use in Newbury and Thatcham for sites 1 ha or more. Here it adds in NE Thatcham as SP17 for the first time. This draft local plan review and associated</p>	<p>Comments noted.</p> <p>The Local Plan Review seeks to carry forward housing allocations from the Housing Site Allocations Development Plan Document which have not yet come forward or have commenced, and seeks to allocate new sites in order to meet the housing target for West Berkshire. Provision will be made for 8,721 to 9,146 net additional homes in the District over the plan period. Thatcham is in the Urban Area, as set out in the Settlement Hierarchy, which, along with Newbury and the Eastern Urban Area, is a focus for housing and economic development.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>report therefore set out a huge increase in development area and house numbers.</p> <p>There is no justification for such an increase in allocation, and in SP17 the proposal of 2500 houses is completely disproportionate for Thatcham and surrounding areas. In the opinion of Bucklebury Parish Council the figures are flawed and therefore withdrawal for a fundamental review and meaningful justification is essential.</p> <p>The impact on the local setting and breach of the Floral Way boundary, objections raised by the North Wessex AONB, are not addressed. No case has been made for ribbon development and the 'Colthrop village' concept is a completely unacceptable joining up of Midgham and Bucklebury Parishes with Thatcham and should be removed from any future considerations.</p> <p>Any housing allocation must demonstrate local benefits to the natural environment.</p> <p>The model for infrastructure provision is dependent on realising house sales, therefore is not 'baked-in' or inevitable. A transparent, enforceable commitment to ensure fair share of profit and investments in local assets is an essential pre-commencement commitment which should be policy for any development.</p> <p>The level of ambition for infrastructure provision and biodiversity gain is insufficient. No budget is allocated to achieving 10% biodiversity gain in the appraisal of viability, the design features do not demonstrate any input from conservation professionals, nationally or locally.</p> <p>Green and biodiverse are not equivalent. The concept, beneficiaries and impact of a new strategic country park are unclear. Any future</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>consideration of the idea must make clear that is outside the area of allocation and protected in perpetuity.</p> <p>If land at 'Colthrop village' is no longer needed for farming it should be entirely devoted to biodiversity net gain and used to establish a fully functional wildlife corridor between the Kennet valley and Bucklebury heathland.</p> <p>Numerous aspects of the Bucklebury vision have been ignored. It appears that the views of residents on the edge of the proposed area were either not sought or not taken into account.</p> <p>Changes sought:</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 6 – SP13 is unacceptable and needs alteration, particularly removal of the proposed NE Thatcham line item.</b> All the reasons are set out above and in the Bucklebury Parish Council and Thatcham Town Council submissions.</li> </ul>	<p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>As part of the submission version of the Local Plan Review the housing number to be delivered in the plan period has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p> <p>No further changes to Policy SP13 are proposed.</p>
Graham Storey (lpr573)	<p>Object to policy.</p> <p>Too dependent on Sandlesford and NE Thatcham</p> <p>Changes sought:</p> <p>The major developments in Sandlesford and NE Thatcham should be substantially scaled back or removed</p>	<p>Comments noted.</p> <p>The Sandlesford development now has the benefit of outline planning consent for 1000 dwellings, following an allowed appeal. It will remain as an allocation and therefore remains within Policy SP13.</p> <p>With regard to North East Thatcham, as part of the submission version of the Local Plan Review the housing number to be delivered in the plan period has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p>
Ian Halliday (lpr616) Jane Halliday (lpr617)	<p>Object to policy.</p> <p><b>SP13 Sites allocated in Newbury and Thatcham.</b> The major developments in Sandlesford and NE Thatcham should be substantially scaled back or removed for the environmental reasons stated above and because there is too heavy a reliance on these two sites and insufficient focus on developing brownfield and windfall site opportunities.</p> <p>Changes sought:</p> <p>The major developments in Sandlesford and NE Thatcham should be substantially scaled back or removed.</p>	<p>With regard to North East Thatcham, as part of the submission version of the Local Plan Review the housing number to be delivered in the plan period has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p>

Respondent (with lpr ref)	Response	Council Response
Tim Hall (lpr650)	<p>Object to policy.</p> <p>Reasons: Sandford, Thatcham NE</p> <p>Changes sought:</p> <p>Many more other opportunities for adaptation, intensification and beautification within existing built up areas and brownfield sites are needed to provide attractive more sustainable locations for excellent living conditions instead.</p>	<p>With regard to North East Thatcham, as part of the submission version of the Local Plan Review the housing number to be delivered in the plan period has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p>
Allison Butcher (lpr2126)	<p>SP 13, in Chapter 6, introduces <b>NE Thatcham (SP 17), and the development of 2500 houses</b>. Such a disproportionately large development will have an unacceptable impact on a town the size of Thatcham and on the surrounding rural area and villages. I agree with the findings of the BPC that the housing demand analysis is flawed, and that the effects of the Covid-19 pandemic in relation to the proposed housing needs have not been taken into consideration.</p> <p>Changes sought:</p> <p>SP13 : to be retracted and extensively amended in line with reasons submitted by the BPC and individual residents to the WBC.</p> <p>Consultation with all stakeholders on changes and improvements to the LPR, with a fair and realistic timeline for all</p>	<p>With regard to North East Thatcham, as part of the submission version of the Local Plan Review the housing number to be delivered in the plan period has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p> <p>No further changes to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
Richard Foster (lpr2452)	<p>Object to policy.</p> <ol style="list-style-type: none"> <li>1. Thatcham has suffered from over-development and lack of infrastructure over the years since the 1970s. This is acknowledged in the document, but the town is not going to get the new infrastructure it needs from just building new houses , as the CIL money will not cover the deficit in infrastructure as well as the new infrastructure required for the development itself.</li> <li>2. The document gives the feel that 2,500 houses have been dumped on Thatcham because the planners cannot think of anywhere else to put them. That is not a sound basis for planning. The document explains that 74% of the area is AONB, which leaves essentially only the Kennet Valley from Newbury eastwards as available for substantial development. But even that is constrained at the east end by the proximity to Burghfield and Aldermaston nuclear sites. So the available space is shrunk to Newbury and Thatcham, and Newbury already has a controversial planning site on its hands at Sandleford. Hence the requirement to find land is focussed on Thatcham even though it is already over-developed.</li> <li>3. The document makes reference to the need to develop in a sustainable way, and references West Berks Council's environmental plan with its intention of achieving carbon zero by 2030. But the implementation plan that will show how the environmental plan's objectives will be met, has not yet been written. Until it is, the local development plan should be withheld because it will need to include policies on planning that emerge from the environmental implementation plan. The LDP must be subservient to the environmental implementation plan.</li> </ol> <p><b>Transport</b></p> <ol style="list-style-type: none"> <li>1. Policy SP 22 states that a full Transport Assessment will be required where 60 or more dwellings are proposed. There is no indication that such an assessment has already been made.</li> </ol>	<p>As part of the submission version of the Local Plan Review the housing number to be delivered in the plan period in North East Thatcham has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p> <p>The LPR is the statutory land use plan for the area and has regard to all of the Council's strategies.</p> <p>Transport modelling for the site has been undertaken on the assumption of 2500 dwellings. The associated infrastructure</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Access to Thatcham from the south is solely via the level crossing which is already saturated at peak times. Similarly, from the north, access is mainly via Cold Ash which also has queueing at peak times. Traffic heading west from Thatcham will take either Floral Way or the A4 and then London Road into Newbury, which again, already queues at peak times.</p> <ol style="list-style-type: none"> <li>2. Travel to Basingstoke from Thatcham has to be via either the level crossing or via Brimpton. Neither of these routes can take significant extra traffic. To suggest that it is practical to travel from Thatcham to Basingstoke by any other method than by car shows ignorance of the options available.</li> <li>3. An extra 2,500 Homes in Thatcham can only exacerbate that queueing in those three directions. A preliminary transport assessment is urgently needed, not by a developer but by West Berks Council, and almost certainly it would show that excessive queueing will make the proposed development impractical.</li> <li>4. Furthermore there is no recognition of the current restrictions on driving to the station: you can't depend on getting there without queueing, and when you do get there there is nowhere to park. So you abandon your car on a street. Building more houses will only exacerbate this problem.</li> </ol> <p><b>Infrastructure</b></p> <ol style="list-style-type: none"> <li>1. Paragraph 6.36 acknowledges that “the provision of social infrastructure has not kept pace with housing population growth”. I assume this to mean leisure, sports and entertainment facilities including the library.</li> <li>2. Paragraph 6.39 acknowledges that Thatcham is deficient in services provision, “including public services and commercial services”. I assume that means services such as medical centres, schools, retail shops and public transport.</li> <li>3. Paragraph 6.40 claims that “only growth of a strategic scale can support the service provision and regeneration that Thatcham requires.” There is no support for that statement and it is hard to</li> </ol>	<p>requirements, including highway and transport improvements are reflected in the Emerging Draft Infrastructure Delivery Plan (August 2021).</p> <p>The associated infrastructure requirements, social infrastructure, are reflected in the Emerging Draft Infrastructure Delivery Plan (August 2021).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>see how a town that is deficient in infrastructure and services can have that remedied by building even more houses, causing even more of a deficiency. I would expect the deficiency to be remedied first before considering substantially more housing.</p> <p>4. In fact the whole strategy is a complete volte face from the vision for Thatcham described in Paragraph 6.37 where housing expansion was centred on Newbury. It needs much more public explanation and debate before being turned into a plan, at a time when Covid restrictions are no longer a constraint on people's geographic movement.</p>	<p>No further changes to Policy SP13 are proposed.</p>
<p>Tony Vickers (lpr539)</p>	<p>Support policy.</p> <p>In general, we support the policy of having the main focus for growth in this area. However we think the total number is too high in absolute terms as well as relative to the rest of the District.</p> <p>Our detailed comments on this policy are in other parts of our LPR response, especially SPs 16 &amp; 17. We expect the list of non-strategic housing sites to have changed before the Reg. 19 draft, with some deletions, amended numbers and additions.</p> <p>Changes sought:</p> <p>Delete SP17, RSA5. Reconsider other sites, as detailed later in the document.</p>	<p>Support noted.</p> <p>As part of the submission version of the Local Plan Review the housing number to be delivered in the plan period in North East Thatcham has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p> <p>No further changes to Policy SP13 are proposed.</p> <p>SP17 (North East Thatcham) is not proposed to be deleted but will be amended to reflect 1500 dwellings.</p>

Respondent (with lpr ref)	Response	Council Response
		RSA5 (Land adjoining New Road, Newbury) is proposed to be deleted and this will be reflected in the Policy SP13.
Cllr Alan Macro (lpr758)	<p>Object to policy.</p> <p>The proposal to allocate a 2,500 homes strategic housing allocation at NE Thatcham (SP17) risks "putting all eggs in one basket" making it subject to risks such as have been experienced with the strategic allocation at Sandleford.</p> <p>The proposed strategic housing allocation at NE Thatcham (SP17) would greatly increase the level of traffic on the A4. Many vehicles would head east along the A4 to Reading and to the M4 leading to increased, unacceptable congestion at junctions, particularly with the A340 in Theale, with Hoad Way and Waterside Drive in Theale and at M4 Junction 12. There is already significant delays of 165 seconds for traffic emerging from Waterside Drive onto the A4 in the evening peak (TomTom data for April 1-4 2019).</p> <p>Changes sought:</p> <p>Strategic allocation SP17 should be removed from the plan and modest allocations made at larger villages around the district (as described in comment on SP3), thus spreading traffic increases around the district and reducing the extra traffic on the A4.</p>	<p>As part of the submission version of the Local Plan Review the housing number to be delivered in the plan period in North East Thatcham has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p> <p>Transport modelling for the site has been undertaken on the assumption of 2500 dwellings. The associated infrastructure requirements, including highway and transport improvements are reflected in the Emerging Draft Infrastructure Delivery Plan (August 2021).</p> <p>No further changes to Policy SP13 are proposed.</p>
Nataliya Topliss (lpr789)	<p>Object to policy.</p> <p><i>Some personal details and references have been removed from representation</i></p> <p>3.1 Thatcham has not had any significant infrastructure investments despite recent rapid residential growth. There has been failure over many years by the Conservative lead West Berks Council to invest in the area and most basic infrastructure of the town center. As a resident of</p>	<p>As part of the submission version of the Local Plan Review the housing number to be delivered in the plan period in North East Thatcham has been amended to 1500. Therefore Policy SP17 as referred to in Policy SP13 has been amended to 1500 dwellings.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Thatcham, I notice over the years that the town has extensive developments taking place all over the town but town's infrastructure and facilities do not improve.</p> <p>3.2 The only thing that Thatcham is not lacking is housing. Town has numerous developments over the years but no investments whatsoever into any kind of facilities or infrastructure. West Berks council do everything to finally completely destroy this town. If you ask local residents then they will say that the council uses Thatcham as the dumping place for their development targets. The only thing that has changed over the last 20 years in this town is the endless growing development sites. I have have to travel to work in Reading. My husband aslo was not able to get a job in Thatcham. There are no local jobs and the majority of town's population travel to Reading or other towns to get employment. The transport links are of full capacity with congestion on the A4. Before pandemic, my husband and I spend 1 hour 30 min daily to travel from Thatcham to Reading by using the A4. This trip should take 25 min but due to daily congestions we had to spend up to 2 hours one way on the A4 every day in order to get from Thatcham to Reading. The trains were also always full. The last thing Thatcham needs is housing.</p> <p>3.3 The proposal makes no real commitment to town centre regeneration nor does it do anything to address air quality. The proposal for development fails to make any specific requiremts for the development to be net zero carbon. Town has no parks or large green spaces for its population. Tree officers from West Berks council always approve for mature trees to be cut down to accommodate all developments. Of course, no new trees get planted as no checks on whether conditions of the planning permissions relating to landscaping and trees are fulfilled. All mature trees get destroyed.</p> <p>3.4. Thatcham is a grey derelict place with no parks or greenery. West Berks council do not do anything to make Thatcham healthy and green</p>	<p>Transport modelling for the site has been undertaken on the assumption of 2500 dwellings. The associated infrastructure requirements, including highway and transport improvements are reflected in the Emerging Draft Infrastructure Delivery Plan (August 2021).</p> <p>Separate policies in the LPR deal with air quality and net zero carbon.</p> <p>Part of the proposal for NE Thatcham includes a new park plus additional open spaces.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>place to live. New plans for development on 170 acres of green land will destroy Thatcham's countryside.</p> <p>Changes sought:</p> <p>West Berks Council's strategy of 2012 indentified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>No further changes to Policy SP13 are proposed.</p>
<b>Landowners, site promoters and developers</b>		
<p>Prosper Infinity Ltd. (lpr179)</p>	<p>Object to policy.</p> <ol style="list-style-type: none"> <li>1. Avoid using greenbelt or undeveloped land where possible.</li> <li>2. Suggesting a redevelopment site in Thatcham that is brownfield i.e. developed upon and entirely hardstanding and demonstrates it is in a sustainable location.</li> </ol> <p>Changes sought:</p> <p>Having also reviewed the current West Berkshire local plan (which includes the core strategy development plan and Housing site allocations plan), and the National Planning Policy Framework, I agree with the purpose of the LPR in achieving sustainable development that meets the needs of the present and future generations. <i><u>I would like to focus my comments on the sections of the proposed development strategy in the spatial areas of Newbury and Thatcham.</u></i></p> <p>I would respectfully like to draw your attention to a brownfield parcel of land known as 'Newbury Leisure Park' which should be considered for redevelopment to assist in meeting the housing needs over the coming</p>	<p>Comments noted.</p> <p>There is no Green Belt in West Berkshire. There is a general presumption in favour of developing brownfield land, and there are opportunities to make use of such land within settlement boundaries.</p> <p>Greenfield sites are needed, and at the scale of NE Thatcham and Sandleford, this seeks to deliver the infrastructure needed to support development and benefit the local community.</p> <p>The site at Newbury Leisure Park has been assessed through the HELAA, to be published alongside the submission version of the Local Plan. The HELAA assessment identifies that the site is potentially developable in part. However, this would be limited by the extent of the area within Flood Zones 2 and 3. Ecology assessments would be required, given the proximity of the site to the SSSI and SAC. It is not proposed to allocate the site in the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>years. I enclose with these representations 2 title plans identifying the site which is in our ownership and control. The reason I would like to draw your attention to this parcel of land is because the site has exhausted its usefulness as a leisure facility. The current operator of the tenpin bowling centre has been struggling to make it a successful business over the last 2 and a half years, and is taking advice on dissolution processes. Prior to that, the previous 2 owners, namely MFA Bowl Ltd and Newbury Leisure Ltd also went into administration. As the owner of the land, I can prove that a financially stable and experienced leisure operator has been impossible to identify at each liquidation juncture when the previous three operators have failed to make this a profitable site over the last 8 years. The land is brownfield land {as confirmed by the Council in the Officer's report for application ref 09/01988/COMIND) and is available, deliverable and developable.</p> <p>I strongly feel that the site meets the strategic objectives of the LPR and has capacity for approximately 100 units of housing. It is sustainable being previously developed land on the edge of the settlement and historic an active destination in its own right, and by replacing the leisure use with residential it would fit with the LPR strategy of focusing leisure uses in the Town Centres of Newbury and Thatcham and reusing previously developed land (in accordance with the NPPF).</p> <p>Additionally, the existing use demonstrates that it is a sustainable location which already uses existing transport and infrastructure.</p> <p>Policy SP1, SP3 and Policy SP17 suggests Thatcham will be a focus for regeneration. The LPR Policy SP3 also states '...the urban areas will be the prime focus for housing and economic redevelopment of suitable previously developed sites for housing purposes...'. Policy SP12 also states the approach to housing delivery uses the opportunity to use developed land. I would like to suggest that the council considers redevelopment of the land on Lower Way called Newbury Leisure Park where 4 of the 4.25 acres sits on either Flood Zone 1 or 2, and therefore a managed development within WBC guidelines would not pose a flood</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>risk for residential dwellings. Indeed, given the site is presently almost entirely hardstanding and buildings, the redevelopment provides the opportunity for betterment in terms of flood management, landscaping and biodiversity net gain.</p> <p>Policy SP13 and particularly Policy SP17 suggests a number of large sites that are either green belt or undeveloped land at present. The Newbury Leisure Park site should be considered ahead of greenfield development given it is previously developed land in a sustainable location on the edge of the settlement (the settlement boundary runs along Lower Road, the site's northern boundary).</p> <p>I will make time to discuss this opportunity with the planning team in further detail should they have any additional questions. I admire the fact that the whole strategy of the <b>LPR</b> talks about West Berks focusing on previously developed land (PDL), and this parcel of land on Lower Way fits this description exactly. I look forward to hearing from the Planning Policy team.</p>	
Pro Vision for Sir Richard Sutton Ltd. (lpr2081)	<p>Object to policy.</p> <p><i>Full representation on behalf of Sir Richard Sutton Ltd promoting land for development at Stockcross is attached.</i></p> <p>Representation makes the case for alignment of the settlement boundary to include HELAA site SPE3, allocation of SPE4, SPE5 and SPE6. Representation covers highways and access issues and conclude that all four sites can be developed without a severe impact on highway capacity and that safe and suitable access can be provided to each site.</p>	<p>Comments noted (please see response to Appendix 3 lpr2080).</p> <p>As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and these sites were considered as part of that process. Whilst acknowledging the arguments put forward by the site promoter, the Council does not believe the sites meet the criteria for inclusion within the boundary. It is not the role of the settlement boundary review to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in the proposed submission version of the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>A housing allocation (or allocations) at Stockcross would accord with the NPPF's and the RLP's objectives to 1) provide development in rural areas to maintain and enhance the long-term sustainability of rural communities, and 2) contribute to delivering a range of site sizes for residential development.</p> <p>All four sites are deliverable (in the terms of the NPPF's definition) in that they are available now, offer a suitable location for development and are achievable (given that the sites and the land required to implement the identified highway improvements are owned by SRSL - with no legal or commercial impediments to delivery).</p> <p>Changes sought;</p> <p>Extension of settlement boundary and allocation of sites at Stckcross.</p>	
Fisher German LLP for M and W Musgrave and Begley (lpr1230)	<p>Object to policy.</p> <p><i>Complete representations from Fisher German LLP are attached</i></p> <p>A critical part of the Council's supply equating to 40% of the housing requirement derives from two large scale allocations in Newbury and Thatcham; Sandlesford Park, Newbury (1,500 dwellings) and North East Thatcham (2,500 dwellings). We have a number of concerns relating to the reliance on these sites, as clearly if there were to be issues in delivering these strategic sites this would mean the Plan would underdeliver significantly against even base Local Housing Need, let alone any uplift, only delivering circa 7,620 dwellings if all other sites delivered and the windfall rate maintained.</p> <p>Sandlesford Park is a locally difficult site, with multiple applications refused in the previous five years. There is currently an ongoing appeal in relation to the most recent application, which was submitted in May 2020 and refused in October 2020. The record of uncooperative working</p>	<p>The Council's strategy is for a mix of sites: strategic sites such as Sandlesford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandlesford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandlesford Park site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and multiple refusals leads to severe concerns of any positive permission being received on this site. If the Council continues with this allocation, it will find itself in the situation where it is simultaneously promoting a site for development whilst defending a refusal at appeal for the same site. This situation must be highly confusing and frustrating for local residents and must cast serious doubt as to whether a suitable scheme can be advanced on the site.</p> <p>The Council has not provided any clear indication of a change of approach from the applicants that would enable a suitable scheme to come forward, and the ongoing appeal would appear to suggest that there remains a conflict between the two parties. Given this site has been allocated for 9 years, with a supporting DPD for 8 years, the lack of a suitable planning permission or even application places severe doubt as to the delivery of this site. Unless evidence can be provided that there is a clear agreement in place between the promoters and the Council as to how this site can be delivered in the Plan period, in a way acceptable to the Council, this site cannot be considered deliverable.</p> <p>North East Thatcham also has a chequered planning history, with the Council refusing an application for part of the site in February 2015. Ref 15/00296/OUTMAJ, with a multitude of reasons for refusal, including impacts on landscape. The applicants appealed this decision and following a public inquiry the appeal was to be allowed due to Paragraph 14 of the NPPF being engaged due to a lack of housing land supply. However, the decision was called in by the Secretary of State who dismissed the appeal in July 2017, against the recommendation of the Inspector.</p> <p>It is understood that the Council consider this site will deliver at least 1,250 dwellings over the Plan period, although due to a lack of a published trajectory it is not clear when they consider a start will be made and what the assumed delivery rates are. As acknowledged by the Site Selection Background Paper (2020), there is a lack of evidence as to the ability to service the site and what works would be required to ensure that there is utilities capacity to deliver the site at the rate the site is</p>	<p>The Council is not relying on the total allocation at either Sandleford Park or North East Thatcham to meet the need up to 2039.</p> <p>For Sandleford, see responses to Policy SP16. The principle of development on the site for up to 2000 dwellings has been established through the Core Strategy process. The site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p> <p>In light of the progress that has been made on the site since the Regulation 18 consultation, the Council are confident that the site will deliver within the LPR period.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>expected to deliver. There is currently no comprehensive application for the delivery of the site, and it is unclear when one will be submitted. Given the various issues associated with the delivery of Sandleford Park, and the time taken thus far, it is vital that realistic and robust assumptions are made for the delivery of the North East Thatcham site.</p> <p>Considering the above, we do not consider that the Council has made sufficient housing provision to ensure the Plan is robust. The Plan's housing delivery hinges on the delivery of these two strategic sites, and there is a lack of published evidence to suggest that things have changed from historic applications to give any confidence that acceptable schemes will be brought forward. Ultimately, the Council risks being forced into approving housing on these sites, even if the applications do not meet its standards, as the Plan needs them to deliver. Additional allocations would enable sufficient lead in times for these sites to be developed robustly and come forward, without placing the Council under undue pressure to accept what would otherwise be unacceptable applications. Additional allocations would also safeguard the Council's rolling five-year housing land supply and ensure the Housing Delivery Test is satisfied if these sites do not deliver.</p>	
Solve Planning Ltd for Emily West (lpr1425)	<p>Object to policy.</p> <p>Policies SP13 and RSA4 identify a site at Stoney Lane for the delivery of up to 75 dwellings. This site is well placed on the edge of Newbury but, alongside an additional site has the potential to deliver more dwellings on the edge of the main settlement of Newbury.</p> <p>Previous representations have been made relating to the additional site to the north and this has the potential to increase further the level of housing delivery from this site.</p> <p>Changes sought:</p>	Comments noted. See response to Policy RSA4. The site is not proposed to be extended.

Respondent (with lpr ref)	Response	Council Response
	Extension of allocation HSA3 to increase the extent of the allocation. See additional information that accompanies this submission.	No further changes to Policy SP13 are proposed.
Pro Vision for Rivar (lpr1633)	<p>Support policy.</p> <p><i>Full representation on behalf of Rivar Ltd. attached</i></p> <p>It is considered that developing the 'Land adjoining New Road, Newbury' is a developable option for the following reasons:</p> <p>a) There is a need to identify small/medium scale sites for housing in West Berkshire to meet the indicative housing requirements during the plan period.</p> <p>b) The site is located in the 'Newbury and Thatcham Area' which is capable of accommodating significant levels of growth given the range of services and facilities it currently offers and is therefore a sustainable location for development.</p> <p>c) The land has a strong relationship with the existing residential development to the north and follows the existing pattern of the settlement.</p> <p>d) The site is visually well contained by existing woodland and trees which affords a degree of separation from the wider landscape.</p>	<p>Comments noted.</p> <p>The allocation (RSA5) is proposed to be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p> <p>Policy SP13 to be amended to include the deletion of RSA5.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>e) An appropriate buffer (i.e. 15 metres) can be maintained to the Ancient Woodland.</p> <p>f) The site is not subject to any specific environmental or statutory designations such as Green Belt, Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI).</p> <p>g) The site is located in Flood Zone 1 (i.e. low probability of flooding) and a sustainable drainage system would be provided.</p> <p>h) The site has access to local employment opportunities within Newbury, Greenham and beyond;</p> <p>i) The site is in close proximity to local bus routes, and within walking distances of key facilities and services available. Future residents would therefore benefit from these existing services.</p> <p>j) A vehicular access and appropriate visibility splays can be delivered from New Road;</p> <p>k) The scale of dwellings proposed (i.e. around 10 new homes) is capable of delivering housing in line with local objectives, such as need for affordable housing.</p> <p>l) Further opportunity to deliver new areas of green infrastructure and the</p>	



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	<p>creation of areas of green amenity/open space for recreation, ecological and biodiversity enhancements.</p> <p>m) The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.</p> <p>n) The site is available for a residential development immediately. The land is within single landownership and Rivar have an option to purchase the site which will facilitate its timely development early in the plan period.</p> <p>o) Furthermore, as far as we are aware, there are no legal problems which would prevent this site coming forward for residential development.</p> <p>Accordingly, it is considered that there are no identifiable constraints that would prevent the delivery of the site for a small-scale residential development. The site is therefore suitable, available, and achievable for around 10 new homes, in a timely and sustainable manner.</p>	
Woolf Bond Planning for Donnington New Homes (lpr2100)	<p><i>Full representation on behalf of Donnington New Homes is attached.</i></p> <p>It is noted that this policy and supporting paragraph 6.21 commits to an identification of 40 dwellings through the Cold Ash Neighbourhood Plan process. Consistent with paragraph 6.21, it is understood that these will form an additional allocation to those identified for allocation within Policy SP 13 as proposed. For the reasons set out (<i>in full representation</i>) and in submissions made direct to the Neighbourhood Plan Group it is considered that our client's site at Ashmore Green Farm, Stoney Lane offers a deliverable and appropriate development opportunity to</p>	<p>The site 'Ashmore Green Farm, Stoney Lane' (CA1) has been assessed through the HELAA.</p> <p>The site is available and achievable.</p> <p>There are constraints which mean the site is unlikely to be suitable within the next 15 years - development would be inappropriate in the context of the existing settlement form and pattern.</p> <p>There are preferable sites elsewhere in Newbury and Thatcham, and includes those sites highlighted above with the benefit of planning permission, or with a resolution to approve.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>contribute towards a substantive proportion of the identified Cold Ash Neighbourhood Plan requirement.</p>	<p><u>Cold Ash Neighbourhood Plan</u></p> <p>The information published in the HELAA was at a point in time. As work has progressed on the LPR and more evidence has been gathered, some of the development opportunities we originally identified have changed. Some Neighbourhood Development Plan (NDP) steering groups have therefore found they are unable to allocate the housing numbers they have been given, and are looking to allocate sites in settlement boundaries instead, which is the case with Cold Ash.</p> <p>Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan does not include allocations within settlement boundaries because the principle of development is considered acceptable. Were NDPs in West Berkshire to include allocations within the settlement boundary, then this approach would be inconsistent with the approach taken in the Local Plan and draft emerging LPR.</p> <p>NDPs must meet a set of tests known as Basic Conditions, and one of these is that the policies in a NDP must be in general conformity with the strategic policies in a Local Plan.</p> <p>The site selection work undertaken by the Cold Ash NDP steering group has identified just one suitable site, and this site is located</p>

Respondent (with lpr ref)	Response	Council Response
		<p>within the settlement boundary. In light of this, the housing requirement for Cold Ash Parish will be amended to zero.</p> <p>No further changes to Policy SP13 are proposed.</p>
Pro Vision for Newbury Racecourse (lpr1682)	<p>Object to policy.</p> <p><i>Full representation and supporting documentation on behalf of Newbury Racecourse and promoting allocation of land south of Newbury Racecourse is attached.</i></p>	<p>The site 'Land south of Newbury Racecourse' (GRE3) has been assessed through the HELAA. There are constraints which mean the site is unlikely to be suitable within the next 15 years - a Landscape Sensitivity and Capacity Assessment concludes that the site has a low capacity for development due to the site being constrained by in a number of ways where any development would affect views and characteristics which would cause harm to the landscape. The Assessment therefore recommends that the site is not developed for housing.</p> <p>There are preferable sites elsewhere in Newbury and Thatcham, and includes those sites highlighted above with the benefit of planning permission, or with a resolution to approve.</p> <p>No further amendments to Policy SP13 are proposed.</p>
Southern Planning Practice Ltd for the Saunders Family (lpr1928)	<p><i>Full representation on behalf of the Saunders Family promoting development to the east of Stoney Lane is attached.</i></p> <p>It is pertinent to note the number of site allocations which are being carried forward from the current Local Plan. Whilst it is understandable that some sites will be included within the Local Plan Review, as they may have been forecast to be in the later years of the currently adopted Local Plan period, it is slightly concerning that main strategic allocation, Sandleford Park is being carried forward together with six of the existing site allocations. In fact, the Local Plan Review only proposes to allocate three new sites. These sites include a large strategic site at North East</p>	<p>Comments noted.</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. Sandleford Park has the benefit of outline planning permission for 1000 dwellings.</p> <p>The allocation of the Kennet Centre is no longer being progressed due to the location of the site within the settlement boundary. Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement</p>

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	<p>Thatcham, the redevelopment of the Kennet Centre and a small site for 10 dwellings on land adjoining new road.</p> <p>Sandleford Park has been allocated since 2006 yet but to date is yet to deliver any new homes.</p> <p>In 2006, Winchester City Council allocated a city site centre known as Silver Hill for redevelopment. However, due to the complexities involved in bringing such sites forward, this allocation has not progressed. It is considered that the same is likely to occur with the proposed allocation of the Kennet Centre which is likely to require the assembly of multiple landownerships before a viable scheme can be progressed.</p> <p>The proposed allocation of another strategic allocation plus the allocation of the Kennet Centre and the re-allocation of Sandleford Park results in an “all your eggs in one basket” approach is likely to result in a plan which has not been positively prepared and is unlikely to deliver the identified requirement.</p> <p>We consider that the council should be less reliant on major strategic allocations and look to allocate a range of additional small, medium and large sites to provide a more flexible, responsive and deliverable range of allocations. Such an approach is encouraged at Paragraph 68 of the National Planning Policy Framework which acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.</p> <p>By allocating more sites for housing development, the Council will bolster their housing land supply. Through the allocation of sites which link to existing allocations, the Council will achieve comprehensive development which will be far more beneficial, particularly around the urban areas, opposed to piecemeal development. We therefore encourage the Council to review their site allocations in line with their spatial strategy and together with the most recent objectively assessed</p>	<p>boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan will not include allocations within settlement boundaries because the principle of development is considered acceptable.</p> <p>No further changes to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	housing need to ensure they are planning for the right homes in the right places over the plan period and beyond.	
Pro Vision for Mr and Mrs Mathew Pittard (1962)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached.</i></p> <p>Draft policy SP13 sets out the sites allocated for residential and mixed-use development in the Newbury and Thatcham spatial area. Site allocations totalling 4,825-4855 new homes, plus 24 plots, are proposed within the spatial area, compared with the overall requirement outlined in policy SP12 of 8,840-9,775 new homes over the Plan-period.</p> <p>9 out of 13 of the allocations in the spatial area, including Sandleford Park, are existing allocations that the Council proposes carrying forward into the next Local Plan.</p> <p>Paragraph 3.6 of the Site Selection Background Paper (December 2020) explains that “<i>The contribution to housing supply from existing allocations has been reviewed to take account of changes in capacity and reassessment of site deliverability in the light of progress since original allocation.</i>” It goes on to note that “<i>Section 9 of this background paper provides an update on the deliverability of the Core Strategy and HSA DPD sites, and identifies which allocations will be rolled forward into the LPR.</i>”</p> <p>Paragraph 9.3 explains that “<i>The promoters of all of the sites allocated in the Core Strategy and HSA DPD were contacted in the summer of 2020 for an update on deliverability.</i>” Paragraphs 9.3 and 9.4 confirm that the existing allocations have been subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and it was concluded that “<i>all sites will have either a predominantly neutral effect or positive effect.</i>” Furthermore, paragraph 9.4 notes that “<i>The existing</i></p>	<p>The site ‘Land at Lower Way Farm, Thatcham’ (THA9) has been assessed through the HELAA and also subject to more detailed site selection work.</p> <p>The Core Strategy was clear that Thatcham was to receive a lower allocation than other Urban Areas given the rapid expansion that had taken place in the town over recent years. This was to allow a period of consolidation, ensuring the infrastructure and town centre facilities could be upgraded to meet the demands of the existing population. In reviewing the vision for Thatcham as part of the Local Plan Review, and to best understand how to plan for growth in Thatcham within the plan period, the Council commissioned masterplanning work.</p> <p>The masterplanning work considered all of the HELAA sites promoted in Thatcham as well as other evidence studies produced for the LPR. It identified that only growth of a strategic scale could support the service provision and regeneration that Thatcham requires. The indicative development potential at THA9 is 36 dwellings. The development potential at other sites in Thatcham is far greater. The masterplanning work recommended that if strategic development were to occur in Thatcham, the most appropriate location would be north east Thatcham.</p> <p>There are concerns that development may reduce the open countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way. The site is a buffer to development and forms part of the open character along this side of Lower Way. There is further concern that development would</p>

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	<p><i>allocations have not been subject to site assessment because the principle of development has been accepted through the adoption of both the Core Strategy and HSA DPD. In addition, the majority of allocations have grant of planning permission.”</i></p> <p>The West Berkshire Core Strategy was adopted in July 2012 while the Housing Site Allocations Development Plan Document (DPD) was adopted in May 2017. As these documents were adopted some time ago, the Council's decision not to carry out a site assessment of the retained allocations as part of the Local Plan Review does not appear to be a robust approach. Furthermore, it seems unlikely that such an approach would comply with the tests of soundness set out in paragraph 35 of the NPPF, particularly in relation to the Plan being justified and effective.</p> <p>Without this evidence, it is not clear how the Council is able to determine that the Local Plan is “<i>an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence</i>” (justified) and “<i>deliverable over the plan period</i>” (effective).</p> <p>While the principle of the development of these sites has previously been established, they have not been delivered (in full or in part) in line with the Council's original housing trajectory. The Site Selection Background Paper – and the Council's evidence base as a whole – do not explore the reasons for this. The Council's “<i>Deliverability update</i>” is wholly insufficient, merely comprising a limited number of bullet points for each site. Further justification, alongside evidence, is therefore required to achieve a sound Plan.</p> <p>The planning context, alongside the local environment, has changed significantly since the existing allocations were made. It is therefore also necessary to confirm that the previous allocations remain the most sustainable options for the future growth of the District, to ensure that the Local Plan is “underpinned by relevant and up-to-date evidence” as</p>	<p>not be appropriate in the context of the existing settlement form, pattern and character of the landscape.</p> <p>Development would have a significant impact on education provision in Thatcham. It is the preference of the Council's Education Team that there is a scale of housing (either from a single or a number of developments) that can yield new secondary provision.</p> <p>No further amendments to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>required by paragraph 31 of the NPPF. Simply because the Council consider that an existing allocation remains deliverable does not mean that it should automatically be carried forward without taking account of the passage of time, changing circumstances and the current built and natural environment. That is not to say that the retained allocations are not suitable, but without the evidence, it simply cannot be determined.</p> <p>The onus is on the Council to demonstrate that all allocations in the Local Plan Review (existing and proposed) are deliverable. In this context, it is particularly relevant to note that the PPG(14) explains that in considering all reasonable alternatives, it is necessary to employ the same level of detail for each alternative option. As each new allocation benefits from a detailed site assessment in the Site Selection Background Paper, based on the latest evidence, it is also necessary for the same detailed site assessment, based on the latest evidence, to apply to the retained allocations. As this is currently missing, it is not possible to make a comparison between the options for development and confirm the suitability and deliverability of both the retained and proposed allocations.</p> <p>Paragraph 6.19 of the draft Local Plan confirms that two strategic urban extensions are proposed to meet the majority of housing need (approximately 4,000 homes) in the spatial area. These involve approximately 1,500 homes at Sandford Park to the south of Newbury(1,000 within the Plan-period), and approximately 2,500 homes to the north east of Thatcham (1,250 within the Plan-period), as identified in policy SP13.</p> <p>For the reasons outlined below in response to policy SP16 and SP17, we do not consider that these allocations are sound. We recommend that the allocation at Sandford Park is removed, or at the very least, the amount of housing that it is anticipated will come forward within the Plan-period is reduced significantly. Furthermore, we recommend that the</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>amount of housing that it is anticipated within the Plan-period on land to the north east of Thatcham, is, at the very least, reduced significantly.</p> <p>As noted in response to policy SP12, a housing trajectory is not included in the draft Local Plan or its evidence base. Therefore, at present, it is not clear whether the draft Local Plan and its allocations are an appropriate basis for planning for the future of the District, or deliverable within the Plan-period.</p> <p>In light of the above, we recommend that additional sites should be allocated for housing, focused on small / medium sized sites that can come forward quickly, particularly in the early part of the Plan-period. This will provide additional flexibility, ensuring that decisions regarding new development can remain Plan-led and land is brought forward at a sufficient rate, in line with the NPPF.</p> <p>(14) NPPG: Paragraph: 018 Reference ID: 11-018-20140306</p> <p>Changes sought:</p> <p>We recommend that the allocation at Sandford Park is removed, or at the very least, the amount of housing that it is anticipated will come forward within the Plan-period is reduced significantly.</p> <p>we recommend that the amount of housing that it is anticipated within the Plan-period on land to the north east of Thatcham, is, at the very least, reduced significantly.</p> <p>We recommend that additional sites should be allocated for housing, focused on small / medium sized sites that can come forward quickly, particularly in the early part of the Plan-period.</p>	



Respondent (with lpr ref)	Response	Council Response
Pegasus Planning for Donnington New Homes (lpr1945)	<p><i>Representation on behalf of Donnington New Homes in support of continued allocation of Sandleford Park</i></p> <p>This Policy is <u>supported</u>; however, the supporting text should be amended to clarify the existing status of Sandleford Park. The text '<i>..a greenfield site to the south of Newbury, already allocated in the Core Strategy</i>' should be replaced with, '<i>.....<u>the existing Core Strategy allocation at Sandleford Park, south of Newbury, which is carried forward with a redefined policy boundary....</u></i>'. This amended text provides greater clarity around the existing status of the site and the Council's intentions regarding the extent to which the allocation applies to land.</p>	<p>Sandleford has the benefit of outline planning permission for 1000 dwellings and 80 extra care units.</p> <p>Agree that the suggested wording more readily reflects the existing allocation in the Core Strategy.</p> <p>Amend Policy SP13 to say <i>.....<u>the existing Core Strategy allocation at Sandleford Park, south of Newbury, which is carried forward with a redefined policy boundary...</u></i> in para 6.19.</p>
Royal & Sun Alliance Insurance PLC (lpr2113)	<p><i>Full representation on behalf of Royal &amp; Sun Alliance Insurance promoting residential development at Greenham Road Retail Park is attached.</i></p>	<p>The site at Greenham Road Retail Park (site ref NEW12) has been assessed through the HELAA. The HELAA concludes that the site is 'potentially developable'.</p> <p>The site is not being proposed for allocation as it is located within the settlement boundary. Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan will not include allocations within settlement boundaries because the principle of development is considered acceptable.</p> <p>No further changes to Policy SP13 are proposed.</p>
TOWN for Pincent's Lane (lpr2121)	Object to policy.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>Full representation promoting land to East of Pincent's Lane, Tilehurst attached .</p> <p>The spatial strategy of focusing development on existing centres as the most sustainable locations for growth is noted. However, West Berkshire is not an island, and the presence of Reading as a significant location for jobs and higher order services is as a result significantly underplayed. An increased focus for development in the Eastern Area close to Reading is needed to address this. A more sustainable pattern of growth as a whole could be achieved whilst still retaining the individual identities of the settlements within the Eastern Area.</p> <p>In the case of Thatcham, the Emerging Draft plan suggests only development at a strategic scale of a sustainable urban extension (SUE) will support the service provision and regeneration that Thatcham requires. Delivery of “at least 1,250 dwellings is anticipated within the plan period.”</p> <p>However, this timescale seems bravely optimistic. There is plenty of evidence<sup>1</sup> that large SUEs take much longer to plan and deliver – and this has certainly been borne out locally by the experience at Sandford Park.</p> <p>A realistic programme for delivery of housing in a new SUE at Thatcham, allowing for no infrastructure or other barriers to growth and accepting the Council’s bravely optimistic timescale for adoption of the Local Plan review of 2022, is set out in table 3 (in full representation):</p> <p>Assuming that the above timelines can be met, a ‘reasonable best case’ delivery trajectory for the proposed NE Thatcham SUE during the remaining plan period is set out in Table 4 (in full representation, suggesting best case delivery of 700 units in plan period).</p>	<p>The Council’s strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR. The allocation for North East Thatcham has been reduced to 1500 dwellings, to be delivered in the plan period.</p> <p>For Sandford, see responses to Policy SP16. The principle of development on the site for up to 2000 dwellings has been established through the Core Strategy process. The site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site. The site will remain in Policy SP13.</p> <p>There are a significant number of constraints within the Eastern Area, meaning that provision for new development is more limited. Nonetheless several sites are proposed for allocation within the Eastern Area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The suggested trajectory above would be typical of market-led approach to delivering a major SUE such as that proposed. Even with 2,500 units to be delivered, a maximum of four outlets would not be seen until well into the delivery period and each developer would not expect to deliver more than around 0.8 units per week. Where less competition exists then delivery would be expected to be around, or slightly above, one unit per week (see references in footnote 1, p.4 of <i>full representation</i>).</p> <p>Given these factors, it is our view that it would be extremely unwise for the Council to rely on the delivery of more than an absolute maximum of <b>750</b> units at North East Thatcham during the plan period.</p> <p>Furthermore, it should be noted that the Emerging Draft Plan relies on the delivery of 1,000 units at Sandleford Park during the Plan Period. The experience in recent years would suggest that this is another bravely optimistic assumption by the Council.</p> <p>These factors, together with the likely need to meet additional unmet demand arising in Reading, suggest the need for an increased reliance on small and medium sized sites across the District – and in particular in the Eastern Area. Such sites need to be of a sufficient size to deliver community infrastructure and other benefits such as affordable housing. Many brownfield sites in particular are too small to deliver these benefits – as well as attracting additional costs in the form of demolition, clean-up and other infrastructure challenges.</p> <p>Changes sought:</p> <p>SP13 relies overly on large strategic allocations which are highly unlikely to deliver to the numbers projected within the Plan Period. SP13 should make greater provision for growth to accommodate these factors and to benefit from the proximity to the Reading urban area.</p>	<p>No further amendments to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
JSA Architects Ltd for Colthrop Village Consortium (lpr743 and 773)	<p>Object to policy.</p> <p>The Colthrop Village Consortium do not disagree with the overall housing figure but they consider that the proposed urban extension to North-East Thatcham is flawed for the reasons set out in the letter prepared on their behalf by JSA Architects dated 4 February 2021 along with the associated Technical Note prepared by Stuart Michael Associates on Transport.</p> <p>The HELAA is factually incorrect in regard to THA1 and does not apply criteria consistently where THA20 is deemed to have major constraints and is recorded as "Suitability Unknown" and yet is progressed to be assessed against availability, deliverability and achievability. The Colthrop Consortium's site Ref. THA1 was rejected too readily and on factually incorrect information. See JSA Architects letter on behalf of the Consortium setting out the detail of their objections to the current draft Local Plan, dated 4 February 2021.</p> <p>Changes sought:</p> <p>A reappraisal of the THA1 site and a correction of the factually incorrect and misleading comments in the current version of the HELAA.</p> <p>Look again at the Rainsford Farm/former Colthrop Paper Mill Site which, although partly within the flood plain, is in proximity to the station and is sequentially preferable to parts of the proposed North-East Thatcham allocation which are not appropriate for the proposed development.</p>	<p>Comments noted.</p> <p>Significant parts of the site are located within Flood Zones 2 and 3, and this will limit the developable area. The presence of high voltage power lines and high risk of contamination further limit the developable area. There is no evidence to the contrary to this HELAA assessment. The Highways Authority comment that the impact of the development will be overwhelming and unacceptable on the level crossing, Thatcham and Crookham Hill. Furthermore, a single point of access is unacceptable for a development of this size. There is no firm evidence that a bridge over the railway line and the closure of the level crossing could be delivered, and would be viable, particularly given the restraint on the potentially developable area outside of the constraints listed above.</p> <p>The site is not proposed for allocation and no changes are necessary to the policy.</p>
Turley for Commercial Estate Group (lpr2359)	<p>Support policy.</p> <p>Broadly agree.</p> <p>CEG generally supports the Council's strategic objective for housing and the approach to housing delivery in so far as it seeks to provide sufficient</p>	<p><u>Housing and the approach to housing delivery:</u></p> <p>Support for approach noted.</p> <p><u>Local Development Scheme / LPR timeframe:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>housing to meet identified needs whilst not curtailing the delivery of housing throughout the plan period (i.e. the housing figure is neither seen as a ceiling or a cap to development). This ensures that the plan provides flexibility and largely meets the requirements of the National Planning Policy Framework (The Framework).</p> <p>The Local Development Scheme currently envisages adoption in December 2022 but there are recent experiences where the Examination process has taken considerably longer than envisaged. Given the local plan are supposed to have a 15-year time horizon from adoption CEG consider that this emerging Local Plan should have an end date of 2038 rather than 2037 to build in some flexibility from the outset. This would require an additional year's worth of housing land to be identified, especially on the edge of sustainable settlements.</p> <p>Concern exists, however, about the Council's rigid approach to the allocation of sites for development. In particular the heavy reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandleford Park and evidenced through consultant papers such as the 'Start to Finish' Report 2nd Edition prepared by Lichfields).</p> <p>In the absence of a Housing Trajectory within the documentation or Appendices CEG therefore reserve the right to make more detailed comments on the delivery and lead in time of strategic sites at a later stage.</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing</p>	<p>The Local Development Scheme as published indicates that the LPR will be submitted in March 2023 with adoption in September 2024. The LPR end date has been amended to 2039.</p> <p>The housing land supply, and housing trajectory has been updated to reflect the plan period and plan end date.</p> <p><u>Reliance on strategic sites:</u></p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandleford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandleford Park site.</p> <p><u>Flexibility:</u></p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met. The upper end of the range has been proposed to allow for approximately 5% additional homes.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner. Directing such to sustainable settlements would accord with the current spatial strategy.</p> <p>One example of this is the land to the North of Newbury. Part of the land benefits from planning permission for up to 401 dwellings, a local centre and a primary school and work has commenced to implement that permission. There is the opportunity for further housing to occur which would capitalise upon these new social and community facilities. Additional land in this location was covered by the Environmental Statement (ES) which was submitted in support of the application but did not form part of the development scheme itself. The ES demonstrated that the additional land was suitable for future development to assist in meeting the Council's housing needs in a location which is sustainable and where there are limited constraints to development.</p> <p>The Council's own assessment of the wider site within the HELAA (December 2020) stated that this site is well related to Newbury and that it should be considered as part of a future potential strategic site. The Council has accepted that the site is suitable for development and in positively preparing the plan should be considering the positive contribution that a flexible approach to additional housing in locations, such as North Newbury, can make to ensuring that the plan meets its objectives. This would align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Changes sought:</p> <p>Consideration should be given within Policies SP13 -15 to identifying additional sites to provide more flexibility for the plan to deliver the</p>	<p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p><u>Land north of Newbury:</u></p> <p>The land north of Newbury site has planning permission, and is currently under construction. The outstanding dwellings to deliver have been factored into the housing supply.</p> <p>As dwellings are under construction, with houses being actively marketed, it is not considered necessary to allocate the land for residential development. The settlement boundary would be reviewed to encompass the land, and will be consulted on as part of the consultation exercise for the submission version of the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site.</p> <p>No further amendments are proposed to Policy SP13.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>identified housing numbers (including up-to 2038), as a minimum, and to ensure that any delays to the delivery of large strategic sites does not adversely impact on the Council's ability to meet their housing needs. The contribution that the CEG's site at North Newbury can make, to both housing delivery and infrastructure provision (i.e. links between the A339 and B4009), should carry significant weight and means that it should be formally allocated for residential purposes. Such an allocation would accord with the spatial strategy and the available technical evidence concerning the site's suitability for development.</p> <p>For the avoidance of doubt, the extent of the proposed allocation is identified on the accompanying plan</p>	
West Build Homes (lpr2135)	<p>Westbuild broadly support the Council's approach to the delivery of housing set out within Policy SP12, but have some reservations about specific matters which are set out below.</p> <p>Significant concern exists, however, about the Council's over-reliance on two large strategic sites. The Council's own experience, and that on a national level, is that strategic sites have lengthy lead-in times, and are inherently slow in delivery, and this should be reflected within the emerging plan review through the inclusion of criteria for sites not proposed for allocation to be considered, increasing the flexibility afforded to the Council and reducing the reliance upon strategic sites.</p> <p>Paragraph 6.10 of the draft emerging plan refers to paragraph 68 the National Planning Policy Framework (The Framework) and the weight that should be attributed to the benefits of using suitable sites within existing settlements for homes. What it fails to have any regard to,</p>	<p>Support for approach noted.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable more settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>however, is the sub section <b>Paragraph 68(d)</b> which states that local planning authorities should:</p> <p><i>“work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”</i></p> <p>Westbuild contends that without reference to the part of the Framework, and the inclusion of such provisions within the proposed policies, the plan is flawed in its approach and does not fully meet the tests of soundness.</p> <p>Changes sought:</p> <p>Policies SP13 -15 should be amended to provide the potential for additional sites to come forward within the plan period and to ensure that any delays to the delivery of the large strategic sites is mitigated.</p>	<p>There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site.</p> <p>The site allocations set out in SP13-15 are based on the evidence base including the HELAA.</p> <p>No further amendments are proposed to Policy SP13.</p>
Carter Jonas for C Graham (lpr2142)	<p>Object to policy.</p> <p>The land at Henwick Manor, Tull Lane, Newbury is not allocated for residential development. (THA18 of the HELAA)</p> <p>The site amounts to 4.9ha and is currently in agricultural use. The site is accessed from Tull Lane to the east and has a gentle slope down from west to east. The site is in flood zone 1 with a low probability of flooding.</p> <p>There is no known contamination or protected species on the site but further investigation can be carried out as required.</p> <p>There is a public right of way footpath along part of the western boundary, and Lower Henwick, Farmhouse and Barns are Grade II listed and are located to the south west of the site. A development scheme</p>	<p>Comments noted.</p> <p>The HELAA concludes that there are constraints which mean the site is unlikely to be suitable within the next 15 years - the site has a distinctive open character, contributing greatly to the open countryside between Newbury and Thatcham. Site relatively flat but Tull Way increases in height away from the A4. Development would have an adverse impact on the existing settlement form, pattern and character of the landscape.</p> <p>Further evidence has been prepared in the form of the ‘Appropriate Countryside Designation Study’. This study recommends the safeguarding of open land around Newbury and Thatcham.</p> <p>No further amendments to Policy SP13 are proposed.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>could be designed to protect the setting of the listed buildings. There are no planning designations that impact the development of the site.</p> <p>The HELAA 2020 notes that the “Council's Highways Team would consider that there would be some impact on Tull Way and the A4 / Tull Way Roundabout. They would not anticipate that the impact would be severe, but a Transport Assessment with modelling using the Thatcham VISSIM would need to be submitted in the usual way to assess the impact.” A Transport Assessment can be carried out in due course, but it not envisaged that there would be any insurmountable issues.</p> <p>The site could be delivered on its own or part of a larger site alongside the land promoted to the south west (THA13).</p> <p>The site is available immediately and could deliver in the order of 100-110 dwellings.</p> <p>Changes sought:</p> <p>Allocation of land at Henwick Manor for up to 110 dwellings.</p>	
Thames Water (lpr2148)	<p><i>Full representation and supporting documentation by Thames Water, as landowner promoting land east of Hill Road, Speen, is attached.</i></p> <p>Given that large sites at Newbury and Thatcham that were allocated in the Core Strategy and HSADPD (including the 2,000 home allocation at Sandleford Park) have been delayed in coming forward it is important therefore that this shortfall is addressed. The allocation of the sustainably located KPL site at Speen would help address this shortfall in line with the spatial strategy in Policy SP 1 and should be allocated accordingly.</p> <p>Changes sought:</p> <p>The allocation of the sustainably located KPL site at Speen.</p>	<p>The site at Hill Road, Speen has been assessed through the HELAA (SPE2). The HELAA concludes that the site is unlikely to be suitable within the next 15 years - Council's Highways Team has concerns over safe access to the site due to gradient and sight lines and does not support development.</p> <p>There are preferable sites elsewhere in Newbury and Thatcham, and includes those sites highlighted above with the benefit of planning permission, or with a resolution to approve.</p> <p>It is considered that the Council is allocating an adequate number of sites to meet its requirement.</p>

Respondent (with lpr ref)	Response	Council Response
		No further amendments to Policy SP13 are required.
Savills for Englefield Estate Office (lpr1530)	<p><u>Policies SP13 – SP15: Sites allocated for residential development in Newbury and Thatcham, Eastern Area and North Wessex Downs AONB</u></p> <p>LPR paragraph 6.12 identifies a need for an additional 1,661 dwellings to 2037, taking into account existing commitments for 8,114 dwellings. Notably this includes 1,000 dwellings at Sandford Park, which was allocated in 2012 and has been twice refused planning permission, most recently in October 2020, and so it is questionable whether 1,000 dwellings will be delivered on the site during the LPR plan period. In total over 3,000 dwellings which are identified to support future housing supply are at sites currently without planning permission. As such it is considered that an additional supply of housing is likely to be required in the LPR, above the stated requirement of 1,661 dwellings, and this should be met through smaller sites distributed throughout the District to avoid similar delays to that experienced at Sandford Park. It is important therefore that the LPR therefore identifies a sufficient supply of deliverable sites to meet the local housing target, taking into the previous shortfall in delivery and the potential that identified sites do not come forward as envisaged.</p> <p>It is noted that draft LPR Policies SP13-SP15 make provision for 3,010 new dwellings in excess of the stated outstanding requirement for 1,661 dwellings. However, it is crucial that the LPR is subject to ongoing monitoring to ensure that sufficient housing is being delivered in light of the above, and particularly given the reliance on the strategic allocation for 2,500 dwellings at North West Thatcham.</p> <p>The LPR (paragraph 6.22) acknowledges that Grazeley has been identified as a possible location for a new garden settlement, but is not currently proposed as a strategic allocation due largely to the extension of the DEPZ. As noted above, the extension of the DEPZ is subject to review (the outcome of which is not yet known) and indeed LPR paragraph 4.47 notes that the DEPZ may be subject to change in the</p>	<p>Comments noted.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandford Park site.</p> <p>No further amendments to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>future. In light of this, and given the significant benefits that this location could bring to the housing and development needs of the area, the LPR should include reference to the on-going cross-Authority support for a new settlement at Grazeley, subject to overcoming this constraint, and the position should be kept under review. Should the DEPZ change, a review of the LPR should be undertaken to include consideration of development at Grazeley.</p> <p>The NPPF also emphasises that small and medium sites <i>'can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly'</i> (paragraph 68). Indeed the Estate's landholdings across the eastern part of the district include a number of small and medium land parcels (as noted further below) which are suitable to accommodate sustainable development and contribute to the district's housing land supply. This includes the Estate's land at Burghfield Common, Theale and Mortimer as noted further below. A number of these sites are currently located within the DEPZ, however should this change during the plan period (as noted above) and additional housing be required, these sites are well placed to accommodate this need.</p>	
<p>Pegasus Planning for Newbury &amp; Crookham Golf Club (lpr2056)</p>	<p>Object to policy.</p> <p>The policy lists a number of sites of varying sizes, which are proposed to be allocated for residential development. Irrespective of the current planning position, it is considered that some of these sites are less ideally suited or justified than that proposed at Newbury and Crookham Golf Club (NCGC). In particular, the following:</p> <ol style="list-style-type: none"> <li>1. Coley Farm, Stoney Lane, Newbury – 75 dwellings</li> <li>2. Lower Way, Thatcham – 85 dwellings</li> <li>3. New Road, Newbury – 10 dwellings</li> </ol> <p>All of these sites are small and currently in use as open fields. Although they each adjoin the edge of the settlement, they offer very limited</p>	<p>Comments noted.</p> <p>Planning permission now exists for Coley Farm and there is a committee resolution to approved Lower Way subject to a Section 106 Agreement. It is no longer proposed to allocate the 10 dwellings at New Road, Newbury.</p> <p>The site at the Newbury and Crookham Golf Club (GRE11) has been assessed through the HELAA, and this concludes that there are constraints which mean the site is unlikely to be suitable within the next 15 years - there are access issues and the site is not supported by the Council's Highways Team.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>opportunities for landscaping, as well as biodiversity and geodiversity net gain. The plans in the local plan show a c.95% development coverage with a narrow “landscaped buffer” on the site edges. These sites are less suitable for allocation and are poorer choices for new housing to help meet the local need in the next few years than that proposed at NCGC.</p> <p>In contrast, the 2 hectares of land at NCGC, is relatively flat with no long distant views. It is well-screened and fully enclosed by existing woodland, both around the development parcel and at site boundaries and there are considerable opportunities available to provide a landscape-led scheme that will enhance and improve the visual amenity of the local area and at least 10% bio and geodiversity net gain. Use of land owned by the golf club to enhance the natural environment on the edge of Newbury, as part of a modest development of c.35 family houses, will lead to considerable improvements to the amenities, wellness and mental health of both existing, and future, local residents.</p> <p>In its current form, it is therefore considered that Policy SP13 has not allocated sufficient sites to help meet the District-wide shortfall of 1,661 dwellings identified in the Local Plan. The allocations identified are also considered to be sequentially inferior to that at NCGC, whilst providing less quantifiable benefit in terms of meeting other policy aspirations of the Local Plan relating to support for the rural economy (in this regard, please also see our additional comments against Policy DC32).</p> <p><i>Policy SP13 – Sites allocated for residential and mixed-use development in Newbury and Thatcham is Objected to, because a number of the proposed allocations are considered to be less suitable than land at NCGC, which also needs to be included in the list of larger sites (1ha or larger) for the allocation of c.35 dwellings.</i></p> <p>Changes sought:</p>	<p>There are preferable sites elsewhere in Newbury and Thatcham, and includes those sites highlighted above with the benefit of planning permission, or with a resolution to approve.</p> <p>It is considered that the Council is allocating an adequate number of sites to meet its requirement, meeting its Local Housing Need requirement.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>Should the Council consider the representations made in support of allocation of land at NCGC for residential development to have merit, NCGC respectfully suggest the following policy wording:</p> <p><b>Policy RSA XX – Land at Newbury and Crookham Golf Club, Greenham, Newbury (Site Ref: GRE10 and GRE11)</b></p> <p><i>The site, as identified on the indicative map, has a developable area of 2 hectares and is proposed to be allocated for residential development comprising c. 35 dwellings, made up primarily of family-sized homes.</i></p> <p><i>Development will be delivered in accordance with the following parameters:</i></p> <ol style="list-style-type: none"> <li><i>1. The provision of c.35 dwellings will be developed at a mass and density that reflects the character of the adjoining settlement.</i></li> <li><i>2. The site will be developed in accordance with the Landscape Sensitivity Assessment (2011).</i></li> <li><i>3. The design and layout of the development will be further informed by a full detailed LVIA as required by policy SP8.</i></li> <li><i>4. The scheme will provide significant Green Infrastructure improvements in accordance with policy SP10.</i></li> <li><i>5. The scheme will include at least 10% bio and geodiversity net gain in accordance with policy SP11.</i></li> <li><i>6. The scheme will be supported by an extended phase 1 habitat survey, together with further detailed surveys arising from that as necessary.</i></li> <li><i>7. The scheme will be informed by a FRA, which will advise on any necessary flooding and drainage mitigation measures.</i></li> <li><i>8. A Transport Assessment will be required to establish the appropriate locations for access onto the wider road network and to ensure appropriate measures are put in place to mitigate impacts on the highway network.</i></li> </ol>	

Respondent (with lpr ref)	Response	Council Response
	<p>9. <i>As the proposal is 'enabling' development, a section 106 agreement will be required to ensure that capital released by the development is only spent on the redevelopment of the CPGC clubhouse and other improvements to the golf course to improve its long-term viability.</i></p> <p>10. <i>A Viability Report will be required to identify the level of affordable housing capable of being supported by the enabling residential development.</i></p>	
Lochailort Newbury Ltd (lpr2039)	<p>Changes sought;</p> <p>To ensure consistency across policies, the table at draft Policy SP13 should be amended in respect of site RSA1 to read "400-500" rather than "250".</p>	<p>Comments noted.</p> <p>The LPR proposed for allocation the Kennet Centre for a mixed use development comprising of approximately 250 dwellings. Separate to the LPR, two planning applications have been submitted for the site – one of the applications (ref: 21/00379/FULMAJ) proposes a phased redevelopment for a flexible-use commercial spaces, a headquarters office building, and 381 dwellings. The second application (ref: 21/00380/FUL) proposes 91 retirement living apartments in lieu of the office building in the first application.</p> <p>It is no longer proposed to allocate the Kennet Centre as the site is located within the settlement boundary. Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable. The LPR will not include allocations within settlement boundaries.</p>

Respondent (with lpr ref)	Response	Council Response
Pro vision for CALA Homes (lpr2364)	<p>Rep made in reference to Land at Waller Drive, Newbury (CA10 HELAA reference), part of wider representation. The site is bisected by the Cold Ash Parish Boundary and within the settlement boundary. The site is previously developed and operating as a mixed use commercial site, including scrap yard and slaughter house.</p> <p>It is noted that for Cold Ash, the LPR is deferring to the emerging Neighbourhood Plan to identify 40 new homes (draft policy SP13 and paragraph 6.21).</p> <p>As noted in the first section of this representation (<i>SP1 reps</i>), the site is dissected by the parish boundary, and is entirely within the settlement boundary of Newbury. Therefore, its spatial planning relationship is clearly with Newbury rather than Cold Ash – i.e. a site in one of the district's main urban centres, rather than part of the rural area, with two quite different built environment contexts. In which case, a site allocation would be appropriate in the LPR rather than the Neighbourhood Plan.</p> <p>Allocation in the LPR would be in line with the proposed strategy to direct development to the main settlements, principally Newbury. Inclusion in the LPR would also provide greater certainty over delivery of the site compared to the neighbourhood plan process, which is not guaranteed to proceed through referendum to adoption.</p> <p>Furthermore, we have reservations that that procedure would allow allocation of this land in as it is at least partially outside the designated Neighbourhood Plan Area (which follows the parish boundary).</p>	<p>The site at Waller Drive, Newbury (CA10) has been assessed through the HELAA. The HELAA conclusion for the site is that it is 'potentially developable'.</p> <p>The information published in the HELAA was at a point in time. As work has progressed on the LPR and more evidence has been gathered, some of the development opportunities we originally identified have changed. Some Neighbourhood Development Plan (NDP) steering groups have therefore found they are unable to allocate the housing numbers they have been given, and are looking to allocate sites in settlement boundaries instead, which is the case with Cold Ash.</p> <p>Settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan does not include allocations within settlement boundaries because the principle of development is considered acceptable. Were NDPs in West Berkshire to include allocations within the settlement boundary, then this approach would be inconsistent with the approach taken in the Local Plan and draft emerging LPR.</p> <p>NDPs must meet a set of tests known as Basic Conditions, and one of these is that the policies in a NDP must be in general conformity with the strategic policies in a Local Plan.</p> <p>The site selection work undertaken by the Cold Ash NDP steering group has identified just one suitable site (Land at Waller Drive,</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Newbury), and this site is located within the settlement boundary. In light of this, the housing requirement for Cold Ash Parish will be amended to zero.</p> <p>No further amendments to Policy SP13 are proposed.</p>
LRM Planning for Bloor Homes & Sandford Farm (lpr2357)	<p><i>Representation promoting the allocation of land south of Gorse Covert, Sandford (GRE2) attached.</i></p>	<p>The site at land south of Gorse Covert, Sandford (GRE2) has been assessed through the HELAA.</p> <p>The site is potentially available and achievable.</p> <p>There are constraints which mean the site is unlikely to be suitable within the next 15 years - development would be inappropriate in context of settlement form, pattern and character of the landscape.</p> <p>There are preferable sites elsewhere in Newbury and Thatcham, and includes those sites highlighted above with the benefit of planning permission, or with a resolution to approve.</p> <p>No further amendments to Policy SP13 are proposed.</p>
Gerald Eve LLP for Fairhurst Estate (lpr2371)	<p>Object to policy.</p> <p>Our client owns and controls land situated to the East of Shaw Farm Road, Newbury. A site location plan of this land is included at Annex 1 (<i>attached</i>). The land would be accessed from the roundabout adjacent to the Vodafone Headquarters as an extension to the already permitted housing development, and would not rely upon vehicular access from Shaw Farm Road/Love Lane itself.</p> <p>We share the concerns of others in respect of the approach to the identification and allocation of sites for development. In particular the</p>	<p>The site to the east of Shaw Farm Road, Newbury (SCD4) has been assessed through the HELAA. The HELAA concluded that the site is 'potentially developable in part'. The site was subject to more detailed site selection work which did not recommend the site for allocation. Access via The Connection, a private road, seriously inhibits development of site. Highway Officers consider that a route through site CA15 to the B4009 would need to be provided. Development of this site should be considered as part of a future potential strategic site to the north of Newbury in order to ensure the most sustainable outcomes. Development would require access from the B4009 to the A339. A further strategic site</p>



Respondent (with lpr ref)	Response	Council Response
	<p>heavy reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandford Park and evidenced through background papers such as the 'Start to Finish' Report prepared by Lichfields).</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner.</p> <p>The Council's own assessment (within the HELAA (December 2020) of the wider area, within which the land is situated, stated that it is well related to Newbury and that it should be considered as part of a future potential strategic site (site reference SCD4). The Council has accepted the principle that the general location is suitable for development and, in positively preparing the plan, should be considering the positive contribution that a flexible approach to additional housing in locations such as this can make to ensuring that the plan meets its objectives. This would align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Changes sought:</p> <p>Further consideration of the whole site assessed as SCD4 within the HELAA should be undertaken. The site, as shown within SCD4, and specifically including the area as identified on the enclosed plan, merits further investigation and consideration for inclusion as a suitable site for the delivery of additional new homes.</p>	<p>at Newbury would be a consideration for a future review of the Local Plan.</p> <p>No further amendments to Policy SP13 are proposed.</p>
Barton Willmore for Sulham Estate (lpr2442)	Object to policy.	The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and

Respondent (with lpr ref)	Response	Council Response
	<p>Disagree with the reliance on large sites.</p> <p>23% of the Council's supply of dwellings is anticipated to be delivered from Sandlesford Park (1,000 dwellings) and North West Thatcham (1,250 dwellings). Whilst the principles of delivering large sites with accompanying infrastructure is supported by national planning policy, and we do not object to these allocations, we raise concern that the numbers suggested may not be delivered within the plan period. In particular with these large allocations, substantial infrastructure will need to be delivered prior to any housing delivery. Increased small and medium scale sites would complement these larger sites by ensuring a constant stream of delivery whilst larger sites start to mobilise. Hall Place Farm, Tilehurst (TIL18) which would deliver approximately 80 dwellings is the scale and location of site which the Council should be seeking to allocate. Due to the medium scale of development and edge of settlement location, the site can be delivered in the short to medium term utilising existing infrastructure including public transport, schools and local shops.</p> <p>The need for further small/medium sized sites to compliment the delivery of larger sites is also compounded by the need for an increased housing target and the necessity for further allocations in order to meet this target. Please refer to the Housing Need Technical Note which accompanies these representations for greater detailed justification and reasoning as to why the housing target figure is insufficient.</p> <p>Changes sought;</p> <p>Further sites small and medium sized sites should be allocated to ensure that any delays to delivery of larger allocations do not undermine the Council's delivery of sufficient housing across the plan period.</p>	<p>smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandlesford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandlesford Park site.</p> <p>The site 'Hall Place Farm, Tilehurst' was assessed through the HELAA, and the HELAA concluded that there are constraints which mean the site is unlikely to be suitable within the next 15 years - development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape.</p> <p>No further changes to Policy SP13 are proposed.</p>
Barton Willmore for Donnington Valley Group (lpr2435)	Object to policy.	The site at Donnington Valley Golf Club (SCD7) has been assessed through the HELAA, and the HELAA concluded that the site is 'potentially developable in part'.

Respondent (with lpr ref)	Response	Council Response
	<p>We do not agree with the Council's approach of ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas.</p> <p>In considering sites promoted within the call for sites, the Council have ruled out all sites which do not fall within the service villages, rural service villages or urban areas (i.e. the settlement hierarchy). At paragraph 78, the NPPF states:</p> <p>“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”</p> <p>The Council's approach to rule out sites which are outside of the settlement hierarchy (at stage 3 of the site selection process), without considering the site-specific benefits of such site, is inconsistent with the above paragraph of national planning policy. The approach also overlooks the circumstances relevant to settlements such as Donnington which, whilst below the Council's settlement hierarchy, has a close functional relationship to Newbury and, therefore, benefits from the services and facilities in Newbury which are readily accessible.</p> <p>The Council's approach also overlooks the site-specific landscape character and sensitivity of our client's site, Donnington Valley Golf Course (HELAA site reference SCD 7). The Landscape and Visual Appraisal Note which accompanies these representations includes detailed landscape consideration and concludes that landscape and visual considerations to not represent a significant constraint to development. The site is visually well contained and could accommodate</p>	<p>The site has been subject to more detailed site selection work, however it was not proposed for allocation due to the location of the site in a settlement that lies outside of the settlement hierarchy.</p> <p>The settlement hierarchy guides the broad location of new and sustainable development, and takes account of the function and sustainability of settlements across the district. Such an approach is in conformity with the NPPF which states at paragraph 9 that <i>“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”</i></p> <p>No further amendments to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>smaller parcels of development or across the whole site. Given the contained nature of the site, relationship to Newbury, and location outside of the AONB, Donnington Valley Golf Course offers the potential to support more substantial growth than many other smaller villages which are below the settlement hierarchy. As such, we would welcome the opportunity for discussions with the Council as to the best way that this can be delivered. One option would be for the comprehensive development of the site which would delivery approximately 500-550 dwellings along with modest services and facilities for the benefit of the existing and future the community. This would help to ensure the long-term sustainability of Donnington. Alternatively, development of a more modest scale (50-100 dwellings) could be allocated within the plan which would enable delivery in the short-term and would support the viability of the existing leisure use on the site.</p> <p>The Council's approach to housing delivery includes reliance two large allocations (Sandford Park (1,000 dwellings) and North West Thatcham (1,250 dwellings)). These sites are relied upon to contribute 23% of the housing target. Whilst the principles of delivering large sites with accompanying infrastructure is supported by national planning policy, and we do not object to these allocations, we raise concern that the numbers suggested may not be delivered within the plan period. In particular with these large allocations, substantial infrastructure will need to be delivered prior to any housing delivery. Increased small and medium scale sites would complement these larger sites by ensuring a constant stream of delivery whilst larger sites start to mobilise. A modest area of development (50-100 dwellings) at Donnington Valley Golf Course would provide a suitable additional allocation to be delivered in the short term and compliment the longer-term allocations.</p> <p>Finally, we note that the settlement boundary review for settlements below the hierarchy (including Donnington) is yet to be undertaken. In</p>	

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	<p>undertaking the settlement boundary review, we would encourage the Council to consider the benefits of the inclusion of all or part of Donnington Valley Golf Course within the settlement boundary to enable residential development in this location. We would also request that, in reviewing the settlement boundary of Donnington, the Council refer to the Landscape and Visual Appraisal Note which support this submission and provides detailed consideration of the landscape sensitivity of the site.</p> <p><b>Donnington Valley Golf Course -</b></p> <p>For context, the Site which measures approximately 45Ha in area, is situated directly to the north of the defined settlement of Donnington and comprises two separate parcels of land separated by Wantage Road. The largest parcel of land comprises an 18-hole golf course as well as a hotel with associated spa and restaurant. The golf course has recently ceased to be a Golf Club. This area is contained by Oxford Road to the east, the A34 to the north and Wantage Road to the west. The smaller parcel to the west of Wantage Road is a greenfield site surrounded by hedgerows.</p> <p>The site is entirely within Flood Zone 1 and is to the south of the North Wessex Downs AONB.</p> <p>The site provides the opportunity for a comprehensive residential development of family housing in an area of the district which is well related to Newbury. If the Council were to agree that the site should be delivered holistically, 500-550 dwellings could be delivered on the site. Alternatively, a smaller area of the site (c. 50-100 dwellings) could be delivered in order to support the ongoing viability of the golf course and hotel.</p> <p>The Landscape and Visual Appraisal Note which accompanies this submission concludes that the site is well-contained and could</p>	

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	<p>successfully accommodate development in a number of locations across the site including the whole site. Of particular note is that the site is well-screened from the AONB and, therefore, would not result in a harmful impact upon this area.</p> <p>In summary, we are continuing to promote the Site at Donnington Valley Golf Course for either a holistic development of approximately 500-550 dwellings or a more modest development of c. 50- 100 dwellings could be delivered on part of the site in order to support the viability of retaining the existing leisure uses on the site. We would welcome the opportunity to discuss the site further with the Council and the contribution which the site could make to the delivery of housing within West Berkshire.</p> <p>The Council should seek to accommodate further growth across the district including seeking opportunities for development through the settlement boundary review.</p>	
Origin 3 for Sandtrend Ltd (lpr2400)	<p>It is noted in the LPR that delivery at Newbury focusses upon major development sites to deliver a significant proportion of the housing requirements for the district. Emerging policies SP16 ('Sandleford Park', Newbury) proposes approximately 1500 homes, whilst Policy SP17 ('North East Thatcham') proposes up to 2500 homes – and the LPR clearly sees these as important allocations.</p> <p>In the LPR consultation we note that at Sandleford Park, the emerging LPR places emphasis on ensuring that a comprehensive approach to development is achieved. An SPD for the site was adopted in 2013 and it was subsequently amended in 2015 in response to concerns over it not being developed in a comprehensive manner. However, the LPR (at para 6.30) notes that Sandleford is still yet to deliver new homes. Further at LPR para 6.35, whilst criteria are identified in the policy for delivering development at the site, these will need refinement to include specific mitigation measures. It appears therefore that even alongside a revised SPD, important issues require exploration to assist in the delivery of homes at the site. It is noted in the LPR that planning applications have</p>	<p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandleford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandleford Park site.</p>

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	<p>been made to deliver new development. However none have been granted. It is noteworthy that an appeal has recently been lodged by Bloor Homes following the refusal of planning permission for 1000 homes in October 2020.</p> <p>Turning to North East Thattham, this is a location to receive a significant amount of growth as an urban extension. It is identified for some 2,500 homes with 1250 homes to be delivered by the end of the plan period. It is allocated as a means of supporting the Council's initiative for Thattham's regeneration. As with Sandford, where development is of a significant scale, concerns will arise over the timescales for over co-ordinated, masterplanned delivery – particularly where aligned with associated key infrastructure. In respect of the latter, it is notable that new infrastructure which includes a secondary school and two primary schools are a policy requirement. As with Sandford the note that the emerging Policy SP17 specific to North East Thattham requires a co-ordinated approach in delivering a 'sustainable, comprehensive and landscape-led development'. Clearly reliance is placed upon the timely delivery of these sites.</p> <p>With the Council placing great emphasis upon these larger sites to deliver a significant proportion of the housing requirement, we consider that a more robust and deliverable strategy would be to allocate land north of Newbury having undertaken a fuller search of this area.</p> <p><b>1. Direction of Development</b></p> <p>In advance of the Regulation 19 consultation later in 2021, further consideration should be given to the development potential of land directly north of Newbury. This area's connectivity to the M4 corridor and into Newbury presents an opportunity for carefully planned growth.</p> <p>To the north of Newbury and west of the B4494 new development can be readily accommodated – supported by existing facilities. To the east of</p>	<p>The site 'Land west of Wantage Road, Shaw, Newbury' was assessed through the HELAA (site ref SCD2), and the HELAA concluded that the site is 'potentially developable in part'.</p> <p>The site has been subject to more detailed site selection work, however it was not proposed for allocation due to the location of the site in a settlement that lies outside of the settlement hierarchy.</p> <p>The settlement hierarchy guides the broad location of new and sustainable development, and takes account of the function and sustainability of settlements across the district. Such an approach is in conformity with the NPPF which states at paragraph 9 that <i>"Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."</i></p> <p>No further amendments to Policy SP13 are proposed.</p>

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	<p>the area is the head offices of Vodafone – a major local employer; and other local facilities are accessible and could be supported further by additional residential development. Connectivity to Newbury is also good, with the centre less than a 1km by road from the edge of the area for wider assessment (that is from the junction of the B4944 and Grove Road).</p> <p>Through this assessment development sites can be identified to meet needs and address any shortfall in planned delivery in the short-medium term.</p> <p>Changes sought:</p> <p>Our client requests that West Berkshire Council re-assesses the development potential of land north of Newbury – west of the B4944 and north of Grove Road/Lambourn Road at Donnington. Through further analysis and in advance of a Regulation 19 consultation, energies should be directed to assessing options for sites to come forward to deliver residential development in the short to medium term.</p>	
Bluestone Planning for Darcliffe Homes Ltd (lpr2428)	<p>Darcliffe Homes Ltd (hereafter 'Darcliffe') support the principle stated in policy SP1 Spatial Strategy of identifying the locations as set out in the settlement hierarchy in policy SP3 where residential development may take place. This is consistent with the guidance on the general approach to the delivery of new homes, as set out in the NPPF.</p> <p>The densities as set out in the policy are generally supported, although it should also be noted that higher density may also be achievable in certain locations, particularly around the Eastern Area. Careful and sensitive design can deliver higher density, without leading to unacceptable intensification.</p> <p>The policy also refers to the significant commitments throughout the District and as explained below, there are concerns that these either may</p>	<p>Support noted.</p> <p><u>Concern about the non-delivery of committed developments:</u></p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met. The upper end of the range has been proposed to allow for approximately 5% additional homes.</p> <p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>not come forward during the Plan period and/ or are being built out at a rate which would mean that they are not appropriate for inclusion in the Adopted Plan and therefore alternatives will have to be sought.</p> <p>Policy SP3 sets out the settlement hierarchy and identifies the urban areas which will be a prime focus for housing. It is supported that the Eastern Urban Area will be a focus, although there is a significant imbalance between the numbers allocated to Newbury and Thatcham when compared to Eastern Area, with over 4,000 homes to the former and under 1,000 homes to the latter. This is not considered appropriate given the level of services and facilities provided to the Eastern Area.</p> <p>With regard to the Eastern Area specifically, it is stated that new allocations for Tilehurst and Burghfield will be made through NDPs. This is clearly dependent on the NDP process, which is lengthy and sometimes fraught with difficulties.</p> <p>At the time of writing, Tilehurst for example have not yet published their draft Neighbourhood Plan and therefore it will still be some time before this can be taken to and approved at referendum, and housing can start to be delivered in accordance with such allocations. Although Policy SP14 sets out that the Designated Neighbourhood Area should allocate 175 dwellings, there is no timeframe for when this may come forward or whether this number will be agreed.</p> <p>It should also be noted that in the HELAA the text regarding Tilehurst makes it clear that allocations will be made within the Local Plan Review where not allocated by the NDP.</p> <p><i>“Tilehurst</i></p> <p><i>8.31. Tilehurst Parish is designated as a Neighbourhood Area, and Tilehurst Parish Council are preparing a neighbourhood plan. The Parish Council have expressed an intention to include residential allocation(s) in</i></p>	<p><u>Imbalance in numbers between the Eastern Area and Newbury/Thatcham:</u></p> <p>There are a significant number of constraints within the Eastern Area, meaning that provision for new development is more limited. Nonetheless several sites are proposed for allocation within the Eastern Area.</p> <p><u>Reliance on allocations in neighbourhood plans:</u></p> <p>Allocations in Tilehurst had been proposed to be included within the neighbourhood plan that is being prepared by Tilehurst Parish Council and which will cover the whole of Tilehurst Parish. It is for this reason that the draft emerging Local Plan Review (LPR) did not propose any allocations in Tilehurst. Since the consultation on the emerging draft LPR, Tilehurst Parish Council has decided not to include any allocations within the neighbourhood plan, and it will instead comprise of development management policies.</p> <p>As part of the work on proposed submission (Regulation 19) version of the LPR, sites in Tilehurst have been considered for allocation through SA/SEA and more detailed site selection work. Site TIL13 (Land at Pincents Lane, Tilehurst) was recommended by officers as being suitable for allocation. However, the Member decision was that the site should not be proposed for allocation due to the impact that development would have on the local highway network.</p> <p>In Burghfield, the entirety of the Parish falls within the AWE Burghfield Detailed Emergency Planning Zone (DEPZ) whereby there are restrictions around new residential development. Because of this, a housing requirement of zero has been given to the designated Neighbourhood Area.</p> <p><u>Reliance on strategic sites:</u></p>

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	<p><i>the neighbourhood plan. The site selection work will therefore be undertaken by the Parish Council.</i></p> <p><i>8.32. In the event that Tilehurst Parish Council choose not to include residential site allocations in the neighbourhood plan, then West Berkshire Council will pick up the site selection work and consider allocations through the LPR.”</i></p> <p>All other locations are to be treated as open countryside (as set out in Policy SP1) and therefore no sites in these areas could be brought forward in accordance with policy. It is therefore considered that housing allocations should also be made either independently or collaboratively in the Review Local Plan or the policy should be more flexibly worded in the urban areas.</p> <p>There is a concern that policies do not go far enough in bringing forward small and medium sized sites, particularly those located on the edge of the identified urban area settlements. As stated above, if such sites are not allocated in the Local Plan Review or in particular, a NDP, because an NDP has either not been developed or has been delayed, there is no mechanism for such sites to be approved in the future. This may be an issue of great concern where some of the larger strategic sites are not deliverable within the Plan period.</p> <p>It is also unclear from the supply calculations whether or not there has been an undersupply from the Core Strategy 2012 which has been carried forward. Sandlesford Park was allocated in the 2012 Core Strategy and has not yet been granted permission. Clarification is sought as to how this has been dealt with and whether further sites should be allocated in this regard.</p> <p>The table in Policy SP13 also sets out that Sandlesford Park seeks to accommodate up to 1500 dwellings, whereas the text in paragraph 6.12</p>	<p>The Council's strategy is for a mix of sites: strategic sites such as Sandlesford Park and North East Thatcham can deliver infrastructure, facilities and significant numbers of affordable homes over the medium to long term. A number of medium and smaller sites will deliver housing in the short to medium term. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The proposed strategic allocation at North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p> <p>Outline planning permission has been granted for 1000 dwellings and 80 extra care units on the eastern part of Sandlesford Park. There is an outline planning application pending determination for 500 dwellings on the western part of the Sandlesford Park site.</p> <p>The Council is not relying on the total allocation at either Sandlesford Park or North East Thatcham to meet the need up to 2039.</p> <p><u>Core Strategy undersupply:</u></p> <p>Regarding the supply calculations, there is no undersupply carried forward from the Core Strategy. National guidance is clear that this is factored into the standard method.</p>

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	<p>states that only 1,000 houses will be delivered by 2037 and the remainder in the following Plan period.</p> <p>This approach is also inconsistent with the encouragement of developers to bring forward small and medium sized sites. The HBF document (2017) ‘Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes’ notes (p.29) that:</p> <p><i>“For understandable political and financial reasons, planning authorities have increasingly sought to allocate very large strategic sites for residential development in order to satisfy its requirement to demonstrate a five-year land supply. Large sites on the edge of settlements can be less likely to spark political controversy as they are slightly removed from existing communities. For the very same reason, however, they may require substantial infrastructure and up-front financing resulting in relatively lower delivery rates in the early years of the site’s existence making rapid delivery unrealistic.”</i></p> <p>The latest research from Lichfields (February 2020) ‘Start to Finish What factors affect the build-out rates of large-scale housing sites? Second edition’ discusses the lead times on large sites and the data is not encouraging:</p> <ul style="list-style-type: none"> <li>• Schemes of 500-999 dwellings take on average approximately 5.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 1,000-1,999 dwellings take on average between 6.9 and 7.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 2,000+ dwellings take on average approximately 8.4 years from validation of the initial outline application to delivery of</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<p>the first house. These do not contribute any completions in the first five years. 6.1 years of this are taken up with the planning application process. (see figure 4 of the Lichfields document)</p> <p>In contrast, smaller sites between 0 and 99 dwellings typically deliver within 3.3 years of the validation of the first application.</p> <p>On this basis it is considered that the following should be taken into consideration:</p> <ul style="list-style-type: none"> <li>• SP16 Sandford Park is allocated for 1,000-1,500 dwellings, taking the above into account, it would take between 6.9 – 7.0 years until the first dwelling is built based on the above assumptions. It should be noted however that the site has been allocated since 2012 and although a number of applications have been submitted, there remains outstanding issues and the site still does not have permission. It is therefore considered that given the length of time taken to date, that the site is unlikely to realistically deliver the numbers proposed.</li> <li>• SP17 North East Thatcham is allocated for 2,500 dwellings, taking the above into account, it would take 8.4 years from validation until the first dwelling is built, based on the above assumptions. There has been no application to date. It is unlikely therefore that any dwelling would be built until approximately 2030 and following this, the average annual build-out rate for a scheme of 2,000+ dwellings is an average of 160 dpa (as set out in the aforementioned Lichfields report). On this basis, with the Plan period up to 2037, this would equate to 1,120 dwellings during the Plan period and not 2,500 as set out. It is unrealistic that on an allocation of this size that dwellings could be brought forward to the market at a faster rate.</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<p>The HBF document goes on to advise that (p.29-39):</p> <p><i>“Once allocated, LPAs are systematically failing to assess on an ongoing or regular basis, the actual delivery achieved against the targets indicated in its local plan. For instance, by allocating one or several very large sites to achieve a five-year supply of land, delays progressing one site through planning will have a substantial impact on the ability of the authority to adequately plan for the number of homes required.....</i></p> <p><i>..... To meet demand for housing, we need more sites of all sizes allocated. Indeed, large sites often deliver new homes at astounding rates, particularly in areas where the market is strong, but small sites are consistently efficient in their delivery. For this reason, the allocation of a wider range of sites within local plan allocations would not only help increase plurality in the housebuilding sector, it would also improve the chances of local authorities’ meeting ambitious supply trajectory plans. Achieving this all-round positive outcome need not involve overly prescriptive diktats. A subtle shift in policy emphasis, along with a greater focus on ongoing delivery within a local plan period would help to achieve a positive change in behaviours at a local level.....</i></p> <p>The above is also irrespective of the fact that many of the smaller HSA sites are already near completion and at least some the numbers should have potentially been counted before the Plan period. Therefore, these numbers are unlikely to be taken forward in the Adopted Local Plan.</p> <p>In addition, based on last published WBC housing monitoring report (2019), there was a projected windfall allowance of 362 dwellings for the five years up to 2024. To cover the Local Plan Review period to 2037 would suggest a windfall figure of 1,231 dwellings should be included in the supply and not 1979 as currently stated in Table 2 Housing Supply at March 2020. Therefore, there is real danger that the delivery target will not be met due to a reliance on windfalls. This makes very clear that when combined with a lack of flexibility / unclear non-implementation</p>	<p>No further amendments to Policy SP13 are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>allowance, that there is a need for more allocation sites to bridge the shortfall, in the order at least 700 units.</p> <p>In summary, there is a clear under provision for new sites and further small to medium sites should be considered with flexibility to allow sites on the edge of the urban areas identified to come forward to ensure that sufficient sites can be delivered within the Plan period.</p> <p>Changes sought:</p> <p>It is considered that policies SP1 and SP3 should be reworded to provide more flexibility.</p> <p>Other nearby Local Planning Authorities have recognised the issue that can arise where a NDP is not delivered. For example, South Oxfordshire District Council in their Policy H1 of the recently adopted Local Plan (but see also their Core Strategy which also contained a similar policy) set out that:</p> <p><i>“Where Neighbourhood Development Plans are not progressed in larger villages and market towns, planning applications will be considered against the housing delivery targets for the towns and larger villages set out in this Plan.”</i></p> <p>A form of words reflecting the above, would ensure that there would be sufficient flexibility to take into account any NDP problems and Policy SP1 should be amended accordingly, with and SP3 and DC1 given clarification in this regard.</p> <p>To reflect this and the potential undersupply of housing, further small to medium sites should be also be added to policies SP13-14, with any update to SP12 as a result. Darcliffe Homes are proposing two such</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>sites within the Eastern Urban Area, which would deliver up to 80 dwellings.</p> <p>The supporting text at paragraph 6.22 would also need to be updated in this regard.</p> <p>The addition of further small to medium sites such as these will require a re-consideration of the capacity of the strategic-scale sites to reflect realistic expectations. Revising the site capacities slightly downward to accommodate a shift of dwelling numbers will not however adversely affect the ability of the promoters to bring the strategic sites forward for development, but will allow a longer period for developing out the entirety of the site, which is likely to run into the following Plan period.</p> <p>Allocating additional small to medium sites will also have a positive effect on the smaller scale and local housebuilding industry, which includes Darcliffe Homes, in providing opportunities that will help to continue to sustain this important re-emerging sector of the housebuilding industry.</p>	
Deborah Reynolds (lpr2465)	<p>SP 13 lists the sites for residential and mixed use in Newbury and Thatcham for sites 1 ha or more. Here it adds in NE Thatcham as SP17 for the first time. This draft local plan review and associated report therefore set out a huge increase in development area and house numbers.</p> <p>There is no justification for such an increase in allocation, and in SP17 the proposal of 2500 houses is completely disproportionate for Thatcham and surrounding areas. In the opinion of Bucklebury Parish Council the figures are flawed and therefore withdrawal for a fundamental review and meaningful justification is essential.</p> <p>The impact on the local setting and breach of the Floral Way boundary, objections raised by the North Wessex AONB, are not addressed. No case has been made for ribbon development and the 'Colthrop village'</p>	<p>Comments noted.</p> <p>The Local Plan Review seeks to carry forward housing allocations from the Housing Site Allocations Development Plan Document which have not yet come forward or have commenced, and seeks to allocate new sites in order to meet the housing target for West Berkshire. Thatcham is in the Urban Area, as set out in the Settlement Hierarchy, which, along with Newbury and the Eastern Urban Area, is a focus for housing and economic development.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>concept is a completely unacceptable joining up of Midgham and Bucklebury Parishes with Thatcham and should be removed from any future considerations.</p> <p>Any housing allocation must demonstrate local benefits to the natural environment.</p> <p>The model for infrastructure provision is dependent on realising house sales, therefore is not 'baked-in' or inevitable. A transparent, enforceable commitment to ensure fair share of profit and investments in local assets is an essential pre-commencement commitment which should be policy for any development.</p> <p>The level of ambition for infrastructure provision and biodiversity gain is insufficient. No budget is allocated to achieving 10% biodiversity gain in the appraisal of viability, the design features do not demonstrate any input from conservation professionals, nationally or locally.</p> <p>Green and biodiverse are not equivalent. The concept, beneficiaries and impact of a new strategic country park are unclear. Any future consideration of the idea must make clear that is outside the area of allocation and protected in perpetuity.</p> <p>If land at 'Colthrop village' is no longer needed for farming it should be entirely devoted to biodiversity net gain and used to establish a fully functional wildlife corridor between the Kennet valley and Bucklebury heathland.</p> <p>Numerous aspects of the Bucklebury vision have been ignored. It is appears that the views of residents on the edge of the proposed area were either not sought or not taken into account.</p> <p>Recommendation 6 – SP13 is unacceptable and needs alteration, particularly removal of the proposed NE Thatcham line item. All the</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>reasons are set out above and in the Bucklebury Parish Council and Thatcham Town Council submissions.</p>	<p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		As part of the submission version of the Local Plan Review the housing number to be delivered in the plan period has been amended to 1500.

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR Policy: SP14 Sites allocated for residential and mixed-use development in the Eastern Area

#### (Proposed Submission LPR Policy: SP14 Sites allocated for residential and mixed-use development in the Eastern Area)

Number of responses received: 41

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr208)	Support policy.	Support for policy noted.
Aldermaston Parish Council (lpr1055)	APC remains of the view that there is insufficient space for 8 new (permanent) pitches at New Stocks Farm, Paice's Hill	Comments noted. It is considered that there is sufficient space on site. The GTAA 2021 recommends further pitches on site. A planning application has been submitted for 8 pitches.
Stratfield Mortimer Parish Council (lpr402)	Support policy.	Support for policy noted.
Wokingham Borough Council (lpr1468)	<i>Wokingham Borough Council's full representation is attached</i>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>There are no significant new allocations bordering WBC that are considered likely to have significant impacts for its residents or the delivery of WBC services. However, it is recommended that clarification is sought on the following residential sites carried forward from the HSA:</p> <ul style="list-style-type: none"> <li>Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common – proposed for around 100 dwellings and, as stated in the Site Selection Background Paper, benefits from planning permission. However, construction has not begun and the applicant has provided no deliverability update. It is located within the DEPZ surrounding AWE Burghfield which was updated in May 2020. WBC understands additional development within the DEPZ will not be compatible with the AWE Off-Site Emergency Plan. In the event that the extant permission lapses, WBC requests clarity from WBDC, as the emergency planning authority for the area, on whether this site is a deliverable including the advice of the emergency planning officer with regard to the AWE Off-Site Emergency Plan.</li> <li>Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common – proposed for around 60 dwellings, of which 28 dwellings have planning permission and construction has begun. As above, this site is located within the DEPZ surrounding AWE Burghfield; accordingly WBC would welcome clarity as to whether the remainder of the site without planning permission is deliverable, with reference to the AWE Off-Site Emergency Plan.</li> </ul> <p>WBC wish to remain fully engaged with WBDC's transport modelling and Infrastructure Delivery Plan work moving forward to ensure that there are no significant adverse impacts of cumulative planned development on Wokingham Borough.</p>	<p><u>Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common</u></p> <p>Planning permission on this site (ref: 22/00325/RESMAJ) was approved before the new DEPZ for AWE Burghfield was determined. The Council's Emergency Planning Team have not objected to the development of the site.</p> <p><u>Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common</u></p> <p>The allocation is proposed to be removed from the Local Plan Review (LPR) following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as development had not yet been built out. The site does not have planning permission for residential development.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an</p>

Respondent (with lpr ref)	Response	Council Response
		<p>incident at the AWE. There is potential harm to future public safety.</p> <p>The Council's Emergency Planning Team and the AWE object to the development.</p>
Reading Borough Council (lpr1489)	<p>In terms of the sites identified, our main interest lies in the Eastern Area, comprising Purley on Thames, Tilehurst, Calcot and Theale. Policy SP 14 states that this area will accommodate approximately 730-780 homes during the plan period.</p> <p>Reading Borough Council can only support the identification of the proposed housing site allocations to accommodate up to 780 dwellings in this area if the impact of the development of those sites is properly mitigated, which would include impact on infrastructure and services within Reading Borough. In particular, the significant impacts on transport, healthcare and education must be considered and reflected in Local Plan.</p> <p>It is difficult for RBC to properly assess the effects of these developments without the publication of the Infrastructure Delivery Plan (IDP) or a Policies Map. It is particularly unclear where "EMP6: Land north of Arlington Business Park" is located exactly. Once the IDP and Policies Map are published, RBC will likely have further and more detailed comments. With regard to infrastructure, the following sites are of particular concern:</p> <ul style="list-style-type: none"> <li>• RSA10: Stonehams Farm, Tilehurst EUA008 (60 dwellings)</li> <li>• RSA11: Stonehams Farm, Tilehurst EUA003 (85 care home bedspaces)</li> <li>• RSA12: 72 Purley Rise, Purley on Thames (35 dwellings)</li> <li>• RSA13: Land adjacent to Junction 12 of M4, Bath Road, Calcot (150-200 dwellings)</li> <li>• RSA14: Land adjacent to Bath Road and Dorking Way, Calcot (35 dwellings)</li> <li>• RSA15: Land Between A340 and The Green, Theale (100 dwellings)</li> </ul>	<p>Comments noted.</p> <p><u>Infrastructure Delivery Plan:</u></p> <p>An emerging draft Infrastructure Delivery Plan was published in October 2021.</p> <p><u>Allocations:</u></p> <p>Several of the allocations referenced in the response are no longer proposed for allocation for the following reasons:</p> <ul style="list-style-type: none"> <li>• RSA10 Stonehams Farm, Tilehurst: development is under construction.</li> <li>• RSA13 Land adjacent to Junction 12 of M4, Bath Road, Calcot: development is under construction and close to completion.</li> <li>• EMP6 Land north of Arlington Business Park: the site has been subject to a Landscape Capacity and Sensitivity Assessment. This recommends that if the site was developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. In light of the recommendations, the site is no longer being proposed for allocation.</li> </ul> <p>The development potential at two of the sites is being produced to take account of recommendations in Landscape Capacity and Sensitivity Assessments:</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• RSA16: Whitehart Meadow, Theale (100 dwellings)</li> <li>• RSA17: Former sewage treatment works, Theale (70 dwellings)</li> <li>• EMP6: Land north of Arlington Business Park (20,000 sqm employment floorspace)</li> </ul> <p>In terms of transport, continued investment in non-car modes of transport, including buses and cycling, will be key in minimising the transport effects of these allocated sites. For developments on the edge of Reading, this may include park and ride to connect into central Reading and fast-track public transport corridors across Reading, other public transport measures as well as active travel such as walking and cycling. Reading’s draft Local Transport Strategy, published in May 2020, sets out the proposals for travel across Reading and it will be vital that development on the edge of Reading links into these wider objectives, and makes use of any opportunity for inclusion of on-site transport infrastructure to support these objectives.</p> <p>Additional housing will result in an increase in school-age children in the Eastern Area. There is already substantial cross-boundary movement of pupils between Reading and West Berkshire, with existing strains on education infrastructure in the wider west Reading area. The need for new school places must be therefore be considered and addressed in co-operation with Reading Borough Council.</p> <p>New housing provision will also result in an increased need for additional health facilities in the West Reading area. In particular, there is a need for increased GP capacity in the area. This must also be recognised and properly addressed.</p> <p>Reading Borough Council considers it essential to agree with West Berkshire Council a protocol to ensure that, in planning and approving developments with cross-boundary implications such as those listed above, proper and adequate contributions are delivered towards future education,</p>	<ul style="list-style-type: none"> <li>• RSA16 Whitehart Meadow, Theale: the development potential is now approximately 40 dwellings.</li> <li>• RSA17 Former sewage treatment works, Theale: the development potential is now approximately 60 dwellings.</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	health and transport infrastructure, whether this is through the Community Infrastructure Levy process, or through Section 106 contributions.	
Reading Borough Council (lpr1493)	<p><b>Grazeley</b></p> <p>Since 2016, WBDC, RBC and Wokingham Borough Council have undertaken considerable amounts of joint work on developing proposals for around 15,000 new homes at Grazeley Garden Town, south of Reading and within Wokingham and West Berkshire. Regrettably, the bid to the Housing Infrastructure Fund for forward funding of the necessary infrastructure was unsuccessful, and the extension of the Detailed Emergency Planning Zone for the Atomic Weapons Establishment Burghfield to cover the Grazeley site has cast considerable doubt on the future of the proposal and resulted in an objection to its inclusion in Wokingham's Local Plan by the Ministry of Defence. Whilst these circumstances make it almost impossible for WBDC to rely on a strategic allocation at Grazeley as part of the Local Plan, and the Local Plan rightly pursues other options, the document as drafted does not give any indication that it would support the advancement of these proposals in the future if the considerable constraints can be overcome. Grazeley only merits a passing mention in paragraph 6.22.</p> <p>RBC wishes to ensure that the Grazeley option remains on the table should circumstances change in the future. There are limited opportunities to meet the housing needs of the area, including affordable housing need, in a location where it can be easily accessed by high quality new public transport connections and served by substantial investment in new infrastructure, and Grazeley was one such opportunity. RBC suggests that the Local Plan should state that the constraints of the site should remain under review by WBDC, WBC and RBC, and that, should conditions allow for the site to be brought forward, this will not be in conflict with the overall strategy of the plan. RBC commits to continuing to work with WBDC on this site or other strategic options for meeting the needs of the wider area.</p>	<p>Comments noted.</p> <p>Though Grazeley was identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation.</p> <p>Given that the Council are removing sites for previously allocated residential sites in the DEPZ, which have not yet been implemented, or do not benefit from outline or full planning permission, it would not be appropriate, at least in this version of the Local Plan Review, to keep Grazeley as a 'reserve site'. Furthermore, there are other housing allocations which would aid in meeting the District's housing needs.</p>

Respondent (with lpr ref)	Response	Council Response
Tilehurst Parish Council (lpr1982)	<p><i>Full representation from Tilehurst Parish Council and Tilehurst Neighbourhood Development Plan Steering Group is attached.</i></p> <p>We have reservations about the figure of 175 dwellings in SP14. Whilst we accept the need for housing, particularly affordable housing, in the Eastern Area, it is difficult to see where this scale of development could be located in the Parish given its existing concentration of housing and boundary with the AONB.</p>	<p>Comments noted.</p> <p>The indicative housing requirements for the designated Neighbourhood Areas have been based on the available development opportunities identified in the Housing and Economic Land Availability Assessment (HELAA). Consideration has also given to the placing of a settlement within the settlement hierarchy.</p> <p>Tilehurst is a suburb of Reading and forms part of the Eastern Urban Area alongside Calcot and Purley on Thames. Within the settlement hierarchy it is identified as an 'Urban Area' because of the wide range of services offered and subsequently will be the focus for the majority of development.</p> <p>The February 2020 HELAA identified four sites as having potential, and this remained unchanged in the updated HELAA that was published in December 2020. Taking the development potential of these sites into consideration alongside the placing of Tilehurst within the settlement hierarchy as part of its location within the AONB, it was considered that a housing requirement of 175 dwellings would be appropriate.</p>
Holybrook Parish Council (lpr1324)	<p>Object to policy.</p> <p><b>Policy SP 14 Sites allocated for residential development in Eastern Area</b></p> <p>This list is out of date and misleading. The HSA12 development is underway and was approved for 199 homes.</p> <p>HPC's concerns and objections to development Site Ref HSA 12 were not listened to and yet the objections made were in line with the policies outlined</p>	<p>As part of the preparation of the draft emerging (Regulation 18) LPR, regard was given to the residential planning commitments data for the period 1 April 2019 to 31 March 2020 (and which had a base data of 31 March 2020). This indicated that development of the site had not yet commenced.</p> <p>Since the Regulation 18 consultation, development has progressed on the site and it is now close to completion. It is therefore proposed to remove the allocation HSA12.</p>



Respondent (with lpr ref)	Response	Council Response
	in the Local Plan. Therefore, although the Emerging Local Plan looks and sounds good on paper there is little confidence that the policies will be properly implemented and that any concerns and objections be heeded.	
<b>General consultation bodies</b>		
Heritage Forum (lpr76)	Object to policy. SP14 RSA20. The correct name of the road is New Road Hill. The development of 14 houses on land on this road and north of the A4 has recently been turned down because of the dangerous access.	Comments noted.  <u>Road name:</u>  The road name in the policy will be corrected as follows:  <i>#New Road Hill.</i>  <u>Access:</u>  The site has been subject to two planning applications (19/01942/OUTMAJ and 20/03028/OUTMAJ), both of which were refused. Access did not form a reason for refusal.
West Berkshire Green Party (lpr1837)	We broadly support this policy.	Support for policy noted.
CPRE Berkshire (lpr1702)	<b>existing permission</b>  Theale by-pass - an application for 350 homes was allowed on appeal in 2007 on this partially restored old railway sidings site. Since then, nothing has been built. The location is well connected with Reading for employment and has good transport links: we think it is time WBC did something to gain this large housing number by using its compulsory powers to purchase the site and get on with it.	Comments noted.  Theale bypass (Lakeside) has an extant consent. The permission was implemented. There are further applications pending consideration for the detailed design, and there are indications that the site will be delivered without the need for Council intervention.  It is agreed that development should be limited for the sites at THE1 and THE7, to keep development west of the

Respondent (with lpr ref)	Response	Council Response
	<p>Theale sites THE1, 7 at the end of Theale we have previously objected to where land comes up against the M4 and lies under a major pylon line - the worst area for quality of life for residents. Building here should be kept well away from the Pylon line and we recommend a woodland planting between the M4 and the Pylon line as part of WBC Climate emergency strategy.</p> <p>Further east we recommend re-instating the small sites in the Grazeley area now that the government is not going forward with a major Garden Village in this area.</p>	<p>overhead power lines. Landscape Sensitivity and Capacity Assessments have been undertaken for both sites, and recommend certain parameters for the design of the sites. To this end the development potential has reduced. In the case of the former Sewage Treatment Works this has reduced to 60, and for Whitehart Meadows this has reduced to 40. The policy will be updated to reflect the changes in the housing numbers.</p> <p>The Council are led by its Spatial Strategy and Settlement Hierarchy. Grazeley, due to its size, would have been a New Town, with the associated infrastructure and services. The Spatial Strategy and Settlement Hierarchy seeks to place the majority of development in the main urban areas, and to a lesser degree in the rural service centres and service villages. The settlements around Grazeley fall outside of the settlement hierarchy and it would not be considered appropriate to allocate sites for residential development in and around them. Furthermore, such settlements are likely to be included in the updated Detailed Emergency Planning Zone (DEPZ) which would advise against residential development.</p>
<b>Other stakeholders</b>		
Martin Vile (lpr18)	<p>Object to policy.</p> <p>The two sites in Theale allocated for residential development (RSA16 and RSA17) are totally inappropriate in their scale and position.</p> <p>RSA 16 will decrease the buffer between Theale and Calcot and overcrowd that area of the village. In addition this area is prone to flooding and has overhead power lines that would compromise the viability of any housing.</p>	<p>Comments noted.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations. Therefore, it is appropriate to allocate sites in Theale.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>RSA 17 is a development of inappropriate size where the access road is via Blossom Lane and Crown Lane, this increased traffic will cause more congestion in these narrow roads, this in tern will increase the risk to residents. This also impacts on Theale conservation areas.</p> <p>The area is also prone to flood risk and has high voltage overhead power lines making it unsuitable for housing development.</p> <p>There are numerous other housing developments in Theale that already have planning permission both large and small and these additional 400 plus properties will strain the local infrastructure that is already creaking. RSA16 and RSA17 are not required and would have a substantial negative impact to the existing residents of Theale on top of those developments already passed.</p> <p>There are also numerous other housing development sites in West Berkshire that are more appropriate and better positioned.</p> <p>Changes sought: remove RSA16 and RSA17 from the list of sites allocated for residential development.</p>	<p>The Local Plan is landscape-led. Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR, including the proposed two allocations at Theale. The developable areas are limited to the settlement side of the overhead power lines, which also responds to comments of the National Grid. Certain design parameters are recommended, including a density of 30 dwellings per hectare, limit to 2 storey development; and creating a positive interface to the existing public open space. To this end the development potential has reduced. In the case of the former Sewage Treatment Works this has reduced to 60, and for Whitehart Meadows this has reduced to 40. The policy will be updated to reflect the changes in the housing numbers.</p> <p>A successful challenge was made to the extent of the flood risk zone to RSA16. Much of the site has therefore been removed from Flood Zone 2 and now falls within Flood Zone 1. The developable area would only be in Flood Zone 1, and sustainable drainage methods would be required.</p> <p>Access to RSA17 will be via Blossom Lane, with appropriate mitigation. The Council's highways officers do not object to this.</p> <p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have</p>

Respondent (with lpr ref)	Response	Council Response
		<p>been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p>
Kathryn Bassant (lpr55)	<p>Could you please explain why the following areas are included in Policy SP 14 Sites allocated for residential development in Eastern Area:</p> <p><b>RSA18 HSA15</b> Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common 100</p> <p><b>RSA19 HSA16</b> Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common 60 (Some development has already taken place on this site but as far as I am aware planning permission has not been granted for further development)</p> <p>Both sites fall within the DEPZ of Burghfield AWE and Policy SP 4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield states "In the interests of public safety, residential(9) development in the Detailed Emergency Planning Zone (DEPZ)(10) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, <b>especially when the Office for Nuclear Regulation (ONR) has advised against that development.</b>"</p>	<p>Comments noted.</p> <p><u>Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common</u></p> <p>Planning permission on this site (ref: 22/00325/RESMAJ) was approved before the new DEPZ for AWE Burghfield was determined. The Council's Emergency Planning Team have not objected to the development of the site.</p> <p><u>Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common</u></p> <p>The allocation is proposed to be removed from the Local Plan Review (LPR) following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as development had not yet been built out. The site does not have planning permission for residential development.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However,</p>

Respondent (with lpr ref)	Response	Council Response
		<p>since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.</p> <p>The Council's Emergency Planning Team and the AWE object to the development.</p>
Helen Marek (lpr56)	<p>Object to policy.</p> <p>Theale is no longer a village. There have been so many planning applications granted over the past few years, that should not have been granted.</p> <p>The planning applications to build on land between the north end of Theale High Street and the M4 are totally unacceptable. The application for 170 houses would stretch limited resources, e.g. for The Medical Centre, beyond capability. The application to build offices on land which is highly susceptible to flooding is preposterous and consequently puts houses in that area in greater risk of being flooded. This is a housing area, not an industrial estate.</p> <p>Changes sought: The above applications should NOT be granted. Offices should be put on the other side of the A4 in the Industrial estate, not in the housing area.</p>	<p>Comments noted.</p> <p>Following the publication of the Regulation 18 version of the Local Plan the three Theale sites have been subject to a Landscape Sensitivity and Capacity Assessment (LCA). The developable areas of the two residential sites are limited to the settlement side of the overhead power lines, which also responds to comments of the National Grid. Certain design parameters are recommended, including a density of 30 dwellings per hectare, limit to 2 storey development; and creating a positive interface to the existing public open space. To this end the development potential has reduced. In the case of the former Sewage Treatment Works this has reduced to 60, and for Whitehart Meadows this has reduced to 40. The policy will be updated to reflect the changes in the housing numbers.</p>

Respondent (with lpr ref)	Response	Council Response
		Further to landscape advice the proposed offices on land at Hoad Way will not form part of the submission version of the Local Plan.
Zoe Freedman (lpr61)	<p>Object to policy.</p> <p>I object to two sites which are local to me and so I know details about them. I am only not commenting re. other sites as I do not have information on them.</p> <p>Whitehart Meadow, Theale. The reasons to object to this as a site for homes are:</p> <ul style="list-style-type: none"> <li>• Flood risk</li> <li>• High voltage overhead power lines cross the site</li> <li>• Noise and pollution from the motorway</li> <li>• Possible land contamination</li> <li>• Need to preserve the gap between Theale and Calcot/Tilehurst</li> </ul> <p>Former sewage treatment works, Theale. The reasons to object to this site as a place for homes are:</p> <ul style="list-style-type: none"> <li>• Flood risk</li> <li>• High voltage overhead power lines cross the site</li> <li>• Noise and pollution from the motorway</li> <li>• Contaminated land</li> <li>• Need to preserve the gap between Theale and Calcot/Tilehurst</li> <li>• Unsuitable access via single-track Blossom Lane and Crown Lane</li> <li>• Impact on the Area of Outstanding Natural Beauty.</li> </ul>	<p>Comments noted.</p> <p><u>Whitehart Meadow (RSA16):</u></p> <ul style="list-style-type: none"> <li>• The site has been the subject of a challenge to the Flood Zone designation (landowner led), where the Environment Agency has altered the area of flood risk. The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application;</li> <li>• A buffer would be maintained between the overhead power lines and residential development, as guided by the National Grid. Development would not extend to the north-east of the overhead power lines;</li> <li>• It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation;</li> <li>• The policy requires the submission of a contamination report, identifying any mitigation should it be necessary;</li> <li>• It is important for the development (and taking into account the Sewage Treatment Works) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>Both these sites are unsuitable for housing for a number of strong reasons, as I have said above. I'm sure there are possible uses that could be made of the land, for example, as community green spaces or nature reserves. However, the possible land contamination may be an issue with any such use.</p>	<p>development is focused to the west of the pylons, allowing open space and a landscaped buffer. The dwelling number has been reduced to approximately 40.</p> <p><u>Former Sewage Treatment Works (RSA17):</u></p> <ul style="list-style-type: none"> <li>• The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application;</li> <li>• A buffer would be maintained between the overhead power lines and residential development, as guided by the National Grid. Development would not extend to the north of the overhead power lines;</li> <li>• It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation;</li> <li>• Environmental Health officers note that there is a high risk of contamination at the site. This does not necessarily rule out development, and investigation, plus any remediation and possible future monitoring may be required. This is usually a planning condition with a planning permission, and was recommended for planning application 16/02850/OUTMAJ. The policy requires the submission of a contamination report, identifying any mitigation and remediation. The planning application 16/02850/OUTMAJ did not raise any viability issues in respect of contamination, as reports submitted with the application did not preclude development;</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<ul style="list-style-type: none"> <li>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping. The dwelling number has been reduced to approximately 60;</li> <li>Access will be via Blossom Lane, with appropriate mitigation. The Council's highways officers do not object to this.</li> </ul> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
Jack Nunn (lpr109)	<p>Object to policy.</p> <p>The site referenced RSA016 is a flood risk area, contains high power voltage overhead lines and will increase noise pollution due to the removal of the trees between the Woodfield Way housing estate and the M4. There is also a risk that this land is contaminated.</p> <p>The site referenced RSA017 is a flood risk area, contains high power voltage overhead lines and will increase noise pollution due to the removal of the trees between the Woodfield Way and Blossom Lane housing estates and the M4. The land on this site is contaminated and is only accessible via a single track lane via Blossom lane.</p> <p>In addition there is already approved housing plans of over 400 properties in the north end of Theale. The villages infrastructure, schools and doctors surgery can not cope with an additional population that 570 homes would create.</p> <p>Changes sought:</p>	<p>Comments noted.</p> <p><u>Whitehart Meadow (RSA16):</u></p> <ul style="list-style-type: none"> <li>The site has been the subject of a challenge to the Flood Zone designation (landowner led), where the Environment Agency has altered the area of flood risk. The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application;</li> <li>A buffer would be maintained between the overhead power lines and residential development, as guided by the National Grid. Development would not extend to the north-east of the overhead power lines;</li> <li>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some</li> </ul>



Respondent (with lpr ref)	Response	Council Response
	<p>I would prefer that properties were approved on land that is suitable and appropriate for the size of the proposed development. Any development should also include areas for local shops, recreation, schooling and health facilities.</p>	<p>landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation;</p> <ul style="list-style-type: none"> <li>• The policy requires the submission of a contamination report, identifying any mitigation should it be necessary;</li> <li>• It is important for the development (and taking into account the Sewage Treatment Works) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to the west of the pylons, allowing open space and a landscaped buffer. The dwelling number has been reduced to approximately 40.</li> </ul> <p><u>Former Sewage Treatment Works (RSA17):</u></p> <ul style="list-style-type: none"> <li>• The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application;</li> <li>• A buffer would be maintained between the overhead power lines and residential development, as guided by the National Grid. Development would not extend to the north of the overhead power lines;</li> <li>• It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation;</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<ul style="list-style-type: none"> <li>• Environmental Health officers note that there is a high risk of contamination at the site. This does not necessarily rule out development, and investigation, plus any remediation and possible future monitoring may be required. This is usually a planning condition with a planning permission, and was recommended for planning application 16/02850/OUTMAJ. The policy requires the submission of a contamination report, identifying any mitigation and remediation. The planning application 16/02850/OUTMAJ did not raise any viability issues in respect of contamination, as reports submitted with the application did not preclude development;</li> <li>• It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping. The dwelling number has been reduced to approximately 60;</li> <li>• Access will be via Blossom Lane, with appropriate mitigation. The Council's highways officers do not object to this.</li> </ul> <p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
Gary Miles (lpr242)	<p>Object to policy.</p> <p>Objection: Why is Theale yet again on the list? Why is Theale earmarked for a 'large site'? Over the past 10 years lots of small developments have happened in the village most of which have gone unnoticed by majority of residents. Circa 111 homes built to date with planning already past for North and South Lake of circa 350 plus the recently passed plans for circa 100 homes on The Green, total already past for building 450! I object for the following reasons: 1. our sewerage system is already overcrowded - the sewage backs up and we constantly have Thames Water in the village moving the sewage around, pulling it through or pumping it out. We have personally had TW out for this exact reason. 2. Infrastructure such as roads are narrow, the High Street is a conservation area and already heavily used by large overweight vehicles as a short cut when the A4 bypass is queuing. 3. It currently takes 4 weeks to get a face to face doctors appointment and 2 weeks for a phone call appointment! Are you planning on building a new surgery with more doctors? We recently fought for the new school for the reasons that they had outgrown their previous site - if we have more housing built in Theale then we will be right back where we started - overcrowded classrooms of 40 kids and add-ons built to the school to accommodate the new houses. We feel let down by WBC as it always feels like they push any developments all the way to the Eastern end of the county. I ask you this- where are all the proposed houses for neighbouring villages such as: Englefield? Tidmarsh? Sulham? Upper Basildon? Bradfield? Chapel Row? Beenham? Brimpton? East Ilsley? Lambourne? to name a few. I object mainly because we have already got planning for circa 450 without the</p>	<p>Comments noted.</p> <p>It is appreciated that Theale has development proposed on the western side, and has yet to be built.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations. Therefore, it is appropriate to allocate sites in Theale. All of the settlements suggested, bar Lambourn and Bradfield, fall outside of the settlement hierarchy and are not suitable locations for housing of such numbers. Housing allocations are proposed for Lambourn and Bradfield Southend.</p> <p>Landscape evidence for the two proposed sites result in a reduction in housing numbers, to approximately 40 on Whitehart Meadow and approximately 60 on the former Sewage Treatment Works.</p> <p>Thames Water commented that the scale of both sites would require upgrades of the water supply network and drainage infrastructure. It is recommended that the site</p>

Respondent (with lpr ref)	Response	Council Response
	<p>additional 170 without any mention of updating any infrastructure/school and Doctors surgery!</p> <p>Changes sought: I am asking WBC to leave Theale alone on this occasion and concentrate on building and spoiling the other villages listed above. My preferred approach would be for the passed planning to be built circa 450 homes and then we can see how it affects the village before committing us to more homes. Take for instance Mortimer - They had Strawberry Field built circa 12 years ago with approx 125 homes and I see there is another 110 homes planned for up to 2026 a total of 235 homes in the past 10 years (Wow) but this is still considerably less than the 450 planned plus 111 built plus 170 homes planned for Theale? it just does not make sense.</p>	<p>specific policies will include a requirement for the applicant to provide a water supply and drainage strategy, and for the development to be occupied in line with the strategy.</p> <p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
L Bahrani (lpr502)	<p>Object to policy.</p> <p>I wish to formally register my comments and objections in respect to the West Berkshire Local Plan Review referenced above.</p> <p>The plan, specifically the sites proposed for residential and commercial development, raises many serious concerns with respect to its impact on the village of Theale, the residents of the village, and the wider area.</p> <p>A non-exhaustive list of comments and objections is presented as follows:</p>	<p>Comments noted.</p> <p><u>Conservation Area:</u></p> <p>The Council has a duty to consider the setting of the Conservation Area as all three sites are near to the eastern boundary. No trees would be affected by the developments. There are concerns regarding the proposed employment site on land at Hoads Way and its impact on the conservation area, and is one reason for removing this site for the submission version of the plan.</p> <p><u>Neighbour impact:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Conservation Area</b></p> <p>Sites identified for inclusion in the LPR (Local Plan Review) encompass those designated as a <b>Conservation Area</b> and setting, and is thus subject to protection as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as per Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act and as designated under Article 50 of the Planning (NI) Order 1991.</p> <p>Conservation Areas are also notable for their biodiversity value. Protected species and habitats need to be addressed when reviewing buildings, sites and planning works. See further point on <b>Destruction of wildlife habitat and protected species</b>.</p> <p>In addition, trees in a Conservation Area are automatically protected as if a Tree Preservation Order (TPO) was in place.</p> <p><b>Invasion of privacy of Theale residents (esp. 60-89 High Street)</b></p> <p>The overlook that will result from the sites identified for inclusion in the LPR will pose serious privacy issues especially for the surrounding properties i.e. 60-89 High Street, Theale. As per Article 8 of the Human Rights Act states a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.</p> <p><b>Agricultural Land Classification (ALC)</b></p> <p>Natural England records that sites identified and proposed for inclusion in the LPR are graded ALC and thus the land should be protected from development under the government policies and legislation to preserve the</p>	<p>Detailed design would be considered through the assessment of a planning application. The design would need to consider Local Plan policies as well as the site allocation policies, including residential amenity, and design.</p> <p><u>Agricultural Land Classification:</u></p> <p>The sites are Grade 3 agricultural land, though it is not known whether this is Grade 3a or 3b. However, the previous planning applications were not refused/withdrawn based on use of Best and Most Versatile Land.</p> <p><u>Flooding:</u></p> <p>The developable area for any proposed sites would not be within Flood Zone 2, and each site allocation policy includes a criterion that no development would be permitted in this area. A Flood Risk Assessment and SuDS (Sustainable Drainage Systems) scheme would also need to accompany a planning application.</p> <p><u>Ecology</u></p> <p>An Ecological Impact Assessment will be needed for each of the allocated sites.</p> <p><u>Highway safety:</u></p> <p>The Council's Highways department has reviewed the sites in Theale and do not object in principle. Transport Assessments and appropriate mitigation will be required for each development.</p> <p><u>Noise/Air/Light/Visual Pollution</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals.</p> <p><b>Flood Risk, Ground Stability and Drainage</b></p> <p>The Environment Agency designates sites identified for inclusion in the LPR as at <b>HIGH RISK</b> from surface water flooding. The eradication of natural ground absorption inherent to this proposal will heighten this risk status for Theale village and adversely affect the foundational integrity of nearby properties and subsequently elevate Home &amp; Buildings insurance premium rates for the surrounding area.</p> <p><b>Destruction of wildlife habitat and protected species</b></p> <p>The destruction of habitation required for the sites identified and proposed for inclusion in the LPR development would lead to a further decline in wildlife species such as deer, rabbit, birds, bats and hedgehogs.</p> <p>Hedgehogs are listed as a <b>Species of Principle Importance in England</b> under the Natural Environment and Rural Communities (NERC) Act 2006 Section 41 making hedgehogs a material consideration for Local Planning Authorities (LPAs) during the planning process.</p> <p><b>Highway safety, inadequate parking and access</b></p> <p>Theale village is already vastly strained with traffic and parking issues; development on the sites identified and proposed for inclusion in the LPR proposal will only serve to escalate these issues and stands in direct contradiction with both government and local council policies on congestion and pollution alleviation. Parking facilities in Theale are already oversubscribed and the proposed development would lead to an increase in traffic and parking issues correlating inversely with a decrease in highway safety.</p>	<p>This policy considers housing development, not commercial. Residential development will be expected to respond to climate change, in terms of sustainable construction. A noise and air quality assessment will be required for the two new proposed allocations, with appropriate mitigation. The design will need to be respectful of neighbour amenity as required by other development management policies.</p> <p><u>Natural light:</u></p> <p>Right to Light is a separate legal matter to planning. As highlighted above, detailed design would be subject to consideration of other Local Plan policies, such as residential amenity and design.</p> <p><u>Character</u></p> <p>It is important for the newly proposed development to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of each site. The policies contains criteria which guide development and associated landscaping. The dwelling number has been reduced to approximately 60 on the former sewage treatment works and 40 on Whitehart Meadow.</p> <p><u>Post-pandemic:</u></p> <p>See responses to SP21. SP14 is a housing based policy.</p> <p><u>Housing numbers:</u></p>

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	<p><b>Noise/Air/Light/Visual Pollution</b></p> <p>Additional development of both commercial and residential nature will increase noise, air, light and visual pollution in Theale village both during and post-construction, with particular impact on residents of 60-89 High Street and Woodfield Way as the parallel properties to two of the sites included.</p> <p><b>Loss of natural light</b></p> <p>Sites identified and proposed for inclusion in the LPR are in extremely close proximity to numerous residential properties that have benefited from natural space and light for over 20 years. The proposed development would contravene the fair and reasonable 'right to light' claim by residents resulting from the obscuration of a South-East solar trajectory.</p> <p><b>Negative alteration to the character and nature of Theale village</b></p> <p>The encroachment on green space and increased commercial development will erode the character of the village as a predominantly residential settlement.</p> <p><b>Requirement for Post-Pandemic Reconsideration</b></p> <p>The LPR is based on studies and requirement predictions based on a pre-pandemic environment and as such are now invalidated due to the rapidly shifting socioeconomic conditions. It is increasingly apparent that more people are now working from home thus reducing the demand for commercial office related premises which is of particular pertinence to the proposal for 20,000 sqM of office space in Theale.</p> <p><b>Excessive/Exaggerated Targeting</b></p>	<p>There are no planned dwellings at the Newbury London Road Industrial Estate.</p> <p>It is accepted that the Council are proposing a housing requirement that exceeds the LHN. The objective is to boost housing supply and include sufficient flexibility to ensure that, as a minimum, the Local Housing Need can be met.</p> <p><u>Development Management policies:</u></p> <p>The submission version of the Plan includes detailed criteria for the new site allocation policies, including those at Theale.</p> <p><u>Sustainability Appraisal:</u></p> <p>The Sustainability Appraisal will be updated for the submission version of the Plan.</p> <p><u>Changes to the policy</u></p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The LPR proposes an excess of proposed residential developments beyond the targeted 520 - 575 homes per year and instead contains proposals for a pro-rata development of 599 homes per year which represents an excessive and unrealistic overreach.</p> <p>Further, the LPR allocation fails to account for the up to 500 flats West Berkshire Council intends to build in Newbury at the London Road Industrial Estate.</p> <p>In addition, the 170 homes proposed for Theale would be above the 440 homes on the western side of Theale that have been given planning permission but not yet built.</p> <p><b>Deficient Development Control Policies</b></p> <p>The development control policies relating to some sites identified for inclusion in the LPR, which include all those affecting Theale, are incomplete.</p> <p><b>Deficient Sustainability Appraisal</b></p> <p>There is current no completed sustainability appraisal of the plan which would doubtless reveal the detrimental impact to the environment due to the proposals and details contained in the LPR for the environment.</p> <p>In conclusion this LPR should be roundly rejected as it stands in direct contradiction to myriad land/heritage conservation policies and would also be to the detriment of the quality, character, safety and amenity value of the area, as outlined in the points above.</p>	
Mario Grana (lpr505)	<p>Object to policy.</p> <p>Theale is slowly losing its village character as more homes/offices are being built. Such projects normally do not involve any provision for extra health</p>	<p>Comments noted.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and</p>



Respondent (with lpr ref)	Response	Council Response
	<p>care or sanitation. Theale has a very small GP that can barely cope with demand as it is. Traffic is increasing. Totally oppose any extra housing or offices in our village.</p> <p>Such plans should be cancelled.</p>	<p>Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations. Therefore, it is appropriate to allocate further sites in Theale.</p> <p>By seeking to place development in existing settlements with good transport links, and access to services, this may aid in reducing the need to travel. Development will need to mitigate it's impact on highway junctions, and transport assessments</p> <p>Thames Water commented that the scale of both sites would require upgrades of the water supply network and drainage infrastructure. It is recommended that the site specific policies will include a requirement for the applicant to provide a water supply and drainage strategy, and for the development to be occupied in line with the strategy.</p> <p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Following landscape advice the proposed offices on land at Hoads Way will not form part of the submission version of the Local Plan.</p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
Rhona Johnson (lpr516)	<p>Object to policy.</p> <p>The planned proposals for Theale - whitehart meadow, on the old sewage works and between J12 and Hoad way are going to be horridous for three main reasons,</p> <p>Firstly - all the sites are presently green open spaces used to exercise, dog walk and take in outside -- non concreted land... unlike pavements, roads and motorways. It is also full of wildlife, hedgerows and shrubs and trees in places which the population of the village value having as communal outdoor space.</p> <p>Secondly the village schools, doctors and dentists are full - the roads v.busty at rush hour time -- Theale cannot support extra housing.</p> <p>Thirdly the green open land between the motorway and the start of the present housing is the break before Reading starts -- Calcot. --- Theale would just join up with the motorway and Calcot, Reading --- just a whole mass of concrete and urban sprawl -- with the M4 + 2 massive electricity masts in the middle of the proposed land in Whitehart meadow.</p> <p>Getting out of Theale with the business park traffic in rush hour is v.hard as it with this amount of population.</p> <p>The 3 proposals for extra housing at whitehart meadow, Theale sewage works and the land by J12 and Hoad way are totally out of keeping with the</p>	<p>Comments noted.</p> <p>Comments relating to offices can be found under the Council responses to SP21.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow and the former Sewage Treatment Works are subject of a LCA. The LCAs identifies a number of landscape receptors which could be affected by development on site.</p> <p>Development only across the plan period could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be</p>

Respondent (with lpr ref)	Response	Council Response
	<p>layout of the village next to J12. We need the green space as a buffer to the motorway and to keep the sense of Theale being a village -- split away from the M4 -- just a little -- and knowing we are seperate from Calcot / Reading.</p>	<p>required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
<p>Harvey Fletcher (lpr542)</p>	<p>Object to policy.</p> <p>I object to RSA16, the proposed allocation for mixed-use development in Whitehart meadow for the following reasons:</p> <ul style="list-style-type: none"> <li>• Inadequate road access will put too much traffic through the small roundabout on Theale high street and cause excess noise pollution</li> <li>• The development will negatively affect the Theale High Street conservation area</li> <li>• I do not want to look out my window and see offices and houses, I would much rather see the open green space which is there now. The proposed site is right next to my residence.</li> <li>• There is no demand for office space in this area. Half of the current existing Arlington business park is vacant.</li> <li>• The noise levels from the motorway (M4) would make it uncomfortable for residents of the proposed housing.</li> </ul>	<p>Comments noted.</p> <p><u>RSA16 Whitehart Meadow</u> The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p> <p>The conservation officer has not objected to the proposal based on the impact on the conservation area.</p> <p>The development will be visible from existing dwellings, though planning policies are in place in the Local Plan to protect amenity. Sufficient distances shall be maintained and good design will be required. It is important that the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>I object to the proposed development for RSA17 "former sewage works" on the following grounds:</p> <ul style="list-style-type: none"> <li>• Too close to M4 (noise pollution too much for housing)</li> <li>• Not enough access, all traffic would be sent down Blossom lane, which is a single lane track</li> <li>• The site is a flood risk</li> <li>• Housing would negatively impact area of natural beauty</li> </ul> <p>Changes sought: I do not want the proposed changes for RSA16 or RSA17 approved.</p>	<p>development integrates with existing development, rather than as a stand alone development.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The site would not accommodate any offices.</p> <p><u>RSA17 former Sewage Treatment Works</u> It is recognised that the site is in close proximity to the M4. The restraint on the location of housing and landscaping should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development</p>

Respondent (with lpr ref)	Response	Council Response
		<p>would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping.</p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
Zoe Benford (lpr633)	<p>Object to policy.</p> <p>Theale has always been a village with its own community, this building work would remove the gap between Theale and Calcot. we would lose some of our history. We want to remain a village.</p> <p>That field regularly has flooding, with global warmer not going away, flooding is only going to get worst. It is unsuitable land for this use. There is also overhead high voltage power lines and an electricity pylon in that area.</p> <p>This would have a very negative effect on the Theale High Street (more traffic congestive, more pollution, busier shops) It may also make our services such as the doctors even busier than they already are.</p> <p>Deer, pheasants, birds use the field, we do not want to lose more green space</p> <p>The council REALLY needs to stop trying to build on any tiny bit of green space that we have left here.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow and the former Sewage Treatment Works are subject of a LCA. The LCAs identifies a number of landscape receptors which could be affected by development on site. Development only across the side of the site closest to the existing built up area could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p>

Respondent (with lpr ref)	Response	Council Response
	I do not want this to go ahead, there is no compromise on this for me	<p>An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>No development would be within Flood Zone 2 or permitted within this zone. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>Ecology surveys would be required together with any mitigation.</p> <p>The number of dwellings would be reduced for both sites, based on the landscape evidence, as outlined above.</p>
Alisa Claybourn (lpr732)	<p>Object to policy.</p> <p>I had agreed with the site allocation, but the application to build on Pincents Hill, published just before the Local Plan consultation closes, has thrown a whole different light on the Plan. I live on the western edge of Tilehurst and am a naturalist and walker. The developments at Stoneham Farm, and , earlier, at The Ridings, have put my local environment under much added pressure. Sulham Woods are suffering from increased footfall as a result of</p>	<p>Comments noted.</p> <p>Development in West Berkshire is required to comply with the spatial strategy as set out in policy SP1, and the focus of development will follow the District-wide settlement hierarchy. The purpose of the settlement hierarchy is to direct development towards the most sustainable locations.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Covid and exhortations to us all to care for our well-being by walking in the countryside. Parking on Sulham Hill has caused serious traffic safety issues during the current Lockdown, and though yellow lines have been added (thank you) parking is still an issue. Footpath erosion and trespassing on fields of crops are increasing.</p> <p>Building 265 houses at the southern end of Sulham Woods is going to lead to this vital outdoor amenity, crucial greenspace and area of conservation importance (particularly as it abutts the SSSI at Moor Copse, one of BBOWT's nature reserves) suffering a substantial "squeeze" from each end. I could, albeit grudgingly, accept the building at Stoneham's Farm in the Local Plan, as well as the Care Home on the same site, but the Pincent's Lane proposal is the ton of straw that's broken this camel's back.</p> <p>Changes Sought: Limit development in Tilehurst/Calcot to what's in the Local Plan as it stands. Please don't put any more pressure on the Sulham Woods/Moor Copse area.</p>	<p>At the top of the settlement hierarchy are Urban Areas. These are the focus for housing and economic development due to the level of facilities/services, together with accessibility. The Urban Areas in the District include the Eastern Urban Area which comprises of Tilehurst, Calcot, and Purley on Thames.</p> <p>No new allocations in Tilehurst were included in the emerging draft of the Local Plan Review, and this is because Tilehurst Parish Council had expressed an intention to include residential allocations in the Neighbourhood Plan that they are developing.</p> <p>A planning application for up to 165 dwellings on Land East of Pincent's Hill (ref: 19/00113/OUTMAJ), in Tilehurst was received in 2019. It was refused at Eastern Area Planning Committee on 19 January 2022 contrary to the officer recommendation. It was subsequently considered at District Planning Committee whereby it was refused.</p>
Matthew Mackmin (lpr751)	<p>Object to policy.</p> <p>I write raising a number of issues for consideration in relation to the review of the local plan that is currently out for consultation. These issues relate to the following specific proposals:</p> <ul style="list-style-type: none"> <li>• 100 homes on Whitehart Meadow (RSA16);</li> <li>• 70 homes on the site of the old Theale sewage works (RSA17);</li> <li>• 20,000 square metres of new office space on the field next to M4 junction 12 (EMP6). (see lpr818)</li> </ul> <p>In relation to the development at the old Theale sewage works (RSA17) my objections are:</p>	<p>Comments noted (comments for office under SP21)</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations. Therefore, it is appropriate to allocate further sites in Theale.</p> <p><u>Previous rejection of the site</u></p> <p>Since the Housing Site Allocations examination both sites have been subject of planning applications. A number of</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>1: Previous rejection of the site in the Local Plan</b></p> <p>The site has previously been rejected (as THE001) for inclusion in the local development plan for the Eastern Spatial Area and previous applications for development on the site have been rejected and the site is no longer recommended for allocation. There is nothing included in this review that is materially different from previous applications for development that have been rejected for inclusion in the local development plan. The proposal for development also offers no material change from the one rejected (for a number of reasons) by the Secretary for State, nor have any of the reasons for rejection been addressed within this proposal.</p> <p><b>2: Proposed number of dwellings and density</b></p> <p>The site (as THE001) was previously assessed under the “Eastern Area – Site Assessments” as potentially partially suitable for development for 57 dwellings (1.9ha at 30 dph), revised downward from 138 dwellings (3.45ha at 40dph). This application is for 77 dwellings, a 36% increase on the number in the submission rejected for inclusion in the local development plan.</p> <p><b>3: Viability of access during development</b></p> <p>The site (as RSA17) of the former sewage works is located at the end of Blossom Lane. Blossom Lane narrows to single track once past Chestnut Close and is not suitable for construction traffic. Blossom Lane in general suffers from width restrictions due to on-road parking and overhang/protrusion of vehicles parked off-road into the right of way. Blossom Lane also leads into Crown Lane for access to the High Street. Crown Lane also suffers from width restriction due to on-road parking and is not suited to construction traffic.</p> <p>Alternate access from Blossom Lane might be sought via Blossom Avenue (to Play Platt and the Englefield Road) to avoid parts of Blossom Lane and</p>	<p>technical matters have been resolved, including access. The Whitehart Meadow site has been subject of a challenge to the Flood Zone designation, where the Environment Agency has amended the area of flood risk. Landscape Sensitivity and Capacity Assessments (LCA) have been undertaken for both Theale housing sites, recommending a developable area, and a number of parameters to take account of, in terms of dwelling height, landscape buffer, tree planting, and integration of development with the adjacent public open space.</p> <p><u>Proposed housing numbers</u> Both sites have been subject to further landscape assessments which limit the developable area. Housing numbers will be reduced to approximately 40 on Whitehart Meadow and approximately 60 on the former Sewage Treatment Works.</p> <p><u>Access</u> By seeking to place development in existing settlements with good transport links, and access to services, this may aid in reducing the need to travel. Development will need to mitigate its impact on highway junctions, and transport assessments. The Council's highway engineers do not object to the accesses for the sites in principle.</p> <p><u>Infrastructure</u> An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p>



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	<p>Crown Lane, but Blossom Avenue is also afflicted by the same issues of on-road parking and attendant width restrictions as Blossom Avenue and Crown Lane.</p> <p><b>4: Viability of access post construction and pedestrian safety</b></p> <p>With 77 dwellings and an average of 1.4 cars per dwelling (based on the South-East Region of the U.K. according to Government statistics [nts9902] the development shall deliver at least 108 additional vehicles onto Blossom Lane in the AM and PM peaks with additional traffic being predictable throughout the day at weekends. With 40% of households having two or more cars/vans (rising to 42% for rural towns such as Theale) it is feasible that actual additional vehicles and attendant traffic shall be much higher. Blossom Lane and Crown Lane (providing the only viable access from the proposed development to the high street) are ill-suited to additional volumes of traffic for the reasons stated in (3). It is unlikely that additional traffic shall egress the site of the proposed development via Blossom Lane and Blossom Avenue as this routes to the Englefield Road and represents a less convenient means of access to the High Street and routes out of the village to the A4, M4 and beyond. Blossom Avenue also has issues with on-street parking reducing the available width for traffic flow. It is therefore likely that the vast majority, if not all, of this additional vehicular traffic shall seek to traverse Blossom Lane and Crown Lane.</p> <p>The pavement along Blossom Lane is non-existent past Chestnut Close and extremely narrow along the Southern edge for the entirety of Blossom Lane, meaning people including those with young children on bicycles or in buggies/pushchairs and prams are often and frequently required to enter the road. It is also the case that there shall be no contiguous footpath access from the site of the proposed development to the High Street.</p>	<p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p><u>Technical objections</u></p> <p>The site at Whitehart Meadow has been subject of a flood risk zone challenge. No development will occur in flood zone 2 on either RSA16 or RSA17. The Environment Agency commented, in response to the proposed allocations, that a buffer zones will be required either side of Sulham Brook, and an ecological assessment will be required. Both requirements are set out in the policies for RSA16 and RSA17.</p> <p>National Grid advised of the buffer zones at the overhead power lines, and this has been built into the policy criterion for RSA16 and RSA17.</p> <p>Thames Water comment that upgrades to the water and wastewater network infrastructure will be required. This has been built into the policy criterion for RSA16 and RSA17.</p> <p><u>Character</u></p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow and the former Sewage Treatment Works are subject of a LCA. The LCAs identifies a number of landscape receptors</p>

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	<p>I also question the ability to ensure safe and unfettered access for blue light Emergency services to the proposed site given the aforementioned restrictions on Crown Lane and Blossom Lane.</p> <p>Widening Blossom Lane and Crown Lane shall prove impossible given the proximity of private property to both sides of both Lanes, and this becomes even more problematic when one considered the need to increase the width of the footpath(s).</p> <p><b>5: Infrastructure</b></p> <p>West Berkshire Council's own Core Strategy and Local Development Plan for the Eastern Area, as well as the Submission for Housing Site Allocation DPD (November 2015) state that given the extant planning permission for 350 dwellings at Lakeside along with inclusion in the plan for development [100 dwellings] at The Green (land adjacent to The Green/A340) there would need to be a period of consolidation to allow the infrastructure, facilities and services of the village to catch up with the rate of development and population growth. Given that:</p> <ul style="list-style-type: none"> <li>• Theale Library is apparently still under review for closure by West Berkshire Council;</li> <li>• The village no longer has a Bank following the closure of the Lloyds branch;</li> <li>• It is possible that the Post Office might close;</li> <li>• It is possible that the Pharmacy on the High-Street might close;</li> <li>• Theale Medical Centre is extremely busy and appointments are very hard to come by;</li> <li>• Extant planning permission for Lakeside and proposals already agreed within the Local Development Plan will deliver an additional 435 dwellings within the settlement boundary which will place an immediate burden on the current infrastructure including the current and proposed new primary school;</li> <li>• There is limited provision for young children within the village;</li> </ul>	<p>which could be affected by development on site. Development only across the side of the site closest to the existing built up area could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way. This is to protect the setting of the AONB as well as the space between Theale and Calcot.</p> <p><u>Proximity to M4</u></p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p><u>Cumulative development</u></p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations. Therefore, it is appropriate to allocate further sites in Theale.</p>

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	<ul style="list-style-type: none"> <li>• There is limited provision for older children within the village;</li> <li>• Rail services from Theale to Reading and (direct to) London Paddington are already extremely busy in the AM and PM peak periods as well as at weekends with limited capacity to increase capacity;</li> <li>• Thames Water has stated that the current infrastructure is unlikely to be able to provide supply (clean and wastewater service) to the site;</li> <li>• The sewage system in Theale is already unable to cope effectively.</li> </ul> <p>It is plausible that one might make the argument that the local infrastructure, facilities and services are likely to be inadequate to accommodate the already agreed development, let alone development extraneous to the agreed local plan.</p> <p><b>6: Objections from official agencies and bodies</b></p> <p>The Environment Agency has expressed a strong recommendation that the site should not be used for development. Fully 40% of the site falls within “Flood Zone 2”. There is an ordinary watercourse on the site and the site sits atop a major aquifer and is a site subject to groundwater emergence and regular and extensive surface flooding. The Environment Agency has also indicated that there is a high risk of ground water contamination.</p> <p>National Grid has previously expressed its objection to development at the site as the site is beneath high voltage transmission lines and a pylon is presently situation on the site and has stated the following:</p> <p>Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore, we advise developers</p>	<p><u>Contamination</u> The site specific policies for RSA16 and RSA17 requires the submission of a contamination report, identifying any mitigation should it be necessary.</p> <p><u>Economic benefits</u> There are short term economic benefits in the construction phase. An increase in residents aids in supporting local services and public transport infrastructure.</p> <p>The remaining comments have already been responded to above.</p>

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	<p>and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.</p> <p>National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>Thames Water has expressed the opinion that the current infrastructure is unlikely to be able to provide supply (clean and wastewater service) to the site.</p> <p><b>7: The site is poorly suited to development from an ecological perspective and is poorly related to the existing settlement at Theale</b></p> <p>The site is adjacent to ancient woodland and adjacent to an Area of Outstanding Natural Beauty (AONB). It is highly likely that the development of additional dwellings at this site shall have a negative impact on the view from areas within this AONB.</p>	

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	<p>There are no positive ecological benefits to the proposed development according to the Council’s own “SA/SEA (Appendix 9B) Eastern Area Site Assessment” document.</p> <p>The site is also poorly related to the existing settlement and falls outside of the existing settlement boundary for Theale. It would also erode the “strategic gap” between Theale and the M4 motorway and buildings at the eastern edge of Reading (namely the Pincents Lane development and the Ikea superstore). The landscape assessment states that buffers would be required between the existing settlement edge and the site (to Blossom Lane and Woodfield Way) further increasing the distance between the proposed development and the existing settlement. A buffer would also be required to the Sulham Brook bank.</p> <p>Additional traffic related to the propose dwellings at the site will contribute to worsening the air quality for residents of the Blossom Lane/Crown Lane areas of Theale as well as contribute to additional traffic on the High-Street which is already congested in the AM and PM peak periods and at weekends.</p> <p><b>8: Proximity of the M4 and A4, traffic and air quality</b></p> <p>The proximity of both the M4 and A4 which are both be adjacent to the site raises questions of air quality at the site.</p> <p>The additional traffic attributable to the development is likely to contribute to the existing congestion on the High-Street and at the junction to join the A4 at the Northern end of the village and to join the A4/A340 at the Southern end of the village. This traffic will also contribute to exacerbating congestion at Junction 12 of the M4 adjacent to the village – a situation unlikely to be helped by the inclusion of sites EUA025 (150-200 dwellings) and EUA026 (35 dwellings) adjacent to the junction for allocation in the local development plan for the Eastern Area (under Calcot).</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The additional traffic is also likely to exacerbate congestion on the High Street, already frequently used as a “rat run” for those seeking access to Englefield and Pangbourne whilst avoiding the junction with the A4/A340 (Roundabout) at the Southern end of the village.</p> <p><b>9: Substantive existing development, extant planning permission and allocation within the local plan</b></p> <p>Theale has already seen substantive development in recent years with development at The Lamb, Play Platt, Cumber Place, Angel Court and Fletcher Court. There is extant planning permission for 350 dwellings at Lakeside and allocation within the local development plan for a further 115 dwellings (15 at THE003 and 100 at THE009 as was in the previous version of the local plan). This represents a substantive contribution (33%) of the 1400 dwellings required by the Core Strategy between 2006 and 2026 across the Eastern Area comprising of Calcot, Tilehurst, Purley-on-Thames and Theale. It should be possible for the remaining 67% of the 1400 dwellings called for within the Core Strategy over the next decade (through 2026) to be distributed across the areas of Calcot, Tilehurst and Purley-on-Thames.</p> <p>Further, the level of development already agreed (extant permission) and considered within the agreed local plan amounts to 465 dwellings, including the major development at Lakeside which is proposed to be predominately flatted. On a conservative estimate of 2 persons per dwelling this is an additional 930 residents on top of a population of 2835 (2011 census) – an increase of 33%. On a more reasonable assumption of an average 2.5 persons per dwelling this represents an increase of 1163 additional residents – an increase of over 40% on the present population.</p> <p>The additional number of dwellings (465) represents an increase of 38% on the existing 1252 dwellings (2011 census).</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>This is not sustainable for a small village.</p> <p><b>10: Contamination at the site (land contamination)</b></p> <p>It is widely acknowledged that there is substantial land contamination at the site of the proposed development. Whilst this will undoubtedly be addressed during the construction phase of the proposed development, it must be considered that this presents a risk to the health of local residents during any construction as the contaminants are exposed to and released into the atmosphere.</p> <p><b>11: The proposed development offers no economic benefit to the local area</b></p> <p>The proposed development offers no economic benefit to the village of Theale or the surrounding area. It will not create jobs or bring significant additional economic activity to the village or the businesses therein.</p> <p>In relation to the development at Whitehart Meadow (RSA16):</p> <p><b>1: Flood risk (as-per above objection to RSA17);</b></p> <p><b>2: High voltage lines overhead (as-per above objection to RSA17);</b></p> <p><b>3: Noise and pollution from the motorway (as-per above objection to RSA17);</b></p> <p><b>4: Possible land contamination</b></p> <p>This land is in close proximity to that covered by RSA17 – contamination of this land is a possibility.</p>	

Respondent (with lpr ref)	Response	Council Response				
	<p><b>5: Erosion of the strategic gap between Theale and Calcot/Tilehurst (as-per above objection to RSA17).</b></p> <p>Thank-you for taking the time to read and consider my concerns and objections in relation to this proposed development.</p>					
Cllr Alan Macro (lpr760)	<p>Object to policy.</p> <p>1. Section 4.35 of the Core Strategy contained the following statement: “The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded”. Housing construction on this development has not yet commenced, although the permission has been implemented and Reserved Matters approved. Therefore, that statement is still valid and Theale will still need that “period of consolidation” once construction has been completed.</p> <p>Traffic generated from proposed housing sites RSA16 and RSA17 and employment site EMP6 would greatly exacerbate existing traffic problems in Theale. Traffic data provided by TomTom for the period 1st to 4th April 2019 show the following problems:</p> <table data-bbox="432 1145 896 1276"> <thead> <tr> <th data-bbox="432 1145 604 1177">Morning peak</th> <th data-bbox="734 1145 896 1177">Delay (Secs)</th> </tr> </thead> <tbody> <tr> <td data-bbox="432 1244 571 1276">High St EB</td> <td data-bbox="761 1244 801 1276">78</td> </tr> </tbody> </table>	Morning peak	Delay (Secs)	High St EB	78	<p>Comments noted.</p> <p>The Highways Authority do not object in principle to the development of the sites. Whitehart Meadow should be accessed from the High Street, entailing the removal of the road block facilities. The former sewage treatment works should be accessed from Blossom Lane. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4. Mitigation will be required for the creation of the accesses.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations. Therefore, it is appropriate to allocate further sites in Theale.</p>
Morning peak	Delay (Secs)					
High St EB	78					



Respondent (with lpr ref)	Response	Council Response
	High St WB 82	
	A4 Hoad Way to J12 M4 51	
	J12 EB 60	
	Bradfield Rd EB/Church St 67	
	Bradfield Rd WB/A340 60	
	Common Hill EB 192	
	A340 SB/A4 192	
	Englefield Rd NB/A340 37	
	Evening peak Delay (Secs)	
	High St EB 74	

Respondent (with lpr ref)	Response	Council Response
	High St WB 77	
	A4 Hoad Way to J12 M4 34	
	M4 J12 EB 75	
	Waterside Dr NB 164	
	Waterside Dr SB 81	
	Brunel Rd WB 85	
	Brunel Rd EB 69	
	Common Hill EB/A340 69	
	A4 WB/A340 52	
	Englefield Rd WB/A340 54	
	Englefield Rd EB/Church St 45	

Respondent (with lpr ref)	Response	Council Response
	<p>Please also see sections on RSA16 and RSA17 for additional reasons for rejecting these sites.</p> <p>Changes sought:</p> <ol style="list-style-type: none"> <li>1. Sites RSA16 and RSA17 should be removed from the plan.</li> <li>2. "The Lakeside development has planning permission to provide 350 homes in a range of different sizes and types, which would become a well-integrated part of the Theale community. If this development goes ahead, Theale would need to undergo a period of consolidation to provide an opportunity for facilities and services to be upgraded". Should be added the text following "Non-strategic site allocations".</li> </ol>	
Nataliya Topliss (lpr804)	Support policy	Support for policy noted
Tony Vickers (lpr747)	<p>Object to policy.</p> <p>We feel the change in DEPZs (SP4) may change early in the Plan Period and this will make Grazeley a more suitable strategic site than NE Thatcham (SP 17) as well as unlock several potential and desirable smaller sites in the lower Kennet valley.</p> <p>Traffic generated by SP 17 will have far-reaching impacts on the highway network along the A4 east to J12 of M4 and into Reading, leading to unacceptable congestion on junctions in Theale, adding to traffic congestion from newly allocated sites there. A340 junctions, Hoad Way and Waterside</p>	<p>Comments noted.</p> <p>Though Grazeley was identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Drive will also see tailbacks. We do not believe traffic modelling so far is adequate.</p> <p>Changes sought: SP 17 should be removed from the Plan and modest allocations made instead at larger villages in the settlement hierarchy across the District, to secure their future viability. See also SP 3 comments.</p>	<p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. As an Urban Area, Thatcham should be a focus for development. The HSA DPD allocated Lower Way only, and it is therefore appropriate to allocate further development, particularly in a sustainable and accessible location. Traffic modelling has been undertaken and junction improvements will be required as part of SP17.</p>
<b>Landowners, site promoters and developers</b>		
Charlesgate Homes Ltd (lpr2341)	<p>I am writing to you to see if you able to advise the situation regarding proposed site SUL1 of the draft local plan.</p> <p>I have reviewed the site assessment stuff, and it would appear our site was deemed overall in a positive sense. In March 2020 the Burghfield AWE DPEZ was reviewed and increased by 1.6km from where it was originally, and it would appear that our site being now included in this area has meant the site not currently being put forward as an allocated site at this moment, as the West Berkshire Emergency planners are waiting on a report to come out at some point in January.</p> <p>I am a bit confused as to why 160 houses had been consented within the old 3160m zone (100 of these in outline form at the moment), and yet it is suggested that the WBC emergency planners had suggested that no new multiple housing sites should be proposed if they are within the increased DPEZ zone, but outside of the original 3160m zone?</p> <p>I have sent an email to the emergency planning team, and the ONR to seek if they are applying a blanket ban on new multiple housing sites on basically all of Burghfield common, although I cannot see any thing with the AWE consequences report that suggest that the area needed to be as far out as it</p>	<p>In terms of the situation regarding SUL1, it's essentially as you have summarised – in assessing the site, limited constraints were identified apart from the extension of the AWE Burghfield DEPZ. The starting point for any planning application received within the DEPZ is that permission is likely to be refused on emergency planning grounds. Given this, we have not proposed any sites within the DEPZ for allocation.</p> <p>This doesn't apply retrospectively, as housing developments already identified in the local plan (including the Housing Site Allocations DPD) were identified prior to the zone extending and taken account of by emergency planners. HSA 15 Land adjoining Pondhouse Farm, and HSA16 Land to the rear of The Hollies Nursing Home, were allocated in the HSA DPD. The Local Plan Review is consolidating all previous documents into one so rather than omit these sites from the Local Plan Review, we are proposing to roll-forward the allocations as they have yet to be built out and we want to be able to continue to rely on the policies for applications on the sites.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>has been put, and that all new housing is now forbidden, and I am waiting for a reply to this from WBC emergency planners.</p> <p>I am of course aware that the Grazeley garden village was objected to by the ONR, but at least 60/70% of this proposed 15000 houses sat within the old 3160m zone, but not sure if they have actually objected to the inclusion of SUL1 as a site, as I cannot see anything within any of the site assessments or local plan evidence that WBC emergency planners objected to this site being included within the draft local plan as they never objected to the 100 houses on clay hill road (within the 3160m zone) or the ones on the Reading road (also within the 3160m zone).</p> <p>I know WBC is seeking response via the consultation portal, but I am finding it difficult to respond to this consultation as cannot see any evidence that supported an objection for this site, as there is nothing within the consultation documents for me to respond to.</p> <p>Are you able to advise what this report that is due out in Jan re AWE and emergency planning, and if there has been a formal objection from either WBC emergency planners or The ONR?</p> <p><i>(These queries were responded to directly by the Council on 2nd February 2121 but have been recorded here for completeness. Further queries were then sent in on 8th February 2021 and have been recorded under SP4)</i></p>	<p>We note that you have contacted the emergency planning team about your site. Understandably they have limited capacity to deal with non-Covid issues at the moment. However, our understanding is that some work will be done by them to understand if there is capacity within the DEPZ for a limited number of new dwellings. We understand that this work will be undertaken this year, although we do not know if it will align with the production of the Local Plan Review.</p> <p>We would suggest that you respond to the Local Plan Consultation, outlining the merits of your site. Policy SP14 sets out the sites that are proposed for residential development in the Eastern Area, so comments in relation to sites in that area which have not been proposed could logically go there. All responses, including any received from AWE and emergency planning will be considered as the Local Plan Review progresses.</p>
John Cornwell (lpr1648)	<p>Support policy.</p> <p><b>Submissions on behalf of Messrs I. Cheshire, R. Shaw and The Russell Trust.</b></p> <p>These submissions are made on behalf of the above landowners who own land on the southern part of the adopted housing allocation Ref: HSA16 'Land to the rear of The Hollies Nursing Home and land opposite 44 Lamden Way, Burghfield Common' in the current West Berkshire Housing Site</p>	<p>Comments noted.</p> <p>The allocation is proposed to be removed from the Local Plan Review (LPR) following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Allocations Development Plan Document, adopted May 2017. Phase 1 of this allocation, at the northern end, is currently nearing construction completion by Crest Homes Plc. The above landowners together own the southern Phase 2 part of this allocation for circa 30 or so dwellings.</p> <p><b>Support for the retention of Housing Allocation Ref: RSA19 ‘Land rear of The Hollies Nursing Home and land opposite 44, Lamden Way, Burghfield Common in Proposed Policy SP14 ‘Sites Allocated for Residential Development in Eastern Ares – Sites 1.0 hectares or larger</b></p> <p>The area of land owned by the above landowners has dwelling capacity for 30 or so new dwellings (depending on the final approved layout). The Phase 1 Crest scheme is now nearly complete, with the estate access road in to sub-base level up to the boundary of the Phase 1 and Phase 2 sites.</p> <p>The above landowners are in the final stages of entering into a Development Agreement with T A Fisher Homes of Reading to develop Phase 2. The great majority of technical assessments and surveys for this work have already been carried out, and a significant amount of civil engineering work has been undertaken to devise the most appropriate estate road route through the site, given the levels differences across it.</p> <p>The only outstanding technical requirement is the updating of the Phase 1 Habitats Assessment carried out in 2015 by GreenLink Ecology Ltd. That assessment found evidence of common reptiles which will need translocating before any development takes place. The update can not take place until mid-April to allow for revised bat surveys. It is therefore anticipated that a detailed planning application for this land will be submitted around July 2021.</p> <p>The land is therefore very well placed to commence implementation late 2021, and be completed during 2022.</p>	<p>development had not yet been built out. The site does not have planning permission for residential development.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.</p> <p>The Council's Emergency Planning Team and the AWE object to the development.</p>

Respondent (with lpr ref)	Response	Council Response
TOWN for Pincent's Lane (lpr2130)	<p>Object to policy.</p> <p>Full representation promoting land to East of Pincent's Lane, Tilehurst attached.</p> <p><b>Spatial distribution of housing within the Eastern Area</b></p> <p>The Emerging Draft Local Plan Review notes the Eastern Area is diverse and including both a) a number of urban areas with a close functional relationship with Reading and b) a number of service centres with a rural setting. The characteristics of different parts of that Area are indeed very different. It was for this reason that we proposed that the Council retain the previous spatial approach of defining a separate Eastern Area and East Kennet Valley.</p> <p>Since the Council is not minded to retain its previous spatial approach, we propose that within the Eastern Area, development at an uplifted rate as recommended in these representations should be targeted at those parts of the Area most appropriate for growth – in particular to sites that are free from constraints on the edge of the Reading urban area.</p> <p>It is acknowledged that the presence of safeguarding for AWE establishments, flooding and other constraints means that the identification of suitable sites for development in this area is not straightforward. It also necessitates the efficient use of sites that do come forward for development in order to optimise delivery (within appropriate levels of density, height and so on).</p> <p>The land east of Pincent's Lane should be viewed within this context. Sustainably located close to the Reading urban area and with good public transport accessibility; a landscape-led masterplanning approach has led to the current proposal for 265 units together with an extensive range of community benefits including the provision of a large community parkland; a 450sqm 'healthcare hub' to be offered to the Clinical Commissioning Group</p>	<p>Comments noted.</p> <p><u>Spatial distribution within the Eastern Area:</u></p> <p>The Eastern Area is very constrained, and in Tilehurst the AONB abuts the built up area to the west. The AONB is a nationally valued landscape and growth must be appropriate and sustainable, conserving and enhancing the special landscape qualities.</p> <p>Landscape assessment will therefore be key in determining what can be accommodated without resulting in harm to the AONB and the setting of the AONB.</p> <p>It is not proposed to introduce development at uplifted rates.</p> <p><u>Principle of allocating housing via the Tilehurst Neighbourhood Plan:</u></p> <p>Work has gathered momentum and the consultation on the draft submission version of the plan (Regulation 14) is taking place between 12 September and 24 October 2022.</p> <p>Since the Regulation 18 consultation on the draft emerging LPR, Tilehurst Parish Council have chosen not to include allocations in the neighbourhood plan and it will instead comprise of development management policies.</p> <p>As part of work on the preparation of the proposed submission (Regulation 19) version of the LPR, site selection work will consider sites in Tilehurst to establish if any should be proposed for allocation.</p> <p><u>Changes sought:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>as well as provision for self- and custom-build housing and homes for older people. At the time of writing (with the views of the Council's Highways Officer still awaited), no objections have been raised by the Councils technical consultees and advisers.</p> <p>Under the Council's HELAA process using the blanket 'Pattern Book' approach to density, a development potential of up to 138 dwellings was identified but the HELAA report stated that "...known issues exist which are likely to decrease this number."</p> <p>However, it is now clear that with careful design, appropriate to landscape and other constraints, efficiency of land use can drive up the potential number of dwellings to be achieved in the Eastern Area, and indeed across the District.</p> <p><b>Principle of allocating housing via the Tilehurst Neighbourhood Development Plan</b></p> <p>As promoters of the site to the east of Pincents Lane, we have held a number of discussions with the Tilehurst Neighbourhood Plan Group, most recently in January 2021.</p> <p>We note that the Neighbourhood Plan Area was designated in May 2015. Progress has been slow, with the results of a Parish survey published in September 2020, more than five years later. It is evident that there is a generally strong anti-development stance in the wider community (even if there is considerable support for development of the Pincents Lane site, with c. 200 letters of support for the application having been received by the Council).</p> <p>One way of preventing development from coming forward would be to continue at the present slow pace of production of the Plan. If the Local Plan has effectively delegated decision-making to the Neighbourhood Development Plan then that slow process becomes a de facto</p>	<p>Following the decision of Tilehurst Parish Council to not include residential allocations in the neighbourhood plan, sites in Tilehurst will now be considered further through the Sustainability Appraisal / Strategic Environmental Assessment and site selection work for the proposed submission (Regulation 19) version of the LPR.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>mechanism for halting development in the Parish. We are sure that this would not be the intention of West Berkshire Council as it would risk the delivery of a significant amount of housing proposed for the Eastern Area.</p> <p>At our January 2021 meeting with the Neighbourhood Plan Group, we set out how our proposals for the land east of Pincents Lane fit well with a good number of the objectives of the community expressed in the recent survey. Although there is strong consensus against any development, this is not a realistic stance – in particular given the allocation of a minimum of 175 units proposed in the Emerging Draft Local Plan. It was gratifying to note that, of the sites suggested by residents for development, the Pincents Lane site accounted for 20% of those suggestions – the highest figure.</p> <p>We further note that the January 2021 consultation on revisions to the NPPF sets out the following:</p> <p><i>Paragraph 69 has been amended to remove any suggestion that neighbourhood plans can only allocate small or medium sites. This was not the policy intention, so the wording has therefore been amended to clarify that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) [that is below 1ha in size] suitable for housing in their area.</i></p> <p>In essence therefore, the Government is acting to correct the suggestion that neighbourhood plans should only allocate sites below 1ha in size, encouraging them as well to focus on larger sites such as ours, which are able to provide a wide range of community benefits.</p> <p>One option would be to identify a larger allocation for Tilehurst NP, with the bulk of this allocation to be provided by our site east of Pincents Lane. However, given the strong policy arguments set out earlier in these representations, and the lack of certainty surrounding the progress of the Tilehurst NP, our strong preference remains for a standalone allocation for</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>our site under Policy SP14, as was intended to happen under the Housing Sites Allocation Development Plan Document until late in the process.</p> <p><b>Application of other key aspects of the emerging plan to the site at Pincents Lane</b></p> <p>A key and direct mechanism in delivering an effective District-wide response to climate change will be the allocation of sites in the most sustainable locations, particularly in respect of public transport links to major employment areas. This cross-references to our earlier commentary on the close relationship with the major centre of Reading, with its wide range of services and facilities.</p> <p>In support of our application for the land east of Pincents Lane, we have also submitted proposals to produce a site-specific Climate Change and Resilience Strategy with a commitment to achieve a number of stretched targets in construction.</p> <p>Because of the wide range of community benefits proposed, allocation of the site at Pincents Lane would also help to deliver on the following policies of the Emerging Draft Local Plan Review:</p> <ul style="list-style-type: none"> <li>• SP10, Green Infrastructure</li> <li>• SP22, Transport</li> <li>• SP23, Infrastructure requirements and delivery</li> <li>• DC2, Health and wellbeing</li> <li>• DC14, Trees, woodland and hedgerows</li> <li>• DC17, Self and custom build</li> <li>• DC18, Specialist housing</li> <li>• DC35, Transport infrastructure</li> <li>• DC37, Public open space</li> <li>• DC39, Local shops, farm shops and community facilities</li> </ul>	

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>It is also in accordance with the remaining strategic and development management policies of the Emerging Draft plan.</p> <p>In conclusion, on behalf of the promoter of the site east of Pincents Lane, we object to the Emerging Draft Local Plan Review on the grounds that:</p> <ul style="list-style-type: none"> <li>• Insufficient provision is made for housing supply for local needs under the plan;</li> <li>• Provision should be made for unmet needs likely to arise from Reading Borough;</li> <li>• Over-reliance is made on housing to be delivered from large strategic sites;</li> <li>• The spatial distribution across the District is overly focused on Newbury and Thatcham to the detriment of areas in more sustainable locations closer to Reading;</li> <li>• The spatial distribution within the Eastern Area underplays the importance of sustainable functional relationships with Reading, including its services, facilities and non-car modes of access; and</li> <li>• That the land east of Pincents Lane should be allocated for a site of up to 265 units (40% affordable) under policy SP14, alongside a commitment to deliver a substantial area of new local public open space.</li> </ul> <p>Changes sought:</p> <p>The land east of Pincents Lane should be allocated under this policy as a Large Site with an allocated figure of 265 units in line with the extant planning application. Consequently, the allocation for the Tilehurst NP under SP14 could be reduced and apply largely to brownfield and other redevelopment sites in the Parish.</p>	

Respondent (with lpr ref)	Response	Council Response
West Build Homes (lpr2137)	<p>Westbuild broadly support the Council’s approach to the delivery of housing set out within Policy SP12, but have some reservations about specific matters which are set out below.</p> <p>Significant concern exists, however, about the Council’s over-reliance on two large strategic sites. The Council’s own experience, and that on a national level, is that strategic sites have lengthy lead-in times, and are inherently slow in delivery, and this should be reflected within the emerging plan review through the inclusion of criteria for sites not proposed for allocation to be considered, increasing the flexibility afforded to the Council and reducing the reliance upon strategic sites.</p> <p>Paragraph 6.10 of the draft emerging plan refers to paragraph 68 the National Planning Policy Framework (The Framework) and the weight that should be attributed to the benefits of using suitable sites within existing settlements for homes. What it fails to have any regard to, however, is the sub section <b>Paragraph 68(d)</b> which states that local planning authorities should:</p> <p><i>“work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”</i></p> <p>Westbuild contends that without reference to the part of the Framework, and the inclusion of such provisions within the proposed policies, the plan is flawed in its approach and does not fully meet the tests of soundness.</p> <p>Changes sought: Policies SP13 -15 should be amended to provide the potential for additional sites to come forward within the plan period and to ensure that any delays to the delivery of the large strategic sites is mitigated.</p>	<p>The Council’s strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites (including brownfield sites within settlement boundaries) that can deliver housing sooner.</p>
Hallam Land Management (lpr2337)	<p><i>Full representation promoting the allocation of Land at Kiln Lane, Mortimer is attached.</i></p>	<p>There are a significant number of constraints within the Eastern Area, meaning that provision for new development is more limited.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Policy SP 14 highlights that of the 12 sites proposed for allocation in the Eastern Area in the emerging Local Plan, 9 are existing allocations which have not yet come forward. In short therefore there are only 3 new allocations in the Eastern Area. Policies SP 13 and 15 reflect similar trends.</p> <p>This does not demonstrate the ‘positive’ and ‘aspirational’ approach advocated in the NPPF or respond to the social and economic relationship this area has with Reading as described above, and which itself justifies the <b>need to provide additional allocations to ensure the Plan allocates a balanced and sustainable portfolio of sites which will be delivered in a timely manner and to ensure that a continuous and flexible supply of land is available throughout the Plan period.</b></p> <p>It is also important to note that the two sites which are carried forward in Burghfield Common now fall within the amended AWE consultation zone and as such are no longer suitable for housing.</p> <p>In terms of additional allocations, we urge the Authority to consider the land promoted by Hallam to the west of Mortimer which would provide a suitable location to deliver up to 110 dwellings over the Plan period.</p> <p>The land controlled by Hallam was assessed through the Housing and Economic Land Availability Assessment (December 2020) (HELAA). The outcome of this assessment concluded that the site (ref: SM7) was not developable within the next 15 years. We disagree with this conclusion which is drawn from a conclusion that “development would not be appropriate in the context of the existing form, pattern and character of the landscape” This conclusion is not supported by any evidence and is not robust. The HELAA assessment itself shows that the Site has no constraints in respects to flooding, ecology, heritage or access. The site is adjacent to the settlement boundary and as demonstrated in our March 2020 Technical Note, development can be assimilated into the settlement character, form and landscape. Conversely the site was assessed (ref: MOR001) as having potential in the Strategic Housing Land Availability Assessment (2013).</p>	<p>The LPR will not include allocations in Stratfield Mortimer. The adopted Stratfield Mortimer NDP includes an allocation for up to 110 dwellings. The allocated site has outline planning permission, and there is Reserved Matters permission for two parts of the site (it is coming forward in phases).</p> <p>The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Given the outstanding dwellings still to deliver, it is considered that there should be not any additional allocations in the plan period. It is however recognised that windfall development may come forward over the plan period.</p> <p>Within the HELAA, the site SM7 (Land off Kiln Lane, Mortimer) has been assessed as ‘not developable within the next 15 years’, and this in light of the recommendations of a 2017 Landscape Capacity Assessment (LCA, in which the site had the reference MOR001) which were:</p> <p><i>None of this site would be suitable for housing. Despite the fact that the existing development in The Avenue to the west extends down the hillside to a similar extent, this is not a suitable model for future development if the distinctive character of the settlement pattern and the valued attributes of the open rural landscape character are to be conserved. The only part of the site that relates well in any way to the settlement pattern is the most north-westerly corner above 90m AOD but to develop this would adversely affect the area of pasture, a valued feature of this landscape. The northern parcel is better contained,</i></p>

Respondent (with lpr ref)	Response	Council Response
	<p>There have been no significant changes subsequently to justify a different conclusion.</p> <p>On reviewing the other potential sites within Mortimer (SM1 – SM7) it is considered this site (ref: SM7) would be the most suitable site to allocate for future development. From this review it is noted that sites SM1, SM4, SM6 are subject to overriding constraints including flood risk, areas of Local Green Space and Tree Protection Orders. SM3 is already allocated in the NDP. SM2 could have potential for development although the site has capacity for only 47 dwellings and is subject to uncertainty regarding its ecological value and SM5 is remote from the centre of the settlement and if allocated would deliver a less sustainable development than SM7.</p> <p>SM7 is approximately 480m walking distance from the centre of the settlement, which is identified in the NDP as St John's Church, whereas SM2 is approximately 700m from the centre and SM5 is approximately 1.15km from the centre. Demonstrating that SM7 is the most sustainably located site, with the ability to deliver a meaningful number of houses over the plan period following the delivery of SM3.</p> <p>Changes sought:</p> <p>Recommended that West Berkshire Council reconsider the Policies for the Eastern Area, and include further allocations including Land at Kiln Lane, Mortimer.</p>	<p><i>both visually and physically, but this does not outweigh the harm to the landscape character and views from the adjoining rural footpaths.</i></p>
Savills for Englefield Estate Office (lpr1531)	<p>The approach of draft LPR Policy SP14 to carry forward for allocation the Estate's land at The Green, Theale (ref. HSA14, now RSA15) and at Pondhouse Farm, Burghfield Common (ref. HSA15, now RSA18) is supported. As you will be aware, outline planning permission was granted for up to 104 homes at The Green, Theale in December 2020 (WBC ref.</p>	<p>Comments noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>19/01172/OUTMAJ), in line with Policy HSA14. Similarly, outline planning permission was granted for up to 100 homes at Pondhouse Farm, Burghfield Common in December 2019 (WBC ref. 18/02485/OUTMAJ), in line with Policy HSA15. Reserved matters applications will be submitted for both sites in due course prior to development on site. As the HSA DPD and Core Strategy will be replaced by the LPR Emerging Draft on adoption, the approach to carry forward these two site allocations will help to inform the forthcoming reserved matters applications and is therefore supported.</p> <p>As explained above, draft LPR Policy SP14 should make provision for future housing supply at Burghfield through the NDP and also make additional provision for housing at Mortimer to cover the LPR plan period to 2037.</p>	
Barton Willmore for Wilson Enterprise Ltd & Hallam Land Management (lpr2410)	<p><b>Grazeley: The Opportunity</b></p> <p>The area promoted as the Grazeley Garden Town was identified as one of the main development opportunity areas in The West of Berkshire Spatial Planning Framework (December 2016) and subsequently supported by Homes England funding and more recent joint studies such as the Wokingham Strategic Growth Locations report, June 2018. The strategic site, most of which lies in Wokingham brings opportunities to deliver housing in both Wokingham Borough (around 10,000) and West Berkshire (around 5,000) if the Council still wanted to promote future housing on its land. Clearly Grazeley can proceed without the West Berkshire land, but the Council will still need to consider and plan for cross boundary implications and mitigation.</p> <p>The site is relatively unconstrained in environmental terms. It is not within the Green Belt and does not have any areas of high-quality agricultural quality.</p>	<p>Though Grazeley was identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation. The site is therefore no longer suitable.</p> <p>The High Court challenge has not resulted in any amendments to the boundaries of the DEPZ for AWE Aldermaston and Burghfield.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It is well located between two significant transport corridors: the A33 trunk road (with access to junction 11 of the M4) and the Reading to Basingstoke railway line. It is well related to existing employment opportunities in central Reading, Green Park, and the wider Thames Valley. Grazeley therefore clearly has exceptional connectivity and offers the opportunity to provide sustainable transport links to the M4/A33, to the Reading-Basingstoke/Paddington and Waterloo main lines as well as to national cycle routes and can offer many pedestrian and cycle routes to key employment areas, such as central Reading, Green Park, and the wider Thames Valley.</p> <p>The new community would also be situated in an area of high labour supply need, accessibility, housing need and poor affordability. A new settlement at Grazeley offers the opportunity to:</p> <ul style="list-style-type: none"> <li>• Deliver a range of types and tenures of homes in a sustainable location that will support the economic growth of the sub-region.</li> <li>• Offer genuine sustainable travel</li> <li>• Provide a mix of uses and a sustainable form of</li> <li>• Provide jobs to support economic growth, targeted to the sectors projected to grow in the sub-region.</li> <li>• Deliver much needed affordable housing that will help address the affordability</li> <li>• Provide additional local expenditure and GVA growth to support the</li> </ul> <p>In addition, if properly planned and designed, this new community will represent a new Garden Community of the highest quality offering those who live, work, and visit a thriving, interesting, exciting place, providing the best of both town and country in a convenient and well-connected location.</p> <p>In accordance with national planning policy, the proposals at Grazeley therefore offer a sub-regional opportunity to create a high quality self-contained new settlement in an ideal location that will optimise sustainability</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>and support the local economy, whilst benefitting from excellent connectivity to the wider region.</p> <p>Within its boundary, Grazeley offers a unique opportunity to provide a new settlement which could bring many benefits to Wokingham and the wider area, which could include:</p> <ul style="list-style-type: none"> <li>• A high-quality series of neighbourhoods set in a network of open</li> <li>• A variety of different types and tenures of homes which will contribute to Wokingham's and West Berkshire's housing land supply whilst creating a balanced and sustainable community, from self-build to retired living, including all types of affordable housing (shared ownership, social rented, affordable rented, starter homes, discounted market sales, rent to buy, key worker) to provide an inclusive and balanced</li> <li>• 7 primary schools and 2 secondary schools to provide for its</li> <li>• A range of employment spaces to nurture new ventures as well as providing bespoke space for companies supporting the economic growth of the Thames Valley.</li> <li>• A 'campus' which provides a setting for potential hubs for knowledge, health, science and the 'Art of Making'.</li> <li>• Generous opportunities for walking and cycling with easy access to open space to enhance the wellbeing of resident's and enhance</li> <li>• Local and strategic SANG for residents and visitors to optimise the opportunity of The AWE Burghfield Detailed Emergency Planning</li> <li>• A number of significant infrastructure improvements: <ul style="list-style-type: none"> <li>○ A bridge over the M4 to connect Green Park to Grazeley, providing pedestrian, cycle and public transport links to Green Park Station and employment</li> <li>○ New access, junctions, roads, extension to the existing park and ride and a new park and ride</li> <li>○ Improvements to Junction 11 of the</li> <li>○ A potential new rail</li> </ul> </li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>○ Major water and utility infrastructure</li> </ul> <p><b>The DEPZ</b></p> <p>It is recognised that there is some uncertainty regarding the current DEPZ at this point in time. The publication of this draft local plan just before the High Court challenge hearings has not been able to benefit from the judgement on that case (which is still awaited, at the time of writing). As development of a new settlement at Grazeley can still be planned and designed within the ONR demographic siting criteria, irrespective of the High Court decision, this current uncertainty should not prevent the Council properly planning for its area in the longer term, preparing its evidence base and taking into account a new settlement on its boundary within Wokingham Borough in this local plan.</p>	
Carter Jonas for Mrs and Mr Wickens (lpr2277)	<p>Mrs J Wickens &amp; Mr A Wickens generally agree with the proposed vision for the Local Plan. However, the vast majority of allocations and dwellings are allocated in Newbury and Thatcham. However, there is a need to balance the requirements to deliver a range of housing and opportunities across the district, which this plan overlooks. It is suggested therefore, that through the development of the plan a more locational vision is considered with a wider range of sites and locations coming forward to meet the housing needs for West Berkshire</p> <p>The NPPF sets out that Local Plans should be aspirational but realistic and that housing sites should either be deliverable or developable. The glossary to the NPPF states that to be deliverable sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on site in 5 years and is</p> <p>The PPG notes on Local Plans set out that policies in a Local Plan should recognise the diverse types of housing needed in their area and where</p>	<p>Though Grazeley was identified as a possible location for a new garden settlement, changes to legislation (Radiation (Emergency Preparedness and Public Information) Regulations 2019) have resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield. The Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield now covers the area of Grazeley. The change resulted in objections to the Grazeley garden town proposal from the Defence Nuclear Organisation (part of the Ministry of Defence) and the Office for Nuclear Regulation. The site is therefore no longer suitable.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>appropriate identify specific sites for all types of housing to meet anticipated housing</p> <p>The project at Grazeley provides a unique opportunity in West Berkshire (and Wokingham) for a comprehensively planned new settlement. This settlement is backed by both Homes England and a successful Housing Infrastructure Fund bid. The new settlement will be planned and delivered with a comprehensive package of infrastructure, and services and facilities. This will support significant housing delivery that will not only help West Berkshire to meet future housing needs, but it could also play a role in helping the neighbouring authorities of Reading and Wokingham meet their needs – and unmet needs which could</p> <p>Mrs J Wickens &amp; Mr A Wickens confirm that their land is available now, and can be developed during the plan period, but it is also accepted that it is part of the wider Grazeley project. Pierce’s Farm could come forward once access has been established from the A33, and as such could be allocated for development.</p> <p>It is further noted that at present, there are limited options that will preclude development for the land at Grazeley and so it would be unlikely that any proposals would preclude the delivery of the new settlement project. However, for the Council to demonstrate that it is committed to this exciting and sustainable project, Mrs J Wickens &amp; Mr A Wickens suggest that if the Council does not consider allocation to be appropriate at this time, the land in West Berkshire’s boundary for Grazeley is ‘reserved’ or ‘safeguarded’ for its future development</p> <p>Explicitly identifying the land for Grazeley in the Local Plan would help the Council to clearly articulate how it is discharging its obligations towards the Duty to Cooperate with neighbouring authorities. Moreover, it would give some certainty to the community that change should be expected in the area. The deliverability of the site in the plan period, need not be demonstrated at this stage, in order to identify the land in the Plan and on</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>the Policies Map because it could rightly be recorded as an area for growth, which is not making a (significant) contribution to the housing needs of the area up to This would allow for monitoring of the site through the Authority Monitoring Report and should the delivery of homes be needed to support the five year land supply – ways to accelerate delivery at Grazeley could be explored.</p> <p>Conclusion: Mrs J Wickens &amp; Mr A Wickens are pleased to have had the opportunity to comment on this early stage of West Berkshire Council’s Local Plan review. The general provisions of the vision and strategy a broadly supported, and further detail is awaited with interest. In the meantime, Mrs J Wickens &amp; Mr A Wickens confirm that their land is available and suitable for development and this could be achieved at any point during the plan period.</p> <p>Mrs J Wickens &amp; Mr A Wickens look forward to further and continued dialogue with the Council (and other key stakeholders as appropriate) regarding development options on their land associated with wider growth options at Grazeley</p> <p>Changes sought:</p> <p>Mrs J Wickens &amp; Mr A Wickens recommend the inclusion of Pierce’s Farm as an allocation or ‘reservation’ for development. Under draft Policy SP14, the Council confirms that Grazeley has been identified as a possible location for a new garden settlement stating “<i>Grazeley has been identified as a possible location for a new garden settlement, there are uncertainties regarding the proximity to AWE Burhangghfield, funding for infrastructure and delivery timescales</i>” (paragraph 22).</p> <p>As of March this year, West Berkshire took a delegated decision to enact a revised Detailed Emergency Planning Zone in relation to AWE Burghfield. This has effectively doubled in extent and now covers all of the proposed</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Grazeley allocation, parts of south Reading including Green Park and the Madejski stadium as well as 15,000 residents (previously it was around 500).</p> <p>This decision is subject to legal challenge as it is believed the Council has acted unlawfully in establishing a revised DEPZ without any further consideration of the appropriateness of the minimum area for Urgent Protection Actions because of a lack of any adequate enquiry into the necessity for the substantially increased</p> <p>Given that the Grazeley has previously been included identified as an area suitable for substantial growth through the construction of a garden town, Pierce's Farm should be included as an allocation or 'reservation' for development. This is particularly pertinent given the legal challenge facing the AWE Detailed Emergency Planning Zone.</p>	
Pro Vision for TA Fisher (lpr2028)	<p>Object to policy.</p> <p><i>Full representations attached</i></p> <p>Our client has an option on the land at West End Road, Mortimer (HELAA ref. SM2; SHLAA ref. MOR005) and is promoting this land for development with the consent of the landowner, Englefield Estate.</p> <p>Our client's land has not been allocated for development in the draft Local Plan. This is due to Policy SP14 of the draft Local Plan not allocating additional housing to the village beyond that already accommodated in the current Stratfield Mortimer Neighbourhood Development Plan (NDP) (June 2017), which extends until 2026.</p> <p>These representations therefore respond to Policy SP14 regarding the absence of a housing allocation to Stratfield Mortimer beyond 2026. We consider that it is necessary for the Local Plan Review to allocate additional</p>	<p>The LPR will not include allocations in Stratfield Mortimer. The adopted Stratfield Mortimer NDP includes an allocation for up to 110 dwellings. The allocated site has outline planning permission, and there is Reserved Matters permission for two parts of the site (it is coming forward in phases).</p> <p>The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Given the outstanding dwellings still to deliver, it is considered that there should be not any additional allocations in the plan period. It is however recognised that windfall development may come forward over the plan period.</p> <p>It is the intention of Stratfield Mortimer Parish Council to undertake a full review of the Neighbourhood Development Plan.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>housing to the village, which can be accommodated through a NDP Review, up to the end of the Plan-period in 2037.</p> <p>In this regard, the land owned by our client at West End Road, Mortimer, is suitable, available and achievable for housing development, as well as being deliverable in full within the next five years. It is well located to assist with meeting the village's housing needs.</p> <p>The site offers the potential for a sustainable and logical residential development of approximately 47 dwellings, alongside associated development, in line with the Council's strategy for growth and settlement hierarchy. The Site Promotion Document provided in Appendix A of these representations is re-submitted in support of the development opportunity.</p> <p>We consider our client better placed than most to bring forward development in Mortimer given their existing and established working relationship with the Parish and community. Our client wishes to work collaboratively with the District and Parish Council with the aim of securing the sustainable development of the site – through the NDP process – following an allocation of additional housing to the village within the Local Plan Review. These representations therefore respond to the draft Local Plan and its evidence base with reference to the need to allocate additional housing to Stratfield Mortimer, alongside the wider matters identified within the Document, building upon the information previously submitted.</p> <p>In summary, our main comments in relation to the draft Local Plan are as follows:</p> <ul style="list-style-type: none"> <li>• The need to recognise the role that Stratfield Mortimer can play beyond 2026, given that it is identified as a Rural Service Village that is suitable for growth in line with the Council's spatial strategy and settlement hierarchy.</li> <li>• The need to allocate additional housing to Stratfield Mortimer beyond that already accommodated in the current Stratfield Mortimer NDP, which extends until 2026. This can be accommodated through a NDP Review, up to the end of the Plan-period in 2037.</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• The need for the Council to engage with Stratfield Mortimer Parish Council regarding its aspirations for the future of the village.</li> <li>• The need to review the level of housing that the Council is looking to accommodate to ensure that it assists with addressing the pressing need for affordable housing in the District, as well as the additional economic, social and environmental benefits associated with a higher level of growth, alongside the potential need to assist neighbouring authorities with meeting any of their unmet housing needs.</li> <li>• The need for additional housing allocations to ensure that planning decisions remain Plan-led throughout the whole Plan-period, there is sufficient flexibility in the Council's housing supply and the Plan is deliverable.</li> <li>• Confirmation that land owned by our client at West End Road, Mortimer is suitable, available and achievable for housing development, as well as being deliverable in full within the next five years.</li> <li>• Compliance with national planning policy and guidance.</li> </ul>	
Pegasus Planning for Calcot Park Golf Club (lpr2328)	<p>Object to policy.</p> <p>The policy lists a number of sites of varying sizes, which are proposed to be allocated for residential development. It is considered that some of these sites are not ideally suited or justified and they should be removed from the list. In particular, the following:</p> <ol style="list-style-type: none"> <li>1. RSA 16 – Whitehart Meadow, Theale (Site Ref THE1)</li> <li>2. RSA 17 – Former Theale Sewage Treatment Works, Theale (Site Ref THE7)</li> </ol> <p>All of these sites are small and currently in use as open fields. Although they each adjoin the edge of a settlement, they offer very limited opportunities for landscaping, as well as biodiversity and geodiversity net gain. The plans in the local plan show they have issues with flooding, motorway noise or they are 95% covered in new development with a narrow "landscaped buffer" on</p>	<p>Comments noted.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>Allocations in Tilehurst had been proposed to be included within the neighbourhood plan that is being prepared by Tilehurst Parish Council and which will cover the whole of Tilehurst Parish. It is for this reason that the draft emerging</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the site edges. These sites are less suitable for allocation and they are poor choices for new housing to help meet the local need in the next few years than that proposed at Calcot Park Golf Club (CPGC).</p> <p>In contrast, the 6.2 hectares of land at CPGC, is gently sloping with limited long distant views. It is heavily screened and fully enclosed by existing woodland and there are considerable opportunities available to provide a landscape-led scheme that will enhance and improve the visual amenity of the local area and at least 10% bio and geodiversity net gain. Use of land owned by the golf club to enhance the natural environment within a sustainable location, as part of a modest development of up to 70 dwellings, which may include up to 28 (40%) affordable units, will lead to considerable improvements to the amenities, wellness and mental health of both existing, and future, local residents.</p> <p>In its current form, it is therefore considered that Policy SP14 has not allocated sufficient sites to help meet the District-wide shortfall of 1,661 dwellings identified in the Local Plan. The allocations identified are also considered to be sequentially inferior to that at CPGC, whilst providing less quantifiable benefit in terms of meeting other policy aspirations of the Local Plan relating to support for the rural economy (in this regard, please see our additional comments against Policy DC32, below).</p> <p><i>Policy SP14 – Sites allocated for residential and mixed-use development in Eastern Areas is Objected to, because a number of the proposed allocations are not suitable and land at CPGC needs to be included in the list of larger sites (1ha or larger) for the allocation of up to dwellings.</i></p> <p>Changes sought:</p> <p><b>Policy RSA 16 – Whitehart Meadow, Theale (Site Ref: THE 1)</b></p> <p>This policy states that this site should be allocated in the local plan for approximately 100 dwellings. The plan shows only a red line around the site.</p>	<p>Local Plan Review (LPR) did not propose any allocations in Tilehurst.</p> <p>Since the consultation on the emerging draft LPR, Tilehurst Parish Council has decided not to include any allocations within the neighbourhood plan, and it will instead comprise of development management policies. A part of the work on proposed submission (Regulation 19) version of the LPR, sites in Tilehurst will now be considered for allocation through SA/SEA and more detailed site selection work.</p> <p>Policy SP12 of the emerging draft LPR made provision for 8,840 to 9,588 net additional dwellings (520 to 575 dwellings per annum. The target figure was 564 dwellings. The supporting text to policy SP12 identified a supply of 11,439 dwellings over the plan period.</p> <p>It is not proposed to remove the allocations at Whitehart Meadow and at the former Theale Sewage Treatment Works. Technical evidence supports the allocations, and the comments received through the consultation to each site can be found under the Council responses to RSA16 and RSA17.</p> <p>Land at Calcot Park Golf Course has been assessed as 'potentially developable in part' in the update of the Housing and Economic Land Availability Assessment (HELAA), and the site has the reference TIL19. The HELAA assessment of the site recognises that the site is located within the settlement boundary whereby there is a presumption in favour of development. However, the site is covered by a blanket Tree Preservation Order (TPOs). Trees cover much of the site, apart from the south western area of the site.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>No “landscape buffers” are indicated on the boundaries of the site. Without any details on the plan, it must be assumed that these boundary treatments will be narrow and/or weak in their likely effectiveness. Such unsubstantial boundary treatments will not provide the 10% bio and geodiversity net gain required by policy SP11. Also, they will not provide the level of landscape and visual impact mitigation that is required by policy SP10. Boundary screening will be especially important in this location, which is low-lying land to the north of Theale and will therefore be visible in several long-distance views. In addition, the area is known to be very low-lying and liable to flooding, given proximity to the Sulham Brook, as well as being close to the M4, which will create problems of noise and air quality.</p> <p>The site, which has been previously refused by the Council in 2017 on grounds of being located within the countryside and flood risk, ref: 16/03613/OUTMAJ, provided a landscape strategy, but it is considered that in the form as previously submitted the scheme would not effectively overcome issues relating to proximity to the M4 nor would it adequately mitigate flooding and drainage concerns.</p> <p><i>Policy RSA 16 – Whitehart Meadow, Theale (Site Ref: THE 1) should be removed from the local plan, because the site is not suitable for residential development.</i></p> <p><b>Policy RSA17 – Former Sewage Treatment Works, Theale (Site Ref: THE7)</b></p> <p>This policy states that this site should be allocated in the local plan for 70 dwellings. The plan shows only a red line around the site. No “landscape buffers” are shown on the plan, so it must be assumed that these boundary treatments will be weak and ineffective. Such unsubstantial boundary treatments will not provide the 10% bio and geodiversity net gain required by policy SP11. Also, they will not provide the level of landscape and visual impact mitigation that is required by policy SP10. Boundary screening will be especially important in this location, which is low-lying land to the north of</p>	<p>The LPR is not proposing the allocation of sites that are located within the settlement boundary. This is because settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Theale, which will be visible in several long-distance views. A large part of the site will be sterilised by high voltage cables running across it. In addition, the area is known to be very low-lying and liable to flooding, as well as being close to the M4, which will create problems of noise and air quality.</p> <p>An application for development of 88 dwellings was made in 2017, ref: 16/02850/OUTMAJ, but was withdrawn further to objection from Highways Officers in respect of substandard road access and width, as well as concerns raised in respect of landscape and visual impact. It is considered that on the basis of the quantum of dwellings still proposed, it is unlikely that a technical solution can be found that would deliver development as envisaged.</p> <p><i>Policy RSA 17 – Former Sewage Works, Theale (Site Ref: THE7) in its current form should be removed from the local plan, because the site is not suitable for residential development. Alternatively, the proposed allocation should be reduced in quantum to a level that can be technically accommodated taking into consideration known site access and landscape matters</i></p> <p>Should the LPA consider the representations made in support of allocation of the land at CPGC for residential development to have merit, CPGC respectfully suggest the following policy wording:</p> <p><b>Proposed Policy RSA XXX – Land at Calcot Park Golf Course, Calcot</b></p> <p><i>This 6 hectare site lies within the north eastern perimeter of Calcot Park Golf Club, adjacent to the residential area of Churchend. The site will deliver high quality, sustainable development that will:</i></p> <ol style="list-style-type: none"> <li>1. a) Provide for up to 70 dwellings at a mass and density that reflects the character of the adjoining settlement;</li> <li>2. b) Respond positively to the special characteristics and sensitivities of the landscape to minimise any visual impacts;</li> </ol>	

Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>3. <i>c) Respond positively to the surrounding heritage assets, particularly Grade II* Listed Building Calcot Court, to avoid harm to the significance of the Listed Building and its setting;</i></li> <li>4. <i>d) Provide significant Green Infrastructure improvements in line with the council's Local Plan policy SP10;</i></li> <li>5. <i>e) Avoid or mitigate adverse impacts on key species and habitats whilst ensuring at least 10% bio and geodiversity net gain;</i></li> <li>6. <i>f) Ensure adequate infrastructure is provided for sewage and surface water drainage;</i></li> <li>7. <i>g) Ensure appropriate measures are put in place to mitigate impacts on the highway network;</i></li> <li>8. <i>h) Improve the long-term viability of the golf course through the production of a section 106 agreement to require that capital released by the development is spent on the redevelopment of the Calcot Park Golf Club clubhouse and other improvements to the Golf Course.</i></li> <li>9. <i>i) A Viability Report will be required to identify the level of affordable housing capable of being supported by the enabling residential development</i></li> </ol>	
Gerald Eve LLP for Fairhurst Estate (lpr2372)	<p>Object to policy.</p> <p>Our client owns and controls land situated to the East of Shaw Farm Road, Newbury. A site location plan of this land is included at Annex 1 (<i>attached</i>). The land would be accessed from the roundabout adjacent to the Vodafone Headquarters as an extension to the already permitted housing development, and would not rely upon vehicular access from Shaw Farm Road/Love Lane itself.</p> <p>We share the concerns of others in respect of the approach to the identification and allocation of sites for development. In particular the heavy reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandford Park and</p>	<p>The site 'East of Shaw Farm Road, Newbury' has been assessed as 'potentially developable in part' in the update of the Housing and Economic Land Availability Assessment (HELAA), and the site has the reference SCD8.</p> <p>There are constraints which mean the site is unlikely to be suitable within the next 15 years, namely that there is no suitable access to the site, and the Council's Highways Team have advised that they would not support this development as it is reliant on other sites that often leads to ransom situations and roads not be adopted under the Section 38 process.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>evidenced through background papers such as the 'Start to Finish' Report prepared by Lichfields).</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner.</p> <p>The Council's own assessment (within the HELAA (December 2020) of the wider area, within which the land is situated, stated that it is well related to Newbury and that it should be considered as part of a future potential strategic site (site reference SCD4). The Council has accepted the principle that the general location is suitable for development and, in positively preparing the plan, should be considering the positive contribution that a flexible approach to additional housing in locations such as this can make to ensuring that the plan meets its objectives. This would align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Changes sought:</p> <p>Further consideration of the whole site assessed as SCD4 within the HELAA should be undertaken. The site, as shown within SCD4, and specifically including the area as identified on the enclosed plan, merits further investigation and consideration for inclusion as a suitable site for the delivery of additional new homes.</p>	
Turley for Richborough Estates Ltd. (lpr2390)	<p><i>Full Representation promoting allocation of land north of Silchester Road, Tadley is attached.</i></p> <p>Richborough Estates Ltd are promoting the site Land North of Silchester Road, Tadley as an allocation for residential development. Therefore we request the site be included in Policy</p>	<p>The site 'Land north of Silchester Road, Tadley' has been assessed as 'potentially developable in part' in the 2022 update of the Housing and Economic Land Availability Assessment (HELAA), and the site has the reference ALD9.</p> <p>There are constraints which mean the site is unlikely to be suitable within the next 15 years, namely that the site is</p>

Respondent (with lpr ref)	Response	Council Response
	<p>SP14 as a Larger Site allocation, which can provide approximately 400 dwellings.</p> <p>As highlighted in the letter above, the site is within a highly sustainable location with limited environmental and historic site constraints. The site is also available for development.</p> <p>It is noted that no strategic allocations have been made within the Eastern Area. Therefore, allocating the site Land North of Silchester Road, Tadley for residential development within the Local Plan would contribute towards meeting the housing numbers in this area and the wider District. It may also be able to contribute to the Needs of Basingstoke and Deane Borough Council.</p> <p>Work undertaken so far has not highlighted any technical reasons that would prevent the site coming forward. It is also considered that the site can viably deliver policy-compliant levels of affordable housing and other policy requirements of the current and emerging Local Plans.</p>	<p>located within the AWE Aldermaston DEPZ, and residential development which increases the population density of the area is likely to compromise the effectiveness of the emergency evacuation procedures in the event of an incident at the AWE.</p>
Barton Willmore for Sulham Estate (lpr2441)	<p>Object to policy.</p> <p>We do not agree with the Council's approach on the basis that no additional sites within Tilehurst are allocated.</p> <p>We note that the Local Plan Review does not include any additional site allocations at Tilehurst. The only additional site allocations within the Eastern Urban Area in the Regulation 18 draft are at Theale and Woolhampton. Noting "the close functional relationship" between the urban area of Tilehurst and Reading (as stated at paragraph 4.11 of the draft plan), the development of Hall Place Farm represents a highly appropriate location to contribute to meeting the significant unmet needs of Reading Borough Council (please refer to our comments in relation to SP12 and the Housing Need Technical Note which accompanies these representations). Further, there is a particular need for family housing with gardens in Reading due to</p>	<p>The Eastern Area is very constrained, and in Tilehurst the AONB abuts the built up area to the west. The AONB is a nationally valued landscape and growth must be appropriate and sustainable, conserving and enhancing the special landscape qualities.</p> <p>Landscape assessment will therefore be key in determining what can be accommodated without resulting in harm to the AONB and the setting of the AONB.</p> <p>Allocations in Tilehurst had been proposed to be included within the neighbourhood plan that is being prepared by Tilehurst Parish Council and which will cover the whole of Tilehurst Parish. It is for this reason that the draft emerging Local Plan Review (LPR) did not propose any allocations in Tilehurst.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the vast majority of housing allocations within Reading to be delivered as high-density flatted schemes. The absence of further allocations in Tilehurst within the draft plan and consequential lack of geographical spread of sites across the Eastern Urban Area misses an important opportunity to support the growth of Reading.</p> <p>The most sustainable areas within this location should be allocated for development. Hall Place Farm on the edge of Tilehurst represents an appropriate location for growth on a site which is deliverable within the short term. The site is well-related to existing infrastructure and services including public transport and schools. Please refer to the Vision Document submitted with these representations for further details.</p> <p>Land at Hall Place Farm (TIL18) was ruled out through the site selection process on the basis that “development would be inappropriate in the context of the existing settlement form, pattern and character of the landscape”.</p> <p>This is an incorrect assessment of the site and relationship to the settlement/wider landscape. As set out in the accompanying Landscape and Visual Appraisal for Land at Hall Place Farm, the Site not only immediately adjoins the existing western settlement boundary of Reading, but is physically and visually separated from the wider open countryside to the north-west and west of the Site. This is by the combination of the existing topography and the containment provided by the substantial woodland and vegetation to the west of the Site, such that the Site is orientated to and well related to the existing settlement of Reading, rather than to that the open or wider countryside.</p> <p>Furthermore, as a consequence of the above, the Site is physically, visually and functionally related to the existing residential area of Tilehurst on the western edge of the settlement of Reading. Set within the existing residential development to the north and south the Site, provides the opportunity for the</p>	<p>Since the consultation on the emerging draft LPR, Tilehurst Parish Council has decided not to include any allocations within the neighbourhood plan, and it will instead comprise of development management policies. A part of the work on proposed submission (Regulation 19) version of the LPR, sites in Tilehurst will now be considered for allocation through SA/SEA and more detailed site selection work.</p> <p>The site ‘Land at Halls Place Farm, Tilehurst’ was assessed as not developable within the next 15 years in the HELAA. The site is enclosed by Clay Copse to the north and west, and whilst part of the site comprises of hardstanding, the AONB Board and Natural England have identified that development has the potential to create harm to the AONB. Little Heath Road forms a boundary to the settlement, as does the trees and hedges which run along the western side of Little Heath Lane.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>continuing rounding off of the settlement edge of Reading. It is inappropriate for the Council to discount sites purely on basis of AONB without detailed landscape consideration. West Berkshire is dominated by AONB (74% of the district) which leads to large swathes of urban areas directly abutting the AONB. As a result, some of the most sustainable locations for small and medium scale development, well related to existing services and facilities are within the AONB. This is the case with Tilehurst as this part of the Eastern Urban Area directly abuts the AONB. Consideration of development opportunities in these areas should be based on sound landscaping principles.</p> <p>The Site should be included within the settlement boundary and allocated for development for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is visually well contained, and whilst on rising ground is not highly visible, nor located on an exposed ridge, landform or open slope.</li> <li>• It is well contained by boundary vegetation and is developed in part, and is therefore not an open undeveloped parcel.</li> <li>• It is not a recreational or amenity open space which extends into the countryside.</li> <li>• Existing woodland and tree belts on the western edge of the Site would form a natural western boundary to the settlement, and already assist in screening views of the western edge of Reading from the wider countryside.</li> <li>• It immediately adjoins the western settlement boundary of Reading and is set within the context of existing residential areas to the immediate north, north-east, east, south-east and south, and is therefore not an isolated area of potential development and is not physically or visually detached from the settlement of Reading.</li> <li>• Whilst the Site comprises areas of horse paddocks, these are physically and visually enclosed by the immediately surrounding woodland and vegetation, such that they do not visually relate to the open countryside, but more to that of the adjoining settlement edge of Reading.</li> <li>• It does not form an important gap between developed areas in</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<p>fragmented settlements.</p> <p>On this basis, the site presents an opportunity for development which is consistent with the existing settlement form and, could be successfully and sympathetically accommodated within the landscape.</p> <p>Changes sought:</p> <p>The Council should seek to accommodate further growth within and on the edge of the Eastern Urban Area in order to support Reading Borough Council's unmet need. Hall Place Farm in Tilehurst should be allocated to provide approximately 80 dwellings.</p>	
Bluestone Planning for Darcliffes Homes Ltd. (lpr2429)	<p><i>Representations and supporting plans, promoting allocations of land east of Sulham Hill between Barefoots Copse &amp; Cornwell Copse and Land to the east of Long Lane &amp; South Blackthorn Close, Tilehurst, are attached.</i></p> <p>Darcliffes Homes Ltd (hereafter 'Darcliffes') support the principle stated in policy SP1 Spatial Strategy of identifying the locations as set out in the settlement hierarchy in policy SP3 where residential development may take place. This is consistent with the guidance on the general approach to the delivery of new homes, as set out in the NPPF.</p> <p>The densities as set out in the policy are generally supported, although it should also be noted that higher density may also be achievable in certain locations, particularly around the Eastern Area. Careful and sensitive design can deliver higher density, without leading to unacceptable intensification.</p> <p>The policy also refers to the significant commitments throughout the District and as explained below, there are concerns that these either may not come forward during the Plan period and/ or are being built out at a rate which</p>	<p><u>Non-delivery of planning commitments:</u></p> <p>Policy SP12 of the emerging draft LPR made provision for 8,840 to 9,588 net additional dwellings (520 to 575 dwellings per annum). The target figure was 564 dwellings. The supporting text to policy SP12 identified a supply of 11,439 dwellings over the plan period.</p> <p>The NPPF expects authorities to follow the standard method to assess need, and it is considered that a housing requirement that is slightly higher than the Local Housing Need, demonstrating that the assessed need can be met, is appropriate. The use of a range to express the requirement introduces some flexibility.</p> <p><u>Imbalance between the numbers allocated to Newbury and the Eastern Area:</u></p> <p>Newbury and Thatcham are the largest settlements in the district and it is appropriate that the focus for development should be here. The Eastern Area is very constrained,</p>



Respondent (with lpr ref)	Response	Council Response
	<p>would mean that they are not appropriate for inclusion in the Adopted Plan and therefore alternatives will have to be sought.</p> <p>Policy SP3 sets out the settlement hierarchy and identifies the urban areas which will be a prime focus for housing. It is supported that the Eastern Urban Area will be a focus, although there is a significant imbalance between the numbers allocated to Newbury and Thatcham when compared to Eastern Area, with over 4,000 homes to the former and under 1,000 homes to the latter. This is not considered appropriate given the level of services and facilities provided to the Eastern Area.</p> <p>With regard to the Eastern Area specifically, it is stated that new allocations for Tilehurst and Burghfield will be made through NDPs. This is clearly dependent on the NDP process, which is lengthy and sometimes fraught with difficulties.</p> <p>At the time of writing, Tilehurst for example have not yet published their draft Neighbourhood Plan and therefore it will still be some time before this can be taken to and approved at referendum, and housing can start to be delivered in accordance with such allocations. Although Policy SP14 sets out that the Designated Neighbourhood Area should allocate 175 dwellings, there is no timeframe for when this may come forward or whether this number will be agreed.</p> <p>It should also be noted that in the HELAA the text regarding Tilehurst makes it clear that allocations will be made within the Local Plan Review where not allocated by the NDP.</p> <p><i>“Tilehurst</i></p> <p><i>8.31. Tilehurst Parish is designated as a Neighbourhood Area, and Tilehurst Parish Council are preparing a neighbourhood plan. The Parish Council have expressed an intention to include residential allocation(s) in the</i></p>	<p>with the AONB abutting the built up area of Tilehurst to the west of Reading and with substantial areas of floodplain to the south of Reading. In addition development is constrained by the presence of the AWE establishments at Burghfield and Aldermaston.</p> <p>Such constraints have been considered when assessing sites through the HELAA, SA/SEA, and site selection process.</p> <p><u>Tilehurst NDP and time taken to come forward:</u></p> <p>Allocations in Tilehurst had been proposed to be included within the neighbourhood plan that is being prepared by Tilehurst Parish Council and which will cover the whole of Tilehurst Parish. It is for this reason that the draft emerging Local Plan Review (LPR) did not propose any allocations in Tilehurst.</p> <p>Since the consultation on the emerging draft LPR, Tilehurst Parish Council has decided not to include any allocations within the neighbourhood plan, and it will instead comprise of development management policies. A part of the work on proposed submission (Regulation 19) version of the LPR, sites in Tilehurst will now be considered for allocation through SA/SEA and more detailed site selection work.</p> <p><u>Policies do not go far enough in bringing forward small and medium sized sites:</u></p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>neighbourhood plan. The site selection work will therefore be undertaken by the Parish Council.</i></p> <p><i>8.32. In the event that Tilehurst Parish Council choose not to include residential site allocations in the neighbourhood plan, then West Berkshire Council will pick up the site selection work and consider allocations through the LPR.”</i></p> <p>All other locations are to be treated as open countryside (as set out in Policy SP1) and therefore no sites in these areas could be brought forward in accordance with policy. It is therefore considered that housing allocations should also be made either independently or collaboratively in the Review Local Plan or the policy should be more flexibly worded in the urban areas.</p> <p>There is a concern that policies do not go far enough in bringing forward small and medium sized sites, particularly those located on the edge of the identified urban area settlements. As stated above, if such sites are not allocated in the Local Plan Review or in particular, a NDP, because an NDP has either not been developed or has been delayed, there is no mechanism for such sites to be approved in the future. This may be an issue of great concern where some of the larger strategic sites are not deliverable within the Plan period.</p> <p>It is also unclear from the supply calculations whether or not there has been an undersupply from the Core Strategy 2012 which has been carried forward. Sandleford Park was allocated in the 2012 Core Strategy and has not yet been granted permission. Clarification is sought as to how this has been dealt with and whether further sites should be allocated in this regard.</p> <p>The table in Policy SP13 also sets out that Sandleford Park seeks to accommodate up to 1500 dwellings, whereas the text in paragraph 6.12 states that only 1,000 houses will be delivered by 2037 and the remainder in the following Plan period.</p>	<p>medium and smaller sites (including brownfield sites within settlement boundaries) that can deliver housing sooner.</p> <p><u>Core Strategy undersupply and Sandleford Park:</u></p> <p>Regarding the supply calculations, there is no undersupply carried forward from the Core Strategy. National guidance is clear that this is factored into the standard method.</p> <p>Policy SP13 proposes the allocation of up to 1,500 homes at Sandleford Park. Table 2 includes only 1,000 units within the plan period to 2037, as delivery is expected to extend beyond the plan period.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites (including brownfield sites within settlement boundaries) that can deliver housing sooner. The Council is not relying on the total allocation at either Sandleford Park or North East Thatcham to meet the need up to 2027. Para 6.45 of the ELPR states that delivery of at least 1,250 dwellings is anticipated within the plan period.</p> <p>Outline planning permission (20/01238/OUTMAJ) was granted in May 2022 for up to 1,000 dwellings on the eastern part of the site.</p> <p><u>Small and medium sized sites:</u></p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant</p>

Respondent (with lpr ref)	Response	Council Response
	<p>This approach is also inconsistent with the encouragement of developers to bring forward small and medium sized sites. The HBF document (2017) 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes' notes (p.29) that:</p> <p><i>“For understandable political and financial reasons, planning authorities have increasingly sought to allocate very large strategic sites for residential development in order to satisfy its requirement to demonstrate a five-year land supply. Large sites on the edge of settlements can be less likely to spark political controversy as they are slightly removed from existing communities. For the very same reason, however, they may require substantial infrastructure and up-front financing resulting in relatively lower delivery rates in the early years of the site’s existence making rapid delivery unrealistic.”</i></p> <p>The latest research from Lichfields (February 2020) 'Start to Finish What factors affect the build-out rates of large-scale housing sites? Second edition' discusses the lead times on large sites and the data is not encouraging:</p> <ul style="list-style-type: none"> <li>• Schemes of 500-999 dwellings take on average approximately 5.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 1,000-1,999 dwellings take on average between 6.9 and 7.0 years from validation of the initial outline application to delivery of the first house. These do not contribute any completions in the first five years.</li> <li>• Schemes of 2,000+ dwellings take on average approximately 8.4 years from validation of the initial outline application to delivery of the first house. These do not contribute any</li> </ul>	<p>numbers of affordable homes and a larger number of medium and smaller sites (including brownfield sites within settlement boundaries) that can deliver housing sooner. The Council is not relying on the total allocation at either Sandleford Park or North East Thatcham to meet the need up to 2027. Paragraph 6.45 of the draft emerging LPR states that delivery of at least 1,250 dwellings is anticipated within the plan period.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>completions in the first five years. 6.1 years of this are taken up with the planning application process. (see figure 4 of the Lichfields document)</p> <p>In contrast, smaller sites between 0 and 99 dwellings typically deliver within 3.3 years of the validation of the first application.</p> <p>On this basis it is considered that the following should be taken into consideration:</p> <ul style="list-style-type: none"> <li>• SP16 Sandford Park is allocated for 1,000-1,500 dwellings, taking the above into account, it would take between 6.9 – 7.0 years until the first dwelling is built based on the above assumptions. It should be noted however that the site has been allocated since 2012 and although a number of applications have been submitted, there remains outstanding issues and the site still does not have permission. It is therefore considered that given the length of time taken to date, that the site is unlikely to realistically deliver the numbers proposed.</li> <li>• SP17 North East Thatcham is allocated for 2,500 dwellings, taking the above into account, it would take 8.4 years from validation until the first dwelling is built, based on the above assumptions. There has been no application to date. It is unlikely therefore that any dwelling would be built until approximately 2030 and following this, the average annual build-out rate for a scheme of 2,000+ dwellings is an average of 160 dpa (as set out in the aforementioned Lichfields report). On this basis, with the Plan period up to 2037, this would equate to 1,120 dwellings during the Plan period and not 2,500 as set out. It is unrealistic that on an allocation of this size that dwellings could be brought forward to the market at a faster rate.</li> </ul> <p>The HBF document goes on to advise that (p.29-39):</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>“Once allocated, LPAs are systematically failing to assess on an ongoing or regular basis, the actual delivery achieved against the targets indicated in its local plan. For instance, by allocating one or several very large sites to achieve a five-year supply of land, delays progressing one site through planning will have a substantial impact on the ability of the authority to adequately plan for the number of homes required.....</i></p> <p><i>..... To meet demand for housing, we need more sites of all sizes allocated. Indeed, large sites often deliver new homes at astounding rates, particularly in areas where the market is strong, but small sites are consistently efficient in their delivery. For this reason, the allocation of a wider range of sites within local plan allocations would not only help increase plurality in the housebuilding sector, it would also improve the chances of local authorities’ meeting ambitious supply trajectory plans.</i></p> <p><i>Achieving this all-round positive outcome need not involve overly prescriptive diktats. A subtle shift in policy emphasis, along with a greater focus on ongoing delivery within a local plan period would help to achieve a positive change in behaviours at a local level.....</i></p> <p>The above is also irrespective of the fact that many of the smaller HSA sites are already near completion and at least some the numbers should have potentially been counted before the Plan period. Therefore, these numbers are unlikely to be taken forward in the Adopted Local Plan.</p> <p>In addition, based on last published WBC housing monitoring report (2019), there was a projected windfall allowance of 362 dwellings for the five years up to 2024. To cover the Local Plan Review period to 2037 would suggest a windfall figure of 1,231 dwellings should be included in the supply and not 1979 as currently stated in Table 2 Housing Supply at March 2020. Therefore, there is real danger that the delivery target will not be met due to a reliance on windfalls. This makes very clear that when combined with a lack of flexibility / unclear non-implementation</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>allowance, that there is a need for more allocation sites to bridge the shortfall, in the order at least 700 units.</p> <p>In summary, there is a clear under provision for new sites and further small to medium sites should be considered with flexibility to allow sites on the edge of the urban areas identified to come forward to ensure that sufficient sites can be delivered within the Plan period.</p> <p><b>Omission Sites</b></p> <p>Darcliffe Homes are promoting two omission sites for inclusion as allocation sites in the emerging Local Plan. They are located in the Eastern Area of the District on the edge of the built-up area and are not affected by the 'significant constraints' referred to in paragraph 4.13. The sites lie outside of the AONB designation, are not affected by flood zone 2/3 and nor are they within the SEPZ area for Aldermaston or Burghfield (including as extended).</p> <p>Paragraph 4.13 also states that in regard to the Eastern Area, <i>"There are also limited opportunities for redevelopment of brownfield land within existing settlement boundaries"</i>. Whilst the omission sites are greenfield sites, they are directly adjacent to the built-up area and are well contained with trees and screening.</p> <p>They are both sites which will achieve a sustainable form of development, being well located to benefit from proximity to local services and facilities. It is highlighted in paragraph 4.11 of the emerging Plan that these urban areas have a <i>"close functional relationship with Reading and will continue to benefit from the facilities and services it provides"</i>. This would certainly be the case in each of the sites proposed and further details are set out below.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Each site will contribute to the range of smaller sites that are needed to complement the larger scale sites that are currently allocated in the emerging Local Plan.</p> <p>Plans of each of the sites are enclosed with these representations. Darcliffe Homes request that these sites be allocated in substitution of some of the capacity of the larger sites as discussed above, because by allocating them this will:</p> <ul style="list-style-type: none"> <li>• help to deliver housing within the first five years of the Plan period, in contrast with the 5-8.4 year period to commence development following submission of an application on the larger allocated sites (500+ dwellings), thus helping to maintain a buoyant housing land supply</li> <li>• provide a wider portfolio of small / medium sites which will support local housebuilding, thus complying with paragraph 68a of the NPPF</li> <li>• enable development to take place in the otherwise heavily constrained Eastern Area, not only taking advantage of the services and facilities that this location has to offer, but also the significant employment opportunities and transport links, thus ensuring that those areas of the District with the highest local demand for dwellings are provided for in terms of appropriate housing development</li> <li>• provide benefits for the local economy through the employment of local trades and professionals during the planning, construction and sales processes</li> <li>• provide much-needed affordable housing on one of the sites due to their size (see representation on Policy SP19).</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<p>Changes sought:</p> <p>It is considered that policies SP1 and SP3 should be reworded to provide more flexibility.</p> <p>Other nearby Local Planning Authorities have recognised the issue that can arise where a NDP is not delivered. For example, South Oxfordshire District Council in their Policy H1 of the recently adopted Local Plan (but see also their Core Strategy which also contained a similar policy) set out that:</p> <p><i>“Where Neighbourhood Development Plans are not progressed in larger villages and market towns, planning applications will be considered against the housing delivery targets for the towns and larger villages set out in this Plan.”</i></p> <p>A form of words reflecting the above, would ensure that there would be sufficient flexibility to take into account any NDP problems and Policy SP1 should be amended accordingly, with and SP3 and DC1 given clarification in this regard.</p> <p>To reflect this and the potential undersupply of housing, further small to medium sites should be also be added to policies SP13-14, with any update to SP12 as a result. Darcliffe Homes are proposing two such sites within the Eastern Urban Area, which would deliver up to 80 dwellings.</p> <p>The supporting text at paragraph 6.22 would also need to be updated in this regard.</p> <p>The addition of further small to medium sites such as these will require a re-consideration of the capacity of the strategic-scale sites to reflect realistic expectations. Revising the site capacities slightly downward to accommodate a shift of dwelling numbers will not however adversely affect the ability of the promoters to bring the strategic sites forward for</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>development, but will allow a longer period for developing out the entirety of the site, which is likely to run into the following Plan period.</p> <p>Allocating additional small to medium sites will also have a positive effect on the smaller scale and local housebuilding industry, which includes Darcliffe Homes, in providing opportunities that will help to continue to sustain this important re-emerging sector of the housebuilding industry.</p> <p>Darcliffe Homes request that the promoted sites (<i>see attached representation and location plans</i>) be allocated in substitution of some of the capacity of the larger sites.</p>	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: SP15 Sites allocated for residential development in North Wessex Downs AONB****(Proposed Submission LPR Policy: SP15 Sites allocated for residential development in North Wessex Downs AONB)**

Number of responses received: 32

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
No comments received		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr140)	<p>Support policy.</p> <p>The HSA18/RSA21 site is a fait accompli. However the allocated site boundary does not now match the approved development site boundary and should be adjusted.</p> <p>The NDP housing delivery requirement of approx. 55 for the period to 2037 is realistic.</p>	<p>Support for policy noted</p> <p><u>HSA18/RSA21:</u></p> <p>Policy HSA18 of the Housing Site Allocations Development Plan Document (HSA DPD) and policy RSA21 of the emerging draft Local Plan Review (LPR) relate to the allocation Land East of Salisbury Road in Hungerford.</p> <p>It is proposed to remove the allocation from the LPR as development at the site is now close to completion.</p>
Shaw-cum-Donnington Parish Council (lpr209)	<p>Support policy.</p> <p>No comment.</p>	Support for policy noted.

Respondent (with lpr ref)	Response	Council Response
Kintbury Parish Council (lpr1724)	<p>(Same comments for RSA31) subject to planning</p> <p>Kintbury Parish Council acknowledges that there is in West Berkshire a need/requirement for more housing and, in particular, Affordable and Social Housing. In this respect, Kintbury has to play its part, on a limited basis, in accordance with the Plan.</p> <p>Kintbury Parish Council does raise the following concerns:</p> <ul style="list-style-type: none"> <li>• Kintbury residents are very concerned about the increasing traffic through the Village centre and, particularly, the effect on the Conservation Area where the streets are of C18th origin or earlier, are extremely narrow with many streets without footways or ones that are inadequate. There are a number of pinch-points which result in congestion and create pollution where homes are close to the highway. In addition the growth of traffic already traversing the Village has resulted in long queues trying to cross the railway creating more congestion and pollution in the centre together with a difficult access to the A4, where most of the traffic is headed. Any development will have a deleterious effect on the level of traffic needing to pass through the centre of the Village.</li> <li>• The proposed site (KIN 6) at The Haven is located outside of the Village Settlement Boundary and is in the AONB where the scenic quality is high and is a valued landscape. The site is surrounded by open fields and the Recreation Ground forming a part of the surrounding countryside and landscape. There is concern that the development could cause harm to the landscape quality and the value of the AONB. The site will be visible from highways and public rights of way.</li> <li>• Access to KIN 6, via The Haven, could worsen the environment for residents of The Haven and the resulting</li> </ul>	<p>Comments noted.</p> <p>Comments noted.</p> <p><u>Traffic:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern.</p> <p>Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:</p> <p><u>'A Transport Statement will be required as part of any planning application.'</u></p> <p><u>AONB:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>removal of the garage site could create more on street parking unless it is replaced as part of the development. If the development is included in the Local Plan Review thought should be given to improving the environment within The Haven including providing additional parking and other facilities to take account of the environmental damage caused by the development.</p>	<p>A Landscape Sensitivity Assessment (LSA) was prepared in 2011. The LSA advised that development on the site would be acceptable, subject to certain recommendations. The recommendations from the LSA will be incorporated into the policy as follows:</p> <p>(a) <u>'The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>(i) <u>Replacement of the conifer hedge to the western boundary with more appropriate planting;</u></li> <li>(ii) <u>Views from the surrounding countryside, Public Right of Way, and the neighbouring recreational field would need to be carefully considered; and</u></li> <li>(iii) <u>New planting to integrate the buildings into the landscape.'</u></li> </ul> <p>In addition, the policy will also include the following requirement for a Landscape and Visual Impact Assessment: <u>'The development design and layout will be in accordance with policy SP7 and further informed by a full detailed Landscape and Visual Impact Assessment.'</u></p> <p>As part of the assessment of the site for the HELAA, the AONB Unit commented that there is the potential for development and that a landscape assessment would be required.</p> <p><u>Access:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available. The policy for the site will include the following criteria as follows: <u>'Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated. A Transport Statement will be required as part of any planning application.'</u></p>

Respondent (with lpr ref)	Response	Council Response
Chieveley Parish Council (lpr1722)	<p>Object to policy.</p> <p>site ref, RSA26 Land at Chieveley Glebe</p> <ol style="list-style-type: none"> <li>1. There is insufficient information on this proposed allocation and how the form of development proposed. This is evident when compared to other allocation proposals set out in the Plan. The issues mentioned below are of particular concern.</li> <li>2. Following the Parish Plan consultation there is a need in the Chieveley to provide a new burial ground. Site RSA 26 is also the site of the most likely location for a new burial ground. There is no mention as to how this will be achieved if RSA 26 goes ahead and as currently proposed the allocation would prevent the future development of a burial ground in this location.</li> <li>3. It is not clear how the site and/or individual dwellings would be accessed from East Lane, including whether there would be individual accesses to East Lane from the 15 dwellings.</li> <li>4. Traffic is already an issue in Chieveley, notably at the East Lane/High Street junction and around the Doctor's surgery. More development and accesses in this location would need full assessment.</li> <li>5. Impact on the environment including the landscape impact of the loss of hedgerows and trees and their protection.</li> </ol> <p>That said, Chieveley Parish Council agrees with the Council and its landscape assessment that the larger area of land at RSA 26 which is shown edged blue on the inset plan for this site should not be developed.</p> <p>Changes sought:</p>	<p>Comments noted.</p> <p><u>Information on the proposed allocation:</u></p> <p>Within the Regulation 18 draft emerging Local Plan Review (LPR) it was made clear that the detailed policy criteria for the new allocations was still to be developed.</p> <p>In the time available to prepare the draft emerging LPR for a Regulation 18 consultation in December 2020, it was unfortunately not possible to prepare detailed policies for the new residential allocations.</p> <p>A number of residential allocations within the draft emerging LPR have been retained from the Housing Site Allocations Development Plan Document (HSA DPD), which forms part of the current Local Plan. It is for this reason that some allocation policies were more detailed than others.</p> <p><u>Burial ground:</u></p> <p>At the time of the Regulation 18 consultation on the draft emerging LPR, West Berkshire Council (WBC) were unaware that the burial space available at St. Mary's Church was running out.</p> <p>As part of their Regulation 18 representations, the landowner of proposed allocation 'Land at Chieveley Glebe' suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p>

Respondent (with lpr ref)	Response	Council Response
	Removal of site RSA 26 from the Local Plan.	<p>The LSA recommends that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p> <p><u>Access and traffic:</u></p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Environmental impact:</u></p> <p>The site was promoted through the ‘call for sites’ for the Council’s Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary.</i></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Landscape assessment:</u></p> <p>Support for the LSA noted.</p>
Environment Agency (lprxx)	DELETE	DELETE
<b>General consultation bodies</b>		
West Berkshire Green Party (lpr1838)	We broadly support this policy.	Support for policy noted.
<b>Other stakeholders</b>		
Andrew Bower (lpr53))	<p>Object to policy. <i>Referring to proposed allocation in Chieveley (RSA26)</i></p> <p>This may not be the right time in the process to put forward our thoughts and feelings but given that we know nothing about how the process works, lockdown has not allowed us to talk with our</p>	<p>Comments noted.</p> <p><u>Location of site outside of village settlement / preservation of the look of the lane:</u></p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review .The settlement boundary criteria make</p>

Respondent (with lpr ref)	Response	Council Response
	<p>neighbours or anyone that could give us guidance, please forgive our lack of understanding.</p> <p>This is land and outside the village settlement and an area of outstanding natural beauty. If the land is to loose it's protection we would like to see the look of the lane preserved. That is of individually designed homes set back from the lane with ample parking and in a pretty leafy country village. It would be very sad to see urban footpaths and street lighting.</p> <p>The hedge to the south of the site is a feature of the lane and gives that country village feel to the lane and the village. It also holds back the rain water from the field that is in some parts 1meter higher than the road surface. Flooding would be concern should it be removed. When heavy rain falls in the High Street the drains in East Lane overflow and the lane becomes a torrent. Many of the bungalows to the south of the lane would be at risk of flooding if this water was any deeper.</p> <p>We would not want the existing homes on the south of the lane to loose any of their land to enable a road realignment to facilitate the added traffic and parking created by added development.</p> <p>Any new dwelling built here will be in the very best of locations we would like to see it add to the look of the lane and the village rather than detract from it. The proposed plots would be slightly smaller than the existing and on a deceptively sharp bend in the lane given that all vehicles associated with the building and occupation of the new dwelling will need to be parked on site, as there is no on street parking in the lane 15 dwellings may be a bit of a squeeze.</p> <p>Changes sought: The population continues to grow at an alarming rate housing is needed everywhere equally at the other end of the scale people</p>	<p>clear that boundaries will include sites allocated through the Local Plan process.</p> <p>The policy for the site will include a criteria that requires that the development design and layout will be informed by a Landscape Visual Impact Assessment:</p> <p><i><u>e. The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA).</u></i></p> <p><u>Location of site within AONB:</u></p> <p>The National Planning Policy Framework is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. To this end, a Landscape Sensitivity Assessment was carried out for the wider site area that was promoted for development. This advised against development across the whole site because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p> <p><u>Flood risk:</u></p> <p>The Environment Agency's surface water flood risk data does not show the site nor any of the properties along the south of East Lane to be at risk of surface water flooding.</p> <p>The emerging draft LPR policy on flood risk requires that on all development sites, surface water will be managed in a sustainable manner through the implementation of sustainable drainage systems.</p> <p><u>Road realignment:</u></p>



Respondent (with lpr ref)	Response	Council Response
	<p>die. This is church land and outside the village settlement. The village grave yard is nearing fullness, this land was proposed to become the new grave yard for the village. If we are to lose an area of outstanding natural beauty this would be the better option for the people of the village for today and the future.</p>	<p>There are no proposals to re-align East Lane, and the Local Highway Authority have not advised that the road needs re-aligning.</p> <p><u>Church land / burial ground:</u></p> <p>The site was promoted to the Council by the landowner, the Diocese of Oxford.</p> <p>At the time of the Regulation 18 consultation on the draft emerging LPR, West Berkshire Council (WBC) were unaware that the burial space available at St. Mary's Church was running out.</p> <p>As part of their Regulation 18 representations, the landowner of proposed allocation 'Land at Chieveley Glebe' suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommended that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>In light of the recommendations of the LSA, only a small amount of linear development is proposed along the frontage of East Lane.</p>
Tony Vickers (lpr540)	<p>Support policy.</p> <p>We believe many villages in the AONB could benefit from additional housing without compromising the landscape qualities. They would become more viable in economic and social terms with little or no</p>	<p>Support for policy noted.</p> <p><u>Additional housing in the AONB:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>disbenefit environmentally. We welcome the fact that some villages are undertaking Neighbourhood Planning.</p> <p>Changes sought:</p> <p>Details to follow in the RSA section and in our Regulation 19 response.</p>	<p>Sites have been allocated in the AONB, and policy SP2 (North Wessex Downs AONB) allows appropriate and sustainable growth that conserves and enhances its special landscape qualities. This is in line with the national planning policy context.</p> <p><u>Changes sought:</u></p> <p>Individual comments for subsequent policies are responded to in the relevant Council responses.</p>
Nataliya Topliss (lpr805)	Support policy.	Support for policy noted.
Ian Parsons (lpr830)	<p>Support policy.</p> <p>This makes good use of suitable sites and it protects possible sites of a more rural nature where development would be detrimental to their character and the value.</p>	Support for policy noted.
Kim Lloyd (lpr1854)	<p>Representation on proposed allocation RSA 28</p> <p>The development is likely to be detrimental to the Parish in a number of areas:</p> <ol style="list-style-type: none"> <li>1. It will add cumulatively to existing flood impacts in the village. The area was withdrawn from the WBC Local Plan in the last review on this point alone – nothing has substantially changed since this</li> <li>2. Adding a number of dwellings (15+) to this end of the village will lead to additional foul/sewage system impacts and flood potential impacts. We had significant sewage issues last winter, despite years of Thames Water ‘mitigation’ in the valley. The issue is real and unresolved, and this development would add to it.</li> </ol>	<p>Comments noted.</p> <p>Please see responses to Policy RSA28.</p> <p><u>Flood risk:</u></p> <p>The existing Local Plan did not include any allocations in Great Shefford. This was because there has been significant flooding in the village when the Housing Site Allocations Development Plan Document was being prepared. Since then, there are proposals for a flood mitigation scheme within Great Shefford.</p> <p>As part of the preparation of the Local Plan Review (LPR), Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA) have been prepared which consider the site. Sites within Great Shefford were not specifically considered within the SFRA prepared for the Core Strategy or HSA DPD.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>3. The proposed development area is on substantially higher ground than the existing development and will have a significant impact on existing dwellings at this point in the village. It will also lead to an increased view of new development in the village from surrounding footpaths and the A338 as this height will make a new development here more prominent, creating a landscape impact in the AONB.</p> <p>4. The location is unsustainable, it is in a rural village with no substantial public transport links, our public transport has been gradually reduced by WBC over the last 20 years</p> <p>Great Shefford Parish Council agrees that the area of land at RSA 28 which is shown edged red on the inset plan for this site should not be developed.</p> <p>Changes sought: Removal of site RSA 28 from the Local Plan.</p>	<p>The site itself lies within Flood Zone 1 whereby there is a low risk of flooding. The boundary of the site at its northern corner is at low risk of flooding from a surface water flow path during a 1 in 1000 year rainfall event. Development would need to be avoided on this part of the site, and this will be specified within the policy for the site.</p> <p>Groundwater emergence modelling identifies that the north eastern corner of the site is predicted to be affected by groundwater emergence during a 1 in 30 year and 1 in 100 year event. Development would need to be avoided on this part of the site, and this will be specified within the policy for the site.</p> <p>The site allocation for the policy will also require a Flood Risk Assessment as part of any planning application.</p> <p><u>Wastewater:</u> A Phase 1 and Phase 2 Water Cycle Study have been prepared and will be reflected in Policy RSA28 as follows</p> <p><i>i. <u>An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within this catchment; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;</u></i></p> <p><u>Visual impact</u> A Landscape Sensitivity Assessment (2011) indicated that development on the site would not cause significant harm to the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>landscape character, and subject to a number of mitigation measures development would be acceptable. It is a small site that is well contained by landform and housing, with hedges along the western and northern boundaries. Development could be accommodated and retain small scale pattern and not intrude into the wider AONB. The site lies on the lower valley side, mostly below 115m AOD, with just the north corner rising slightly above.</p> <p><u>Unsustainable location</u> Policy SP1 of the LPR sets out the spatial strategy for the district. The overall approach to development will be based on three spatial areas, one of which includes the North Wessex Downs AONB. The focus of development in each spatial area will follow the district-wide settlement hierarchy set out in policy SP3.</p> <p>Within the settlement hierarchy, Great Shefford is identified as a 'Service Village'. Service Villages are smaller rural settlements which offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs.</p>
<b>Landowners, site promoters and developers</b>		
Fisher German LLP for Mr M and W Musgrave and Begley (lpr1231)	<p><i>Complete representations from Fisher German LLP promoting land at Oxford Road, Chieveley are attached to representation.</i></p> <p>Object to policy</p> <p>We welcome and support the Council's acknowledgement that Chieveley should receive residential allocations. This will assist to ensure its long-term vitality and vibrancy by meeting local housing needs. Whilst in the AONB, high quality new development which fits with existing settlements is considered to have a limited impact on this designation. The failure to deliver sufficient housing will however have very real impacts on the day to day lives of residents, forcing young people away due to rising house prices</p>	<p>Comments noted.</p> <p><u>Additional development in Chieveley:</u></p> <p>Support for principle of residential allocations in Chieveley noted.</p> <p><u>Proposed allocation Land at Chieveley Glebe:</u></p> <p><i>Heritage impact:</i></p> <p>The Council is in the process of preparing Conservation Area Appraisals.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and lack of suitable available homes. Populations in rural areas will likely age, trends which can be seen locally and nationally, and average house occupancy will lower as children grow up and move away. This lowering and ageing of the rural population will have repercussions on the ability of services and facilities to stay open, which will lead to a gradual decline of sustainability. Chieveley has a high level of service provision, as demonstrated by the Settlement Audit, and this is something which must be supported by commensurate new housing, ensuring the vitality of the community.</p> <p>Concern is however raised at the Council's preferred choice of allocation, and it is not considered sufficient consideration has been had for the impacts of this scheme on the Chieveley Conservation Area and Grade II Listed Vicarage, as well as other listed buildings in the centre of Chieveley. The north of East Lane is the only open approach to the centre of Chieveley, its historic core. The development of this site will fundamentally change the transition into the village, reducing the sense of openness prior to arriving at the village's central crossroads, creating a more urban feel.</p> <p>This part of East Lane already has issues with on street parking associated with the centre of Chieveley, the existing housing and where the GP practice's car park overflows. New housing in this location will add to the burden, by adding to the number of cars parked here and forcing on-street parking onto the south side of the road to facilitate access to the dwellings. This will cause issues both in terms of traffic, but also in terms of having a damaging impact on this important approach to the conservation area, further creating an urban feel and having a negative impact on the character of the settlement. Draft Policy SC8 sets out that development proposals that affect the setting of a Conservation Area should assess and clearly demonstrate how the character, appearance and significance of the Conservation Area will be preserved and enhanced. It does not appear that this has been undertaken to support this allocation. It is not appropriate to await a</p>	<p>The site allocation policy will include a requirement for a Heritage Impact Assessment:</p> <p><u><i>g. The development design and layout will be further informed by a Heritage Impact Assessment.</i></u></p> <p><i>Highways impact:</i></p> <p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><i>Biodiversity impact:</i></p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>planning application, as the suitability of allocated sites is an issue that relates to this Plan's soundness and is vital to ensure the Plan is internally consistent.</p> <p>To facilitate the site, significant areas of mature hedgerow will need to be removed. This will have significant impacts on biodiversity, whilst further causing damage to the settlement character on the approach to Chieveley. The removal of such a large amount of mature, tall vegetation must be afforded significant weight, and serious concerns about the suitability of this allocation. It is noted that this is not even mentioned in the Site Proforma, which raises concerns to the extent that this has been considered in formulating the allocation.</p> <p>On the basis of the above, whilst we support the Council's decision to allocate in Chieveley, we do not support the Council's preferred choice and consider it should be deleted for the reasons listed above. We contend, that our client's land offers a suitable opportunity to allocate a smaller site, as has been the approach for the current draft allocation, although would be free from many of the constraints which impact the current allocation. It is not clear why a smaller parcel of the allocated site has been considered, when this approach would clearly overcome many of the issues which form the basis of other site omissions.</p> <p>It is also noted that the draft allocation site is not currently available, as there is an ongoing lease for the land. Whilst this is only to 2023, it does mean that the site is not available now and cannot be used in five-year housing land supply calculations.</p> <p>In respect of our client's site, the Council's stage 1 sieving document concludes:</p>	<p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary.</u></i></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Alternative site (CHI20):</u></p> <p>Site CHI20 (Land adjacent to Oxford Road, Chieveley) was promoted to the Council as part of the call for sites for the Housing and Economic Land Availability Assessment (HELAA). The HELAA is one of the evidence documents for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>Site CHI20 was assessed as 'not developable within the next 15 years' in the HELAA, and it was therefore not subject to further site selection work.</p> <p>Development of the whole site would be out of keeping with the existing settlement pattern, which is characterised by houses closely associated with the main roads.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>“Development would result in harm to the AONB, and would be inappropriate in the context of the existing settlement form and pattern.</i></p> <p><i>Highways concerns about the lack of pedestrian route into Chieveley, and difficulties in providing one.”</i></p> <p>Linear development similar to that allocated by the Draft Local Plan, on Graces Lane and/or East Lane would have no more impact in terms of harm to the AONB than the preferred allocation, and arguably even less so when having regard for the potential harm to historic designated assets associated with the current allocation. Linear development would also not be inappropriate in terms of existing settlement form and pattern, it would be entirely in accordance with the prevailing settlement form, which is frontage developments onto the existing road network. Whilst the highways concern is noted, it is clearly not a demonstrable issue for existing residents, and it would equally be applicable to the draft allocation, so cannot reasonably form a reason for exclusion.</p> <p>Development on our client’s site would have a highly limited impact on the historic core of Chieveley, unlike the draft allocation, by virtue of being located away from the historic core of the settlement, its Conservation Area and Listed Buildings. Development here would also not impact on highways, as on street parking is less of an issue here, and there isn’t the pressure for parking from the services and facilities in the village centre.</p> <p>Whilst there would need to be some removal of hedgerow, it is considered the ecological impact would be far less than the draft allocation. Particularly so on land north of Graces Lane, as access could be gained from east of the public right of way, where there is only low-level scrub. This would have a significantly less impact than that proposed by the draft allocation. The removal of this</p>	<p>The 2011 Landscape Sensitivity Assessment identified that the northern section of the site adjacent to the road is important open countryside at the entrance to the village, and would not be suitable for development. It went on to note that if the north west corner of the site was developed, thus extending housing back from the roads, the straight, strongly vegetated edge of the settlement would be lost.</p> <p>As part of the assessment of the site within the HELAA the Local Highway Authority advised that a further pedestrian route is possible onto East Lane, but the footway would need to be completed along East Lane to link with existing footways to the west. However it is not possible to provide a convenient pedestrian route along Graces Lane into Chieveley which is a desirable pedestrian route. On this basis the Local Highway Authority advised that they did not support the site.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>vegetation is considered to have a limited impact on settlement character, unlike the removal of the mature vegetation on the draft allocation, which will have more significant impacts.</p> <p>On the basis of the above, it is considered that there is compelling justification to remove the allocation and replace it with land under our client’s control. As referenced above, we do not consider sufficient justification has been provided as to why the Council have considered a smaller section of the draft allocation, and seemingly not any omission sites. This approach is prejudicial to those landowners whose sites have been excluded, as the approach taken has not been consistent. Clearly, we contend if that approach is adopted in respect of our client’s land, there are two opportunities to allocate land (linear development along Graces and East Lane) which are demonstrably preferable to the Council’s preferred allocation, for the reasons set out above.</p> <p>We also consider that land under our client’s control can be allocated to assist and deliver any shortfall of housing land supply, particularly to assist in meeting any needs arising in respect of the Council’s preferred allocations, particularly the strategic allocations. Despite being in the AONB, Chieveley is a sustainable settlement which can deliver a higher quantum of growth than is currently proposed, without causing any undue harm to the AONB.</p> <p>Changes sought:</p> <p>On the basis of the above, it is considered that there is compelling justification to remove the allocation and replace it with land under our client’s control. As referenced above, we do not consider sufficient justification has been provided as to why the Council have considered a smaller section of the draft allocation, and seemingly not any omission sites. This approach is prejudicial to those landowners whose sites have been excluded, as the approach</p>	



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	<p>taken has not been consistent. Clearly, we contend if that approach is adopted in respect of our client's land, there are two opportunities to allocate land (linear development along Graces and East Lane) which are demonstrably preferable to the Council's preferred allocation, for the reasons set out above.</p> <p>We also consider that land under our client's control can be allocated to assist and deliver any shortfall of housing land supply, particularly to assist in meeting any needs arising in respect of the Council's preferred allocations, particularly the strategic allocations. Despite being in the AONB, Chieveley is a sustainable settlement which can deliver a higher quantum of growth than is currently proposed, without causing any undue harm to the AONB.</p>	
Wey Planning Ltd for Neville Baker Estate (lpr1273)	<p>Object to policy.</p> <p><b><i>Landscape Capacity Assessment for Land at Station road, Hermitage attached to representation.</i></b></p> <ol style="list-style-type: none"> <li>1. We support the retention of sites RSA 29 and RSA 30 in the list of housing sites in the AONB allocated under Policy SP15 and the inclusion of a housing requirement for the Hermitage Neighbourhood Area. However, in light of our comments in relation to Policies SP1, SP2 and SP3, it is considered that an increase in the amount of new housing development on new allocated sites in the AONB, including an increase in the housing requirement for the Hermitage Neighbourhood Area to reflect the role and function of Hermitage and the availability of suitable development opportunities at the settlement, is necessary to deliver the housing and other objectives of the Spatial Strategy in respect of the AONB.</li> </ol>	<p>Support for the retention of sites RSA29 (Land off Charlotte Close, Hermitage) and RSA30 (Land adjacent to The Haven, Kintbury) noted.</p> <p>The Council was informed in February 2022 that the Hermitage NDP will no longer be allocating housing sites and so the Council has considered if there are appropriate opportunities for development as part of the LPR.</p> <p>The site at HER5 (Land adjacent Station Road, Hermitage) has been subject to a Landscape Sensitivity and Capacity Assessment that was prepared in May 2022. This concludes that development across the whole site would have a significant impact on key landscape characteristics and valued features of this area of the AONB and would not be appropriate. Development across a small area in the eastern part of the site could be considered further, subject to the retention of boundary vegetation and the careful consideration of the footpath route. Development should be contained in the eastern part of site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2. Policies SP1 and SP2 state that the North Wessex Downs spatial area will have “appropriate and sustainable growth” but are silent on what constitutes appropriate and sustainable growth in terms of the amount of new housing development to be provided in the AONB over the plan period. Nevertheless, it is clear from Paragraphs 4.16 and 6.23 of the WBLPR supporting text and from Paragraph 4.4 of the Interim Sustainability Appraisal Report that the Council is proposing a reduction in the amount of new housing development in the AONB over the plan period 2020 – 2037 compared with current planned levels of provision (Policy ADPP5 of the CS makes provision for up to 2,000 net additional dwellings between 2006 - 2026 at an average rate of 200 dwellings per annum), even though the level of provision in the CS represents a shortfall against the local housing needs of the AONB to 2026.</p> <p>3. In addition, as Paragraph 4.4 of the Interim Sustainability Appraisal makes clear, the amount of housing provision in the AONB represents a reduction in the proportion of new dwellings to be delivered in the AONB relative to the overall housing requirement for West Berkshire over the plan period 2020 – 2037, due to an increased urban focus on new housing provision, especially upon the Newbury/Thatcham urban area.</p> <p>It is considered that the proposed reduction in the amount of new housing to be delivered in the AONB (both absolute and relative) will not achieve “appropriate and sustainable growth” because it will result in significant under-provision of new dwellings in the AONB over the plan period. This will have unacceptable consequences in terms of meeting local housing needs (both market and affordable), supporting the local economy, facilities and services and maintaining vibrant and balanced communities.</p>	<p>In relation to Policy SP15, the housing requirement for the Hermitage Neighbourhood Plan is proposed to be amended to zero in light of the above.</p> <p>It is noted that an increase in the amount of new housing is sought in the AONB. Potential opportunities for development have been identified in the HELAA with the focus for development in the LPR following the settlement hierarchy set out in policy SP3.</p> <p>Allocations for individual settlements will depend on the availability of suitable land for development and each settlement at the same level in the hierarchy will have different opportunities and constraints.</p> <p>However, the conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals in the AONB.</p> <p>Sites have been allocated in the AONB, and policy SP2 allows appropriate and sustainable growth that conserves and enhances its special landscape qualities. This is in line with the national planning policy context.</p> <p>Newbury and Thatcham are the largest settlements in the district and it is appropriate that the focus for development should be here.</p> <p>Development opportunities are constrained in the AONB, a nationally designated exceptional landscape. The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals in the AONB.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>4. Paragraph 35 of the NPPF requires that for the Spatial Strategy to be justified, it should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.</p> <p>6. The only “evidence” in the WBLPR seeking to justify the low and reduced level of new housing proposed in the AONB overall, and on sites allocated under Policy SP15 in particular, is to be found at Paragraph 6.23 of the supporting text, which seeks to justify the limited and reduced scale of new housing development on the basis of the need to respect the special characteristics of the AONB.</p> <p>7. In this regard, the HELAA identifies a total of 42 housing sites in the AONB which the Council regards as “potentially developable”, subject mainly to the need for further landscape assessment and yet the Council has not undertaken any further landscape assessment of these sites to establish the potential of sites within the AONB to deliver additional housing development without causing harm to its special characteristics. In short, there is no evidence to support the Council’s approach.</p> <p>8. In the absence of such evidence, it is not possible to conclude that an alternative strategy based on an increased level of housing provision in the AONB would not respect the special characteristics of the AONB. Therefore, it is considered that the limitation on the (existing low) level of new housing provision in the AONB implied by Paragraphs 4.16, 4.18 and 6.23 of the WBLPR and confirmed by Paragraph 4.4 of the Interim Sustainability Appraisal is not an appropriate strategy and is unsound.</p> <p>9. Paragraph 6.54 of the WBLPR confirms that the Council regards the provision of affordable housing as a priority throughout the District and allocated housing sites will likely be an important, if not</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>the primary, source of affordable housing in the AONB over the WBLPR plan period. However, the total amount of new housing provision to be delivered in the AONB on sites allocated in the WBLPR and sites to be delivered in NDP's in accordance with Policy SP15 is 500 dwellings, of which approx. 182 dwellings will be affordable (based on Policy SP19), at an average rate of less than 11 affordable dwellings per annum. This compares with an identified need for 1,717 affordable dwellings in the AONB over the period 2018 - 2036, at an average delivery rate of 101 dwellings per annum (Table 9.1 of the Updated Housing Needs Evidence Final Report). In other words, the total supply of affordable housing coming from the sites allocated under Policy SP15 will meet little more than 10% of the affordable housing needs of the AONB over the plan period.</p> <p>10. In addition, there is no prospect of any increase in the supply of affordable housing in the AONB as a result of Policy DC 15 Entry Level Exception Sites because the exception does not apply in the AONB and because Policy DC 16 relating to Rural Exception Housing identifies that the conservation and enhancement of the natural beauty and special qualities of the AONB is an overriding consideration, it is likely that few, if any, such sites will come forward. Furthermore, it is unrealistic to rely on windfall sites to bolster significantly or even provide a steady supply of affordable housing. Accordingly, as the CS Inspector acknowledged in Paragraph 78 of his Report, the need for affordable housing in the AONB is most likely to be met by securing a proportion of such housing from market housing developments. Realistically, this can only be achieved by increasing the number of new housing sites allocated under Policy SP15 and increasing the housing requirements for the designated Neighbourhood Areas, such as Hermitage, in a manner consistent with its role and function and the suitability and development capacity of available sites.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>11. As noted in our comments on Policy SP2, subject to further landscape assessment of potential housing sites to establish that they are capable of being developed without causing harm to the natural beauty and scenic qualities of the AONB, the number of additional new housing sites and/or the housing requirements for the designated Neighbourhood Areas identified in Policy SP15 should be increased, with the aim to deliver an overall housing requirement for the AONB of up to 1,680 – 1,870 new dwellings over the WBLPR plan period.</p> <p>12. Whilst the inclusion of a housing requirement for Hermitage of 20 dwellings in Policy SP15 confirms that the Council considers Hermitage to be an appropriate and sustainable location for new housing development, no justification has been given for this figure or evidence to support it. In this context, it should be noted that in terms of services and facilities, our analysis identifies Hermitage as the second ranked Service Village in the AONB and West Berkshire overall, after Compton (see comments on Policy SP3). The Pirbright Institute site at Compton is allocated under Policy SP15 for 140 dwellings and whilst acknowledging that special circumstances applied to the allocation of the Pirbright Institute site, it is clear that notwithstanding its poor accessibility, the Council regards Compton as a sufficiently sustainable location to accommodate 140 dwellings. On that basis, we consider that Hermitage has the potential to accommodate more than the 45 dwellings currently proposed under Policy SP15 (25 on WBLPR sites and 20 on an NDP site(s)).</p> <p>13. The HELAA identifies two sites in Hermitage as “potentially developable” or “potentially developable in part”. These are HER4 Land adjacent to Statin Road and HER5 Land at Kiln Farm, west of B4008.</p> <p>14. In relation to the HER4 site, the Neville Baker Estate is promoting a development of 55 – 60 dwellings on a net developable</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>area of 2.9 hectares at a density of 20 dwellings per hectare net (ie excluding the land required to provide public open space, land for a community facility, the access feeder road from Newbury Road, a substantial landscape buffer and the retention of Station Road and heritage assets of local significance), in accordance with a masterplan submitted to the Council on 16th August 2018. In this regard, the officer's calculation of development potential undertaken at Stage 2a of the HELAA is incorrect because it mistakenly assumes that the developable area of 2.9 hectares is a gross figure, from which land for public open space etc needs to be deducted. We request that the HELAA is amended accordingly.</p> <p>15. The HELAA regards the HER4 site as “potentially developable” on the basis that the suitability of the site is currently unknown. This is because the HELAA identifies the need for further assessment of the impact of development on the landscape is necessary and had not been undertaken at the time the HELAA was last updated. A robust and up-to-date assessment of the Landscape Capacity of the site has now been undertaken on behalf of the Neville Baker Estate and submitted to the Council, which clearly demonstrates that the site is able to accommodate 55 – 60 dwellings without causing harm to the natural beauty and special qualities of the AONB. As a result, we consider that the site is suitable for development and that it should be regarded as developable.</p> <p>16. The HELAA regards the HER5 site as “potentially developable in part” because development on the whole site (5.8 hectares) would result in the coalescence of Hermitage with Oare (a historic settlement). The site promoter proposes a net developable area of 3.7 hectares, which the HELAA states could accommodate 74 dwellings. It goes on to say that development of part of the site may be acceptable, subject to further landscape assessment, but this work has not yet been undertaken. Therefore, until further</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>landscape assessment has been undertaken, it is not possible to establish the suitability and development capacity of the HER5 site.</p> <p>17. Our comments on Policy SP3 highlight the importance of ensuring that the housing requirements for designated Neighbourhood Areas are based on robust and up-to-date evidence of the suitability and development potential of available sites. This particularly applies to the Policy SP15 housing requirements for designated Neighbourhood Areas located within the AONB, where further assessment of landscape capacity is required to confirm the suitability and development capacity of sites and ensure that the special characteristics of the AONB are respected. In this regard, it is apparent that the housing requirement of 20 dwellings currently proposed for the Hermitage Neighbourhood Area is not justified or supported by proportionate evidence on the basis that the Council has not undertaken the further landscape assessments required to establish the suitability and development potential of available sites.</p> <p>18. To address this shortcoming, we have submitted a Landscape Capacity Assessment of the HER4 site to the Council under separate cover, which demonstrates that a development of 55 – 60 dwellings can be accommodated on the HER4 site without causing harm to the natural beauty and special characteristics of the AONB. Therefore, should further landscape assessment of the HER5 site by the Council establish that it is suitable and has a development potential of more than 20 dwellings, the housing requirement for the Hermitage Neighbourhood Area should be increased.</p> <p>19. The increased requirement will contribute towards the necessary increase in housing provision in the AONB over the plan period to better meet local housing needs, support the local economy, facilities and services, and maintain vibrant and balanced communities.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Changes sought:</p> <p>1. Subject to the further landscape assessment of potential housing sites identified in the HELAA to establish the overall capacity of the AONB to accommodate new housing development without causing harm to its special characteristics, the number of housing site allocations and the housing requirements for the designated Neighbourhood Areas identified in Policy SP15 should be increased, in order to maintain the current level of housing provision for the AONB set out in the Core Strategy over the WBLPR plan period. (See our comments on Policy SP2 for further detail).</p> <p>2. The proposed housing requirement of 20 dwellings for Hermitage is not justified and is not based on any robust and up-to date evidence of the suitability and development capacity of available housing sites identified in the HELAA. Should further landscape assessment of the HER4 and HER5 sites confirm one or both are suitable and have a development potential of more than 20 dwellings, the housing requirement for Hermitage should be increased.</p>	
Colin and Jacqueline Maclean (lpr1336)	<p>Object to policy.</p> <p>We would like to comment on Site Allocation for Residential and Mixed Use Development in the North Wessex Downs AONB Policy SP15.</p> <p>We have read the HELAA Report and would like to comment on para 8.79, 'The remaining 4 sites (Brad2-3, Brad5-6)' were considered reasonable alternatives for development.....'</p> <p>We are the owners of the land in Brad 2 and Brad 3 which 'are not recommended for allocation'. We are puzzled by this because</p>	<p>Comments noted.</p> <p>It is proposed to expand the settlement boundary around much of BRAD2 and BRAD3. Consultation will occur at the time of consultation on the submission version of the Local Plan Review. This would then allow the principle of development to be acceptable, subject to compliance with development plan policies.</p> <p>Now that the site at Stretton Close (RSA24) has been allocated, and outline and reserved matters permission granted, RSA25 is proposed to be allocated, and would be read alongside this site. The AONB Board comments the site would be a logical extension. Appropriate landscaping would be required in the site specific criteria.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>when HM Inspector over-rode the Council's decision not to allow RSA 24 / HSA22 land off Stretton Close to be allocated for house building, the Inspector made the point that the land referred to in Brad 3 was also suitable of building, similarly to land off Stretton Close, but it had no access. It is quite possible for us to provide access, in several ways, through our land at Crack Willow.</p> <p>Furthermore, as the Montessori school has full planning permission for its one main building and three lodges, which have been there and in use for many years, this site (Brad2) must also be a very serious contender for allocation</p> <p>We note that the Michael Wheat Report on the access options to the land to the North of Stretton Close (Brad 5), observed that access through the land of Crackwillow would not be acceptable unless the Crack Willow residence was demolished and because although this standard of access could serve up to 50 dwellings, this could not be possible without improvement to Cock Lane. He also refers to the fact that traffic generated by the Montessori Nursery School could be offset by the traffic generated by the residential development. He goes on to conclude that a smaller number of dwellings would be considered acceptable in terms of traffic impact or a greater number of further improvements could be made to Cock Lane.</p> <ol style="list-style-type: none"> <li>1. We are therefore surprised that considering HM Inspector's opinion that housing could be allowable on Brad 3 and, because we now know that access could be available via land at Crack Willow, that this site has not been allocated for consideration, we wish to know why Brad 2 and 3 were not recommended for allocation.</li> <li>2. We would also observe that the Montessori School had permission to accommodate 36 pupils meaning that for over 20 years traffic movements of well over 50 per day were generated without any adverse incidents of any sort.</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Secondly, during the planning permissions for the Montessori School, we obtained a professional assessment, by a road and traffic expert, that showed that Cock Lane could easily accommodate this increased movement of traffic. The real issue faced in Cock Lane is the inappropriate parking by parents and services accessing Bradfield Primary School.</p> <p>Please also note that we are concerned and dismayed that this Consultation has only been brought to our attention within the past three days by the Chair of our Parish Council and the consultation ends at the end of this week!</p>	
Barton Willmore for Donfield Homes Ltd.	<p>Object to policy.</p> <p><b>See attachments for full response.</b></p> <p>We <u>do not agree</u> with the Council's approach of ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas.</p> <p>In considering sites promoted within the call for sites, the Council have ruled out all sites which do not fall within the service villages, rural service villages or urban areas.</p> <p>At paragraph 78, the NPPF states:</p> <p><b><i>“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of</i></b></p>	<p>Comments noted.</p> <p>In some smaller settlements, which includes Upper and Lower Basildon, settlement boundaries are drawn around the built up areas. The principle of development is acceptable within the settlement boundaries of such areas, and therefore aid in supporting local communities and services.</p> <p>Settlement boundaries have been reviewed as part of the Local Plan Review, and will be consulted on as part of the submission version of the Local Plan Review.</p> <p>Policy DM1, which follows the NPPF, allows limited infill development in settlements with no settlement boundaries. The Local Plan Review is therefore flexible in relation to the provision of housing.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b><i>smaller settlements, development in one village may support services in a village nearby.</i></b></p> <p>The Council's approach to rule out sites which are outside of the settlement hierarchy (at stage 3 of the site selection process), without considering the site-specific benefits of such site, is inconsistent with the above paragraph of national planning policy. In particular, the final sentence above which refers to development in one village supporting services in nearby villages. In the case of our client's site at Lower Basildon, a minor development proposal for 9 dwellings within this village would support the services and vitality of the nearby settlement of Pangbourne which has numerous independent shops, cafes and restaurants.</p> <p>At paragraph 4.34 the Council acknowledges that for settlements outside of the settlement hierarchy, "<b><i>some limited development is important for the long-term sustainability of rural communities</i></b>". Given the Council's recognition of the benefits associated with this development, it appears an inconsistent approach for appropriate allocations on the edge of existing settlements not to have been considered.</p> <p>It is acknowledged that the majority of the small villages within West Berkshire will be within the AONB. On this basis, consideration of additional sites should be informed by careful consideration of landscape impacts. We also note that whilst the Landscape Character Assessment (2019) includes the whole borough, the Landscape Sensitivity Study 2009, Landscape Sensitivity Assessment (2011) and Landscape Capacity Assessments (2014 and 2015) have not included the consideration of development opportunities within smaller rural villages within the AONB and have only considered settlements within the settlement hierarchy. By excluding these sites from consideration, sites which would be acceptable in landscape terms have been overlooked. Our client's site at Lower Basildon provides an appropriate location</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>for development, on a site which is already bounded by existing residential uses with a linear layout in-keeping with the existing settlement. Our representations are accompanied by a Report on Landscape and Visual Matters prepared by David Williams Landscape Consultancy (dated October 2020) which confirms the suitability of our client's site for development from a landscape and visual perspective.</p> <p>Changes sought:</p> <p>The Council should allocate sites within smaller villages across the AONB.</p> <p>It is noted that the Council are yet to undertake settlement boundary reviews. When undertaking this work; we would encourage the Council to have regard to sites promoted for development within settlements which are not within the settlement hierarchy and utilise the settlement boundary review as an opportunity to allocate further sites for development. Given the absence of settlement specific landscape capacity work, we would encourage the Council to have regard to landscape work undertaken in relation to site promotions where this has been prepared in accordance with best-practice and undertaken by suitably qualified professionals.</p>	
Pro Vision for RivarLtd (lpr1514)	<p>Support policy.</p> <p><b>Full representation by Pro Vision on behalf of Rivar Ltd. attached.</b></p> <p>Support for allocation of land north of Southend Road, Bradfield Southend.</p>	Support for policy noted.

Respondent (with lpr ref)	Response	Council Response
Pro Vision for Trustees of Allan Snook Will Trust (lpr1915)	<p>Object to policy.</p> <p><i>Full representation on behalf of the Trustees of the Allan Snook Will Trust promoting land to the south of the Recreation Ground, Boxford is attached.</i></p> <p>The representation makes the case that the housing requirement is insufficient, the expected housing supply will lead to a significant housing shortage, the approach to smaller villages is flawed and the site to the south of the Recreation Ground, Boxford should be considered for allocation.</p>	<p>Comments noted.</p> <p>Policy SP12 of the emerging draft LPR made provision for 8,840 to 9,588 net additional dwellings (520 to 575 dwellings per annum. The target figure was 564 dwellings. The supporting text to policy SP12 identified a supply of 11,439 dwellings over the plan period.</p> <p>The NPPF expects authorities to follow the standard method to assess need, and it is considered that a housing requirement that is slightly higher than the Local Housing Need, demonstrating that the assessed need can be met, is appropriate. The use of a range to express the requirement introduces some flexibility.</p> <p>The site 'land to the south of the Recreation Ground, Boxford' has been assessed in the HELAA. The HELAA assessment of the site concludes that the site is not developable within the next 15 years, and this is because development would be inappropriate in the context of the existing settlement form and pattern. Development would also fail to conserve and enhance the AONB</p> <p>Nonetheless, Boxford is a village located outside of the settlement hierarchy and only limited appropriate development would be permitted in accordance with Policy DM1. Sites in settlements outside of the settlement hierarchy are not proposed for allocations.</p> <p>No further charges to the LPR are required.</p>
Turley Associates for A2 dominion Housing Group Ltd. (lpr1494)	<p><i>Full representations made by Turley on behalf of A2Dominion in relation to Land East of Reading Road, Streatley are attached.</i></p> <p>These representations promote land east of Reading Road, Streatley for development and set out the agent's reasons why it should be allocated to help meet West Berkshire's housing delivery over the plan period, or the need for extra care</p>	<p>Comments noted.</p> <p>The suggested site STR3 is not considered suitable for allocation in the LPR. The HELAA indicated that it was not suitable - <i>Development would result in harm to the AONB, and would also be inappropriate in the context of the existing settlement form, pattern and character of the landscape.</i> Streatley is a village located outside of the settlement hierarchy. Therefore, only limited appropriate development would be permitted in accordance with Policy DM1.</p>

Respondent (with lpr ref)	Response	Council Response
	accommodation. The land has been considered under HELAA reference STR3.	No further charges to the LPR are required.
Pegasus Planning Group Ltd. For Donnington New Homes (lpr2217)	<p><i>(comments submitted under SP15 as well)</i></p> <p>Donnington New Homes are submitting a number of representations in relation to the consultation and this letter and representation relates specifically to their land interests in Hungerford, namely sites HUN7, HUN8, HUN9 and HUN10 as labelled in the Council's HELLA.</p> <p>Policy SP2 of the Emerging Draft Local Plan deals specifically with the North Wessex Downs AONB which washes over the town of Hungerford.</p> <p>It is welcomed that the Policy states that the AONB will have <i>“appropriate and sustainable growth”</i> and that <i>“Development ... will support its local communities and rural economy ....”</i>.</p> <p>Donnington New Homes are however concerned that the second paragraph of the Policy goes onto state that <i>“Planning permission will be refused for <u>major development</u> in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest”</i> (my emphasis). The third paragraph of the Policy states that <i>“in determining what constitutes major development the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development”</i>.</p>	<p>Comments noted.</p> <p>Sites allocated as part of the plan making process, whether through the LPR or Neighbourhood Plan, will undergo a rigorous site assessment and sustainability appraisal. No changes to the policy are considered necessary</p> <p>Support noted.</p> <p>Clarification on ‘major development’ is proposed to be included in the Glossary. No other changes to Policy SP2 are proposed.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>Notwithstanding the above text within Policy SP2 Policy SP1 states that allocations for housing will be made for Hungerford through a Neighbourhood Development Plan.</p> <p>Hungerford is identified as a Rural Service Centre in Policy SP3.</p> <p>Policy SP15 allocates sites for residential development in the North Wessex Downs AONB at settlements that are not included within a Designated Neighbourhood Area. A Neighbourhood Area for the Parish of Hungerford was designated on 9th April 2018. No sites are therefore allocated for residential development in Hungerford in the Emerging Local Plan Review. Rather, Policy SP15 directs 55 new dwellings to Hungerford through the Neighbourhood Development Plan.</p> <p>Donnington New Homes welcomes the identification of a need for 55 new dwellings at Hungerford and for these to be delivered through the Neighbourhood Plan process. They are however concerned that Policy SP2 could be overly restrictive to the delivery of this requirement through its reference to <i>“planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest”</i>.</p> <p>The NPPF defines major development generally as being development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more (NPPF Glossary) except for the purposes of paragraph 172 and 173 of the NPPF which deal with AONBs where the definition of ‘major development’ is stated as being a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.</p>	<p>Support noted. Disagree that the policy is overly restrictive. No changes to the wording are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>An appeal decision (PINS ref: APP/F160/W/16/3165805) dated November 2017 for 30 dwellings in the Cotswold AONB in Chipping Camden (Cotswold District Council) considered what constitutes major development in the AONB. A copy of the decision is enclosed with this letter.</p> <p>The Inspector confirmed it was common ground that there is no definition of what constitutes “major development” (paragraph 13). He continued to acknowledge that <i>“the proposal, for 30 dwellings, using the normal meaning of the word ‘major’ is capable of amounting to major development, depending on context ... (however) ... the scale of the proposal in relation to the size of the settlement would not be major, amounting to about 2.5% of the size of the town”</i> (paragraph 13).</p> <p>At the 2011 Census the Parish of Hungerford was recorded as containing 2,756 households. The proposed Neighbourhood Plan allocation of 55 dwellings would therefore amount to about 1.99% of the size of the town.</p> <p>Furthermore, HUN7 which is being promoted by Donnington New Homes could deliver circa 31 dwellings and would therefore be consistent in scale with the development referred to in the above appeal decision which was found not to constitute major development in the Green Belt. Should HUN7 come forward for development it would also allow a further smaller site to come forward for residential development in Hungerford (i.e. such as HUN9).</p> <p>Changes sought:</p> <p>In order to provide consistency with regards to development in the AONB through the Local Plan Review it is considered necessary for Policy SP2 to make it clear that the delivery of housing required</p>	<p>HUN7 is not being progressed through the LPR.</p> <p>Disagree with proposed change as indicated above. No further amendments to Policy SP15 are proposed.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>through Neighbourhood Plans (as required by Policy SP15) would not constitute major development (in principle). As currently drafted the Policy leaves consideration as to what constitutes major development down to the decision maker (i.e. the LPA) at the time an application is made. It is therefore requested that the second paragraph of Policy SP2 is amended as follows:</p> <p><i>“Development in the North Wessex Downs AONB will support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. <u>Sites will be brought forward for residential development through Policies in the Plan and through Neighbourhood Development Plans. Such sites will not be deemed to constitute major development in the AONB.</u>”</i></p> <p>The above suggested change to Policy SP2 would ensure Policy SP15 is consistent with the wider strategy of the Local Plan Review.</p>	
Turley for Commercial Estate Group (lpr2361)	<p>Support policy</p> <p>Broadly agree.</p> <p>CEG generally supports the Council's strategic objective for housing and the approach to housing delivery in so far as it seeks to provide sufficient housing to meet identified needs whilst not curtailing the delivery of housing throughout the plan period (i.e. the housing figure is neither seen as a ceiling or a cap to development). This ensures that the plan provides flexibility and largely meets the requirements of the National Planning Policy Framework (The Framework).</p> <p>The Local Development Scheme currently envisages adoption in December 2022 but there are recent experiences where the Examination process has taken considerably longer than envisaged. Given the local plan are supposed to have a 15-year</p>	<p>Comments noted.</p> <p>The land north of Newbury site has permission, and is currently under construction. The housing number of 401 dwellings has been factored into the supply when calculating the 5 year housing land supply.</p> <p>As dwellings are under construction, with houses being actively marketed, it is not considered necessary to allocate the land for residential development. The settlement boundary would be reviewed to encompass the land, and will be consulted on as part of the consultation exercise for the submission version of the Local Plan.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>time horizon from adoption CEG consider that this emerging Local Plan should have an end date of 2038 rather than 2037 to build in some flexibility from the outset. This would require an additional year's worth of housing land to be identified, especially on the edge of sustainable settlements.</p> <p>Concern exists, however, about the Council's rigid approach to the allocation of sites for development. In particular the heavy reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandford Park and evidenced through consultant papers such as the 'Start to Finish' Report 2nd Edition prepared by Lichfields).</p> <p>In the absence of a Housing Trajectory within the documentation or Appendices CEG therefore reserve the right to make more detailed comments on the delivery and lead in time of strategic sites at a later stage.</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements to come forward in an appropriate manner. Directing such to sustainable settlements would accord with the current spatial strategy.</p> <p>One example of this is the land to the North of Newbury. Part of the land benefits from planning permission for up to 401 dwellings, a local centre and a primary school and work has commenced to implement that permission. There is the opportunity for further housing to occur which would capitalise upon these new social and community facilities.</p> <p>Additional land in this location was covered by the Environmental Statement (ES) which was submitted in support of the application but did not form part of the development scheme itself. The ES demonstrated that the additional land was suitable for future development to assist in meeting the Council's housing needs in a location which is sustainable and where there are limited</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>constraints to development.</p> <p>The Council's own assessment of the wider site within the HELAA (December 2020) stated that this site is well related to Newbury and that it should be considered as part of a future potential strategic site. The Council has accepted that the site is suitable for development and in positively preparing the plan should be considering the positive contribution that a flexible approach to additional housing in locations, such as North Newbury, can make to ensuring that the plan meets its objectives. This would align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Changes sought:</p> <p>Consideration should be given within Policies SP13 -15 to identifying additional sites to provide more flexibility for the plan to deliver the identified housing numbers (including up-to 2038), as a minimum, and to ensure that any delays to the delivery of large strategic sites does not adversely impact on the Council's ability to meet their housing needs.</p> <p>The contribution that the CEG's site at North Newbury can make, to both housing delivery and infrastructure provision (i.e. links between the A339 and B4009), should carry significant weight and means that it should be formally allocated for residential purposes. Such an allocation would accord with the spatial strategy and the available technical evidence concerning the site's suitability for development.</p> <p>For the avoidance of doubt, the extent of the proposed allocation is identified on the accompanying plan.</p>	
West Build Homes (lpr2138)	Westbuild broadly support the Council's approach to the delivery of housing set out within Policy SP12, but have some reservations about specific matters which are set out below.	<p>Comments noted.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Significant concern exists, however, about the Council’s over-reliance on two large strategic sites. The Council’s own experience, and that on a national level, is that strategic sites have lengthy lead-in times, and are inherently slow in delivery, and this should be reflected within the emerging plan review through the inclusion of criteria for sites not proposed for allocation to be considered, increasing the flexibility afforded to the Council and reducing the reliance upon strategic sites.</p> <p>Paragraph 6.10 of the draft emerging plan refers to paragraph 68 the National Planning Policy Framework (The Framework) and the weight that should be attributed to the benefits of using suitable sites within existing settlements for homes. What it fails to have any regard to, however, is the sub section <b>Paragraph 68(d)</b> which states that local planning authorities should:</p> <p><i>“work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”</i></p> <p>Westbuild contends that without reference to the part of the Framework, and the inclusion of such provisions within the proposed policies, the plan is flawed in its approach and does not fully meet the tests of soundness.</p> <p>Westbuild contends that RSA25 (land north of Southend Road, Bradfield) cannot be delivered with the vehicular access as shown, due to adverse impact on protected trees, and insufficient geometry/ width for an adopted road between the existing buildings, root protection zones and boundaries.</p> <p>Changes sought:</p> <p>Policies SP13 -15 should be amended to provide the potential for additional sites to come forward within the plan period and to</p>	<p>and a larger number of medium and smaller sites (including brownfield sites within settlement boundaries) that can deliver housing sooner.</p> <p>In reference to RSA25 the Highways Authority do not report concerns and comment that an adoptable access is achievable immediately on to Southend Road. The site promoter confirms that access is available. Policy RSA25 would ensure that the access would need to take into account the TPOs on the eastern boundary.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>ensure that any delays to the delivery of the large strategic sites is mitigated.</p> <p>Site RSA25 should be removed from SP15.</p>	
<p>Carter Planning Ltd for R L A Jones (lpr1902)</p>	<p>Object to policy.</p> <p>Policy SP15 should be amended to delete RSA22 Lynch Lane and RSA23 Newbury Road, Lambourn. The Section is entitled “Delivering Housing”. Despite being allocated in April 2017 there is no sign of either site coming forward with no planning applications being made in respect of Lynch Lane and planning permission having already been refused for Newbury Road.</p> <p>Policy RSA 22 (HSA 20 Site LAM005) Lynch Lane, Lambourn Our Clients have made representations elsewhere that the housing provision in the Plan is inadequate and extra sites should be included, in particular Site LAM007.</p> <p>However if the Inspector considers that extra sites are not required then SHLAA site LAM007 should be included instead of sites RSA22 (HSA20) or more particularly RSA 23 (HSA21 (or LAM015)), in the Draft document.</p> <p>RSA 22 has the disadvantage of being a very large site for the village to accommodate. The capacity of the site has risen arbitrarily since the 2014 Preferred Options document and yet the constraints have increased. It lies alongside an SSI/SAC and part of the site is liable to flooding from the River Lambourn which flows along the northern boundary. No work seems to have been carried out on a number of aspects including archaeology. It appears that the site capacity has arbitrarily increased by 4 units from 56 in the 2014 document to 60 in the adopted document merely so that, together with new site RSA 23 (LAM015), it tries to compensate for the unjustified omission in this version of the Draft Plan of site LAM007 which was previously included.</p> <p>The previous Summary of Lambourn Sites SA/SEA page 122 notes the negative points in relation to environmental sustainability and</p>	<p>Comments noted.</p> <p>Please see responses to Policies RSA22 and RSA23 (lpr1904 and lpr1905).</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p> <p>The site LAM1 (previously LAM007) was promoted as part of the HELAA which concluded the site was ‘potentially developable in part’. Development of the lower eastern sections of the site would not harm the natural beauty of the AONB and would relate to the existing settlement pattern.</p> <p>Following the publication of the HELAA in February 2019 and the update in December 2020, further evidence for the LPR has been produced. The Level 2 Strategic Flood Risk Assessment (SFRA) published in December 2021 indicates that part of the site is at risk from groundwater emergence during a 1 in 100 year flood event. The Level 2 SFRA mentions that whilst there weren’t any reported incidences of groundwater flooding on the site during the 2013/14 flood event, this might have been because the site is grassland rather than a habited property so wasn’t reported. Groundwater emergence modelling indicates that part of the site was affected. The revised NPPF published in July 2021 now places emphases on considering “...<i>flood risk from all sources and the current and future impacts of climate change...</i>” (para 160). The NPPF is clear at para 159 that</p>

Respondent (with lpr ref)	Response	Council Response
	<p>flooding. The need for a buffer zone and the inability to develop within the flood zone appear to reduce the size and capacity of the site and not to increase it as is arbitrarily suggested (from 56 to 60) in the adopted Plan.</p> <p>The Parish Council within their response with regard to RSA 22 (LAM005) included the following key points:-</p> <p>"Environment -the site is within the AONB. The site is immediately adjacent to the River Lambourn, the corridor of which is a Site of Special Scientific Interest.</p> <p>Housing and the Community – Lambourn needs a period of consolidation to adjust to the social impact resulting from recent rapid growth.</p> <p>Industry – impact on the racehorse industry– safety of horses and riders will be affected by increased traffic generation</p> <p>Archaeology – Lambourn formed part of the parkland of Lambourn Place, and the site is believed to be a site of a Saxon palace. Any development would destroy this.</p> <p>Roads – roads are narrow, with blind bends and dangerous junctions. Inadequate footpaths and the roads are busy. Any increase in traffic will be detrimental to the safety of the road users". These matters do not appear to have been addressed.</p> <p>The previous Lambourn Site Assessments document, in its summary notes that "the Parish Council had various concerns about this site, as does the local community". Indeed this was the least favoured site for development by the residents responding to the survey.</p> <p>The Plan,s approach to the selection of sites is not justified.</p> <p>Policy RSA 23 (HSA 21 Site LAM015) Newbury Road Lambourn Policy RSA 23 should be deleted and replaced by previously preferred Option Site LAM007. RSA 23 (HSA21 or LAM015) is a very small, inflexible site and makes little contribution to housing supply (five dwellings). It appears to have been included (and the notional capacity of</p>	<p><i>"...inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)."</i></p> <p>Lambourn Parish Council are preparing a neighbourhood plan and the Neighbourhood Area was designated in December 2018 and covers the whole of the Parish. It is the intention of the Parish Council to include allocations for residential development in the plan. It is therefore not proposed to include any new allocations in Lambourn in the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>LAM005 increased) merely so that LAM007, previously included as being acceptable, could be excluded.</p> <p>RSA 23 (HSA21 or LAM015) was not examined in the West Berks Landscape Sensitivity Assessment by Kirkham Landscape Planning.</p> <p>The reference to the site in The Lambourn Site Assessment was both cursory and inadequate. The Parish Council were not consulted (apparently it appears neither were statutory consultees). RSA 23 scores poorly when compared against the landscape criteria previously used. It forms an extension of the existing settlement boundary.</p> <p>RSA 23 (LAM015) was included in the adopted Plan at a late stage and yet has no identifiable feature to create its northern boundary which is open and on a ridge. There is no landscaped boundary. It is on a ridge and can be described as an open area on the edge of the settlement seen at the entrance to the village. It also lies close to the Medieval Village of Bockhampton.</p> <p>All these matters are causing difficulty with a current planning application for eight dwellings.</p> <p>The RSA Policies should include site LAM007 “Land between Folly Road, Rockfel Road and Stork House Drive” instead of RSA 23.</p> <p>The Draft Plans approach to the selection of sites and the review of settlement boundaries is not justified or sound.</p> <p>In other representations we found much of Policy SP 1 is unobjectionable and can be supported but objection was raised to the very last sentence. “Allocations for housing for Hungerford, Lambourn, Compton and Hermitage will be made through Neighbourhood Development Plans”. This problem is exacerbated in Paragraph 6.14 which proposes that 315 dwellings will be provided through Neighbourhood Plans. That is an abrogation of the function of this Draft Plan. Neighbourhood Plans should not be making housing allocations, that is a function of the Draft Plan, and indeed some such sites coming forward may cut across the Draft Plan. Furthermore Policy SP15 suggest that the Lambourn</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Neighbourhood Plan should provide 25 dwellings in addition to the sites already included in the Draft Plan (and which we suggest may not come forward).</p> <p>Indeed if the task of allocating housing sites is left to Neighbourhood Plans , especially in Lambourn, either that Plan may not come forward or, more likely, local residents will not want additional housing in their locality leaving the housing needs/requirement unsatisfied.</p> <p>Changes sought:</p> <p>Policy SP15 should include the SHLAA site known as LAM007 “Land between Folly Road, Rockfel Road and Stork House Drive” instead of RSA22 and RSA23.</p> <p>The Plan’s approach to the selection of sites is not justified or consistent with previous Plans. Further the detailed examination of Site RSA 22 means that it may not be delivered or may only delivered with reduced capacity. Our Clients would prefer that Site RSA 22 is omitted.</p> <p>Site RSA23 should be omitted. It has been refused planning permission and did not originally go through the rigorous consultation process or selection procedure applied to other sites such as LAM007. Its impact on the landscape was not been adequately assessed. It is further from services than LAM007 and has a number of other disadvantages.</p> <p>The inclusion of RSA23 would undermine the Plan and would mean that it is both unsound and ineffective.</p> <p>The reliance on allocations through the Neighbourhood Plan process raises questions as to whether the objectively assessed needs will be met within the plan period increasing pressures on other settlements to meet the unmet need.</p> <p>The Council should allocate all housing sites through this Draft Plan and do not leave the task to Neighbourhood Plans. Amend or delete Paragraph 6.14 and Policy SP15 “Total designated by</p>	



Respondent (with lpr ref)	Response	Council Response
	Neighbourhood Area” to delete the 100 dwellings therein and replace them with allocated sites one of which could be our Clients site “Land between Folly Road, Rockfel Road and Stork House Drive (SHLAA site reference LAM007)”.	
Pro vision for CALA Group Ltd (lpr2414)	<p><i>In context of two sites: East and West of Salisbury Road, Hungerford. Full representations attached</i></p> <p>Supporting text explains that, in the AONB, “<b>development will be modest</b>, helping to meet local needs, support the rural economy and sustain local facilities in accordance with Policy SP2” (our emphasis).</p> <p>For Hungerford, this has translated into a proposed requirement for 55 homes over the plan period. Exactly how that figure has been calculated is not clear i.e. is it a proportion of the overall growth directed to the AONB, and if so how has that proportion been justified?</p> <p>Even taking into account the assertion that needs to 2026 have been met through existing allocations, this equates to an annualised requirement of 5 dwellings for the town (taking the whole plan period, it would be even less, at 3.2 per year). In the context of an annual need across the district of 513 dwellings, this represents less than 1% of the district’s housing target.</p> <p>With a proposed allocation of 500 homes altogether in the AONB over the plan period (17 years, 2020 to 2037), including the existing</p>	<p>In determining the housing requirements for the designated neighbourhood areas, consideration has been given to the development opportunities in the HELAA, as well as the settlement hierarchy.</p> <p>The Parish of Hungerford contains the town of Hungerford and the small settlement of Eddington. Hungerford is identified as a Rural Service Centre in the settlement hierarchy. Rural Service Centres have a range of services and reasonable public transport provision meaning there are opportunities to strengthen the role in meeting the requirements of surrounding communities. Eddington is not included within the settlement hierarchy and is instead a ‘smaller village with a settlement boundaries’ therefore only suitable for limited infill development subject to the character and form of the settlement.</p> <p>Hungerford sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There is one site allocated for 100 dwellings in the HSA DPD, and development is close to completion.</p> <p>The February 2020 HELAA identified 8 sites as having potential, and this remained the same in the December 2020 update of the HELAA. Taking the development potential of these sites into consideration alongside the placing of Hungerford within the settlement hierarchy as</p>

Respondent (with lpr ref)	Response	Council Response
	<p>allocations in the Housing Sites Allocations DPD, only around 5% of growth is be directed to this spatial area, an area which comprises three quarters of the district.</p> <p>In the context of the AONB spatial area, if including the HSA18 allocation (Land East of Salisbury Road, Hungerford), a total of 155 homes are allocated to Hungerford over the plan period. This represents 31% of the AONB apportionment.</p> <p>As the only town in the AONB (within the district), with its very good accessibility, including main line rail station, there is a case that a much greater proportion of the growth should be directed to the town to promote sustainable development, including reducing the need to travel. The evidence base underpins this point, noting that the town “is the most sustainable rural service centre” and that it “performs a significant role for a large catchment area”. And Hungerford is the only settlement in the AONB to have a designated ‘Town Centre’.</p> <p>We also note that this catchment is cross-boundary, given the proximity to Wiltshire, and address this in comments on the Duty to Cooperate below.</p> <p>Looking beyond 2026, and discounting the already committed HSA site allocations, the apportionment to Hungerford (55 homes) is still only around a third (34%).</p>	<p>well as the AONB, officers consider that a housing requirement of 55 dwellings would be appropriate.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Therefore, the draft spatial strategy is proposing not “modest”, but very modest growth, especially for main settlement in the AONB</p> <p>And this is in the context of a spatial strategy that is relying very heavily on two strategic allocations - Sandford Park (Draft Policy SP16) and North East Thatcham (draft Policy SP17). Both of which rely on significant infrastructure requirements, and will take significant time to come forward, and in the case of Sandford, have already failed to get planning permission previously for various, complicated technical reasons. While it is appropriate that the main focus of development is outside of the AONB, the extent of constraint in favour of reliance of such allocations outside the designated landscape is not supported as it is unlikely to be the most overall sustainable approach, when taking into account all three strands of sustainable development (social, economic and environmental). Noting this proposed policy approach, which appears to be inconsistent with the settlement hierarchy and we consider is not the most sustainable approach overall, it is therefore relevant to scrutinise the evidence of local need in the town, which we cover in the next section.</p> <p>Finally, in respect of the proposed spatial strategy, while we reiterate our support for the HNP process in identifying suitable sites for development, we also support the evidence base that states that, in the event that the HNP stalls (for example, fails referendum), the District Council will “pick up the site selection work and consider allocations through the LPR”.</p> <p>It is important that the LPR draft policies reflect that important point (draft Policy SP15 currently does not). However, it would also be important to recognise in the evidence</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>base, and the draft policies, that significant work has been undertaken by the Town Council, assisted by land promoters including CALA, to assess available sites. This local evidence should be the starting point if allocations are necessary through the LPR in due course.</p> <p><b>Need in Hungerford</b></p> <p>A report into development need was published in 2019 by Aecom to inform the HNP. It is reported that the Housing Needs Figure (HNF) for Hungerford is 27 net additional dwellings per year, equating to a total of 486 over the Plan period 2018 to 2036. Further, it is reported that “There is a <b>severe lack</b> of suitably affordable houses for the population of Hungerford, and <b>every effort</b> should be made to maximise AH provision going forward....” (Our emphasis).</p> <p>The Aecom report goes on to note that the HNF is an “upper-bound target that is subject to supply of suitable sites”<sup>13</sup> i.e. that supply of suitable land will be a significant factor in what is a realistic housing target for the settlement. CALA has been cooperating with the HNP process to allow for detailed assessments of available sites.</p> <p>The requirement proposed in draft Policy SP15 is 55 dwellings. That is some 431 fewer than the settlement specific assessment of need. In other words, the proposed requirement for the HNP, if adopted, is just 11% of specific need identified for the town.</p> <p>Even including the 100 homes allocated (and now being delivered) under HSA18, the shortfall is substantial at 331 homes (i.e. providing for only 32% of need).</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>It is not clear in the evidence if site availability has been a factor in the proposed housing requirement, or whether it is a top-down figure based on a proposed spatial strategy of very significant constraint to development in the AONB over the plan period.</p> <p>It would certainly be appropriate, indeed essential, for the requirement to be tested against the realistic site capacity in the town, which the HNP process is in the process of doing.</p> <p>As it stands, unless there was clear evidence that capacity was so constrained that no more than around 55 homes could be achieved, the proposed LPR will make a significant contribution to worsening housing need.</p> <p>The implication of such a policy approach is likely to be new households, for example, new families, having to leave the town, with implications for the social fabric and sustainability of the community.</p> <p>And there is evidence to strongly indicate that there is significantly greater capacity in and immediately around the town. Sites HUN12 and HUN14, for example could potentially deliver in the order of 150 homes immediately adjacent to the current settlement boundary (which is due to be reviewed in any case before the next draft of the LPR).</p> <p>Initial assessment of the sites for the HNP, and in parallel through the HELAA, has raised no insurmountable constraints to development, albeit both sites, but HUN12 (West of Salisbury Road) in particular, would require careful, landscape led master planning to mitigate impacts in the landscape. The site assessment recognises that specific landscape assessment is required to fully test the site capacities.</p> <p><b>Duty to cooperate</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>If there is indeed unmet need from neighbouring authorities, the strategy of such a high degree of constraint in the AONB is further undermined (in addition to the impact on not meeting needs arising from within the district itself).</p> <p>Turning to Hungerford specifically, as noted above, the town is relatively close to the district boundary with Wiltshire. Given the “large catchment” identified in the evidence base, the cross-boundary relationship should be factored into the spatial strategy and evidence base (including the forthcoming Duty to Cooperate Statement), which inevitably influences the future development needs. The influence of this geography is recognised in the assessment of housing need by Aecom.</p> <p><b>Sustainability Appraisal</b></p> <p>In terms of draft Policy SP15 (allocations in the AONB, it is also given a positive assessment, albeit, not as significantly positive, against SA1.</p> <p>While the policy may well score highly in other respects, it does not in terms of SA1, and so the assessment should be thoroughly reviewed in this respect if it is to stand-up to scrutiny.</p> <p>The SA may even underplay how draft Policy SP2 and SP15 actually positively help to protect the AONB from development (for example, when assessed against SA5 – Natural, built and historic environment), again indicating a review of the assessment would be appropriate.</p>	
Sovereign Housing Association (lpr2187)	<p>Support policy.</p> <p>Both the landowners and Sovereign support the identification within Policy SP 15 as well as the supporting text within paragraph 6.23 of the identification of the land adjacent to The Haven, Kintbury as a development site to come forward within the North Wessex</p>	Support noted. No further changes to the LPR are proposed.

Respondent (with lpr ref)	Response	Council Response
	Downs, where we can guarantee the delivery of the site. We fully support the special characteristics of the North Wessex Downs AONB, and that development will help support not only local needs, but also help to sustain local facilities and provide much needed housing in those villages which are capable of accommodating growth.	
Bell Cornwell LLP for Friday Street Developments Ltd (lpr2360)	<p><i>Representation promoting the allocation of land at Ash Grove, Bradfield Southend attached.</i></p> <p>Representation raises concerns about the assessment of the site, particularly with regard to landscape and the assessment of the full site area when agent has previously made clear that an allocation smaller than the whole site area would be acceptable.</p>	<p>Comments noted.</p> <p>The site was previously ruled out based on landscape advice. If Stretton Close was to remain undeveloped the site would be poorly connected to the rest of the settlement. Now that the site at Stretton Close (RSA24) has been allocated, and outline and reserved matters permission granted, RSA25 would be read alongside this site. The AONB Board comment the site would be a logical extension. Appropriate landscaping would be required in the site specific criteria.</p>
Donnington New Homes (lpr2063)	<p>Donnington New Homes are promoting land at Kiln Farm, west of B4009 and north of Hermitage Primary School and referenced within the HELAA as HER5.</p> <p>The site is approximately 5.8 Hectares (14.33 Acres) and based on the Concept Land Use Plan submitted with our call for sites submission package dated 29th September 2019, could accommodate approximately 110 dwellings.</p> <p>We welcome that the Policy states that the AONB will have “appropriate and sustainable growth” and that “Development ... will support its local communities and rural economy ....”.</p> <p>We are concerned that the second paragraph of the Policy goes onto state that “<i>Planning permission will be refused for <u>major development</u> in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest</i>” (my emphasis). The third paragraph of the Policy states that “<i>in determining what constitutes major development the Council will</i></p>	<p>The promoted site (Kiln Farm, west of B4009, and referenced within the HEELA as HER5) will not be allocated with the LPR and included in Policy SP15.</p> <p>The HEELA assessment indicated that: <i>The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable for the defined use within the next 15 years.</i></p> <p>There is no further evidence before West Berkshire Council that would reverse the decision within the HEELA to exclude this site.</p> <p>The Council was informed in February 2022 that the Hermitage NDP will no longer be allocating housing sites and so the Council will be considering if there are appropriate opportunities for development as part of the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development</i>".</p> <p>Policy SP1 states that allocations for housing will be made for Hermitage through a Neighbourhood Development Plan.</p> <p>Policy SP15 goes on to allocate sites for residential development in the North Wessex Downs AONB, to settlements that are not registered as Designated Neighbourhood Areas.</p> <p>A Neighbourhood Area for the Parish of Hermitage was designated on 26th April 2019. As a result, no sites are allocated for residential development at Hermitage in the LPR and instead, Policy SP15 directs 20 new dwellings to Hermitage through the Neighbourhood Development Plan.</p> <p>We <u>support</u> the decision to <i>identify</i> the need for 20 new dwellings at Hermitage, to be delivered through the Neighbourhood Plan process.</p> <p>Changes sought:</p> <p>In order to provide consistency with regards to development in the AONB through the Local Plan Review it's considered necessary for Policy SP2 to make it clear that the delivery of housing required through Neighbourhood Plans (as required by Policy SP15) would not constitute major development (in principle). As currently drafted the Policy leaves consideration as to what constitutes major</p>	<p>Support noted.</p> <p>Clarification is being sought on what constitutes 'major development' insofar as it cross refers to Policy SP2. Please refer to responses to comments in relation to SP2.</p> <p>The references to the Hermitage neighbourhood plan areas is proposed to be assigned a zero allocation.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>development down to the decision maker (i.e. the LPA) at the time an application is made. It is therefore requested that the second paragraph of Policy SP2 is amended as follows:</p> <p><i><u>“Development in the North Wessex Downs AONB will support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. Sites will be brought forward for residential development through Policies in the Plan and through Neighbourhood Development Plans. Such sites will not be deemed to constitute major development in the AONB. Planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest”.</u></i> (proposed new text is underlined).</p> <p>The above suggested change to Policy SP2 would ensure Policy SP15 is consistent with the wider strategy of the Local Plan Review.</p> <p>We have taken the opportunity to prepare a revised concept plan, to deliver a scheme of a suitable form and scale that accords with the Hermitage NDP 20 dwelling requirement.</p> <p>We have written to the Hermitage NDP group on this basis and we enclose the correspondence and enclosures. This information should be used for any future HELAA updates.</p> <p>Please note that the original site area submitted to West Berkshire</p>	<p>Disagree. Refer to the council’s response to SP15. No further changes are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	Council 29th September 2019, referenced within the HELAA as HER5, remains valid for any future HELAA assessment.	
Gerald Eve for Fairhurst Estate (lpr2373)	<p>Object to policy.</p> <p>Our client owns and controls land situated to the East of Shaw Farm Road, Newbury. A site location plan of this land is included at Annex 1 (<i>attached</i>). The land would be accessed from the roundabout adjacent to the Vodafone Headquarters as an extension to the already permitted housing development, and would not rely upon vehicular access from Shaw Farm Road/Love Lane itself.</p> <p>We share the concerns of others in respect of the approach to the identification and allocation of sites for development. In particular the heavy reliance on strategic sites has the potential to delay the delivery of much needed housing, given that strategic sites are inherently slow to deliver (as witnessed with the Council's Core Strategy allocation at Sandleford Park and evidenced through background papers such as the 'Start to Finish' Report prepared by Lichfields).</p> <p>In order to provide additional flexibility and ensure that the Council does not find itself in a position of not having an up to date five year housing land supply, consideration should be given to providing additional flexibility within the plan by setting criteria for sites on the</p>	<p>Noted.</p> <p>Disagree. As at 31 March 2021, the 5 year housing land supply was 7.3 years. The council does not consider it necessary to give additional flexibility within the plan by setting criteria for sites on the edges of sustainable settlements. This approach would undermine the strategy of the plan and would not be in accordance with the evidence base to support the LPR, including the HEELA.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>edges of sustainable settlements to come forward in an appropriate manner.</p> <p>The Council's own assessment (within the HELAA (December 2020) of the wider area, within which the land is situated, stated that it is well related to Newbury and that it should be considered as part of a future potential strategic site (site reference SCD4). The Council has accepted the principle that the general location is suitable for development and, in positively preparing the plan, should be considering the positive contribution that a flexible approach to additional housing in locations such as this can make to ensuring that the plan meets its objectives. This would align with paragraph 16 (b) and the tests of soundness set out in the Framework.</p> <p>Changes sought:</p> <p>Further consideration of the whole site assessed as SCD4 within the HELAA should be undertaken. The site, as shown within SCD4, and specifically including the area as identified on the enclosed plan, merits further investigation and consideration for inclusion as a suitable site for the delivery of additional new homes.</p>	<p>No changes to the LPR are proposed.</p> <p>Disagree. Site SCD4 (Land to the north of Newbury, Newbury) was discounted in the Emerging Draft West Berkshire Local Plan Review to 2037 Site Selection Background Paper. The site should come forward for consideration for a future review of the Local Plan. The document indicated that <i>“The site is fairly well related to Newbury with its comprehensive range of services and facilities. Overall the site is likely to have a neutral effect on sustainability and the SA/SEA does not highlight any significant sustainability effects. Issues which would need to be resolved relate particularly to highways and access and further information would be required on ecology, heritage and landscape. As the site is at risk of surface water flooding attenuation measures would need to be incorporated into any development. Development would need to be avoided in the areas at risk. Development of this site should be considered as part of a future potential strategic site to the north of Newbury in order to ensure the most sustainable outcomes. Development would require access from the B4009 to the A339. A further strategic site at Newbury would be a consideration for a future review of the Local Plan.”</i></p> <p>No further amendments to the LPR are proposed.</p>
Armstrong Rigg Planning for Manor Oak Homes Ltd (lpr2424)	<p>Object to policy.</p> <p>Manor Oak Homes objects to Policy SP 15 as it will fail to meet the development needs of Lambourn. Our clients concern with the policy are threefold. Firstly, it proposes to reallocate two sites in Lambourn that have so far failed to deliver the growth needed. Secondly, the associated policies for these reallocated sites will fail to deliver the size, type and tenure of housing most needed in the</p>	<p>Comments noted.</p> <p>Please see responses to Policies RSA22 and RSA23 (lpr2423 and lpr2422).</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which</p>

Respondent (with lpr ref)	Response	Council Response
	<p>village. Finally, it relies on the emerging Lambourn Neighbourhood Plan to allocate sites for development despite clear indications that the Parish Council has no intention of doing so. In this respect, there is a clear need to allocate additional site/s in Lambourn to meet the needs of the village and are pleased to set out below how our client's site could be delivered to help meet these needs.</p> <p><b>Reallocation of Existing Sites</b></p> <p>The emerging LPR proposes to reallocate two sites for residential development that are existing allocations in the Housing Site Allocations Development Plan Document (May 2017). Manor Oak Homes does not in principle to the reallocation these sites, but any decision in this regard must be based on a thorough re-assessment of their appropriateness and deliverability: (see <i>reps on RSA23 and RSA22</i>)</p> <p><b>Failure to Deliver Size, Type and Tenure of Dwellings Needed</b></p> <p>As set out above, our client has significant concerns regarding the deliverability of the existing allocations in Lambourn and significantly their viability with respect to delivering the most pressing needs of the village in terms of small social rent dwellings tailored specifically to meet the needs of the racehorse industry.</p> <p>As set out in more detail below, our client has met with Lambourn Parish Council on two occasions to discuss their proposals for the site and during each meeting members have stressed that the key housing need in the village is for social rent dwellings that are tailored in terms of their size and type to meet the needs of younger people working in low paid jobs in the racehorse industry.</p> <p>To understand this need in more detail, our client is currently consulting with Racing Welfare as to the possibility of racing related</p>	<p>forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p> <p>These comments relate to the HELAA site LAM7. This site was assessed in the HELAA as not developable within the next 15 years. The site was found to be unsuitable because an appropriate access cannot be provided.</p> <p>Regarding the NDP, as at October 2022 the NDP steering group were undertaking site selection work with the intention of including residential allocations in the plan.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>affordable housing forming part of the proposed scheme. Racing Welfare is a charity supporting current and retired people from the horseracing and thoroughbred breeding community. They operate a Regional Welfare Office in Lambourn and also provide properties in the village through their housing association Racing Homes.</p> <p>Racing Welfare has confirmed that there is a distinct need in Lambourn for social housing to meet the needs of the racing community and that our client's site is considered to be a suitable location to provide housing designed to meet this need. The charity has also directed our client to the findings of their 2016 housing needs survey across the racing industry. A report on the findings of this survey is contained at Enclosure 6 which provides the following summary:</p> <p><i>“The research showed that housing is least affordable for singles, particularly young singles, and lone parents (although there are relatively few in the industry). The greatest proportions of households finding housing unaffordable are in Epsom, followed by Lambourn, then Newmarket and the South West.</i></p> <p><i>The study identified a need for short-term temporary housing for newcomers to a racing centre. This would be particularly useful for young singles.</i></p> <p><i>There is a lack of suitable shared housing for singles. The report suggested a hostel unit with both private and communal space is most suitable. The hostel accommodation at a training yard in Lambourn was cited as a successful example and highly regarded. This provides individual front doors, en-suite bedrooms and also some communal areas. This type of accommodation could help to manage some of the difficulties identified with shared housing.”</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Further evidence on the desperate need for affordable housing delivery in the wider AONB area is contained in Council's Updated Housing Needs Evidence report (May 2020) prepared by Icen. This report identifies the following net affordable housing needs in the District during the plan period and demonstrates that the highest annual need is from within the AONB. <i>(table in full representation)</i> This spatial area has by far the lowest level of proposed housing delivery in the emerging LPR and it is therefore critical that each and every housing proposed housing allocation is judged on how it can help deliver affordable homes to meet local needs.</p> <p>As set out in more detail below, our client's proposals, while not proposing an affordable housing exception site, have been specifically designed to meet the needs of the racing industry which would provide a significant benefit to the community in delivering the affordable housing most critically needed in Lambourn.</p> <p><b>Reliance on Lambourn Neighbourhood Plan</b></p> <p>In our two meetings with Lambourn Parish Council to discuss our client's emerging proposals they have stated firmly that they are not proposing to allocate sites through the emerging Lambourn Neighbourhood Plan. In our first meeting on 12th October 2020, the emerging LPR had not been published, such that at this stage there was no emerging LPR policy requiring them to allocate sites for housing. Our second meeting, however, took place on 19th January 2021 after the publication of the emerging LPR. At this meeting we discussed the emerging Local Plan requirement for Lambourn Neighbourhood Plan to allocate site/s for 25 dwellings and we were advised that the Parish Council had had discussions with West Berkshire's planning policy team who told them that this requirement could be met through windfall sites during the plan period. We naturally followed this point up with policy officers at the Council who advised that this was the not the case and that they expected that the Neighbourhood Plan would allocate site/s for</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>development. We are not sure what has led to this confusion regarding the requirement for Lambourn Neighbourhood Plan to allocate site/s for 25 dwellings, but it is clear that the Parish Council has no intention of doing so.</p> <p>Changes sought:</p> <p>We have demonstrated above that there is a clear and pressing need for social rented affordable dwellings in Lambourn to meet the needs of the horseracing community. This need can only realistically be met through affordable housing contributions delivered on market housing sites and it is therefore critical, given the limited capacity of the AONB to accommodate housing growth, that development that does come forwards in Lambourn is specifically tailored to meeting these needs. We have significant concerns regarding the deliverability of the current allocations in Lambourn and more specifically their viability with respect to delivering the mix of housing most needed. It is also clear that the Lambourn Neighbourhood Plan has no intention of allocating site/s for housing. We therefore recommend that a comprehensive review of housing allocations in Lambourn is undertaken to enable fresh decision taking at a Local Plan level to choose the most suitable, sustainable and deliverable housing sites to the identified need for 90 new dwellings in the village (i.e. the total of existing and proposed allocations. In this context, we set out below our client's proposals for Land at Fairview, Greenways, Lambourn. <i>(see full reps)</i></p> <p><b>Development Options in Lambourn</b></p> <p>Lambourn's location within the North Wessex Down's AONB constrains the potential development options available to meet the village's significant needs. We recognise in this respect that no site is perfect and that choosing the most suitable location for housing</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>is a balance between the various constraints to development and the ability of the site proposed to deliver the size, type and tenure of housing most needed. In this context, we set out below an assessment of the sites available for allocation (see full representation).</p>	
<p>Turley for Richborough Estates Ltd (lpr2386)</p>	<p>Full Representation promoting allocation of land north of Silchester Road, Tadley is attached at Policy SP14.</p> <p>Draft Policy SP15 outlines the sites proposed for residential development within the North Wessex Downs AONB. Richborough Estates Ltd do not support this Policy as it is considered that allocating major residential sites in the AONB conflicts with the purposes of AONB designations, as well as conflicting with Strategic Objective 8 of the Draft Plan which outlines that the Council will continue to conserve and enhance the North Wessex Downs AONB.</p> <p>This approach is also not in compliance with the NPPF where it is outlined that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. This view is even more prevalent in the recent Planning White</p>	<p>Refer to Council's response to SP14</p> <p>The sites referred to as land north of Silchester Road, Tadley will not be included as housing allocations in the LPR under Policy SP15. The allocation of the proposed site is not in accordance with the findings of the evidence base including the HEELA. Moreover, the site lies within the DEPZ of Aldermaston AWE, and therefore housing development would be resisted.</p> <p>Disagree. Refer to the Council's response to SP14.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Paper where the protection of places of environmental value, such as AONB's, will be at the forefront of future planning decisions.</p> <p>Richborough Estates Ltd suggest that the wording of this policy should restrict the level of development permitted in the AONB in order to avoid overdevelopment. This should include only allowing smaller scale developments which are design and landscape led to ensure there is little to no impact on the setting of the AONB.</p> <p>It is therefore considered that the six large sites listed in Policy SP15 should be removed. To replace these housing allocations Richborough Estates Ltd would encourage the allocation of Land North of Silchester Road, Tadley within Policy SP14, as this site is not located in the AONB.</p> <p>Changes sought:</p> <p>Considered that the six large sites listed in Policy SP15 should be removed. To replace these housing allocations Richborough Estates Ltd would encourage the allocation of Land North of Silchester Road, Tadley within Policy SP14, as this site is not located in the AONB.</p>	<p>RSA21 (land east of Salisbury Road) site will be removed as an allocation as planning permission nearly fully implemented.</p> <p>Disagree that all of the larger sites need to be deleted in favour of the objector's promoted site. The proposed allocation of the sites are in accordance with the LPR evidence base including the findings set out in the HEELA. There is a particularly extensive evidence for the site at the Pirbright Institute, including a Supplementary Planning Document to guide the development.</p> <p>No further changes to the LPR are proposed.</p>
Turley for Pangbourne College (lpr2351)	<p>The Council should take a proactive approach to including sites within the parish of Pangbourne in recognition of its status within the settlement hierarchy and to ensure that the needs of this part of the District are met. A thorough and comprehensive review of sites submitted to the HELAA should be undertaken, alongside engagement with stakeholders to review the assumptions currently made and establish if any of those sites are in fact suitable for development, as set out below.</p> <p>The land known as Centenary Fields (identified as site PAN3) was</p>	<p>Comments noted.</p> <p>Sites referred to as PAN3 (Centenary Fields); PAN4 (Bowden Fields); and the site referred to as The Boathouse will not be included as housing allocations in the LPR under Policy SP15. The allocation of the proposed sites are not in accordance with the findings of the evidence base including the HEELA.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>ruled out in stage 1 of the Council's assessment as it would result in harm to the natural beauty and special qualities of the AONB. This should be explored further as the information submitted at the previous Reg. 18 stage included landscape and visual assessment work which concluded that the site was sheltered from any views given the topography of the site and the boundary trees (which would be retained in any future development).</p> <p>Bowden Fields (PAN4) was ruled out for countryside and AONB reasons but it is also stated that an adoptable access cannot be achieved. We would question the origins of this statement and any testing work that has been undertaken. Pangbourne College's landholding runs to every boundary of that site, all of which abut existing highways. There is no evidence that an adoptable access cannot be achieved, quite to the contrary the work undertaken by the College shows that there are a number of options.</p> <p>The College's Boathouse itself lies within the existing settlement boundary, with half of the boat yard situated outside. The College has consistently promoted and sought an amendment to the settlement boundary to bring the whole of the site into the settlement. This could potentially facilitate the redevelopment of the facilities to provide a modern boat house alongside a small scale housing development.</p>	<p>PAN3 and PAN4 are not in sustainable locations, and are likely to have an adverse impact on the AONB, as demonstrated in the comments provided by the AONB Board. An adoptable access with appropriate visibility splays may not be possible on PAN4. There is nothing further in the representation to suggest that such issues could be overcome.</p> <p>PAN5 (The Boathouse) is within an area of Flood Risk (Flood Zones 2 and 3). Residential development is more vulnerable. There are sequentially preferable sites which have been proposed for allocation.</p> <p>No further changes proposed.</p>
Fowler Architecture & Planning Ltd (lpr2213)	<p>Object to policy.</p> <p>Policy SP15, as drafted, states that residential development in Hungerford, as a designated Neighbourhood Area for the purposes of Neighbourhood Planning, will be brought forward through the Neighbourhood Plan process.</p> <p>The neighbourhood planning process is required to allocate sites for only 55 dwellings at Hungerford across the plan period. The Representors argue that this number is not sufficient for a significant urban area. Hungerford is a highly sustainable settlement that can comfortably accommodate significantly more than this number across the plan period.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Tilehurst is to identify sites for 175 homes as part of the same process. Hungerford's population currently sits at 39% of that of Tilehurst – this is not reflected in this housing provision. The Hungerford Housing Needs Assessment carried out by AECOM in 2019 suggested that Hungerford's housing need figure was 27 new dwellings per annum. Hungerford was the highest scoring settlement in the Council's Audit and Settlement scores – it is a highly sustainable town, and the only Rural Service Centre to have a Town Centre as correctly designated in Policy SP20, that is clearly capable of accommodating more than 55 new homes across the plan period. Not only does the town have this capacity, its need is significantly greater than that proposed. On this basis we find Policy SP15 to be unsound, and the West Berkshire Local Plan Review (as drafted) to be unsound as a result.</p>	
Onnalee Cubitt (lpr2191)	<p>Support policy.</p> <p>Both the landowners and Sovereign support the identification within Policy SP 15 as well as the supporting text within paragraph 6.23 of the identification of the land adjacent to The Haven, Kintbury as a development site to come forward within the North Wessex Downs, where we can guarantee the delivery of the site. We fully support the special characteristics of the North Wessex Downs AONB, and that development will help support not only local needs, but also help to sustain local facilities and provide much needed housing in those villages which are capable of accommodating growth.</p>	<p>Policy support noted.</p> <p>The site referred to in the representation is RSA31: Land adjacent to the Haven, Kintbury. The site remains to be allocated in the LPR under Policy SP15 with a number of changes (please refer to comments under RSA31).</p> <p>No further changes to the LPR are proposed.</p>
Carter Jonas for Mr and Mrs Steljes (lpr1938)	<p>Object to policy.</p> <p>We object to the Section 8 of the Local Plan as it does not allocate the land at Hillfield, Lower Basildon for residential development.</p>	<p>Disagree. The promoted site at land at Hillfield, Lower Basildon will not be included in the LPR as an allocation under Policy SP15. The allocation of the proposed site (BAS2) is not in accordance with the findings of the evidence base including the HEELA:</p> <p>No further changes to the LPR are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Even though the settlement is one of the smaller ones in the District the boundary of the settlement is fixed which gives limited scope for future development.</p> <p>It is requested that the boundary of the settlement is extended to allow the development of the land to the north of the settlement boundary to be developed.</p> <p>Once the settlement boundary is amended to include the land at Hillfield, it is requested that the site be allocated in the Local Plan for residential development. If the site is not allocated the amended settlement boundary would enable the site to come forward as infill in accordance with Policy SP1 and SP2.</p> <p>The site is in the North Wessex Downs AONB but adjacent to the built development of Lower Basildon to the south and two residential properties to the north and is located to the west of the busy A329. As such the development of the site will conserve and enhance the special landscape qualities of the AONB and not detract from it. The proposed development of 8 dwellings will not be major development and accordingly exceptional circumstances will not be required nor will the development need to be in the public interest to justify the development.</p> <p>The land is available, and the development of the site can be delivered within the next 5 years.</p> <p>The extend of the site that is requested to be included in the settlement is shown below (<i>plan attached</i>) identified as BAS2:</p> <p>Changes sought:</p>	

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	<p>The northern boundary of the settlement boundary for Lower Basildon is amended to include the site at Hillfield (BAS2).</p> <p>Allocate the site at Hillfield for residential development of up to 8 dwellings.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP16 Sandlesford strategic site allocation

### (Proposed Submission LPR Policy: SP16 Sandlesford strategic site allocation)

Number of responses received: 40

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr902)	Objections have been submitted from the Sandlesford Joint working Group. Please refer to these objections.	Comments noted. These objections will be considered under the relevant respondent.
Newbury Town Council (lpr2259)	<p>We continue to strongly oppose this policy.</p> <p>Warren Road can never be suitable as an “all vehicle” access for the whole site of upwards of 1500 dwellings and supporting local centre. If Sandlesford is ever to be built, it does need all-vehicle access roads on each of three sides: north towards Newbury town centre; east directly onto A339 for southbound traffic; and onto A343 for traffic bound for A34 in both directions. An access road in the middle of Wash Common next to two schools and two churches must be only for emergency vehicles, buses, pedestrians, and if there is ever a “Sandlesford South”, then extend site south to enable perhaps a fourth all-vehicle access to the whole site could be onto</p> <p>Andover Road south of the settlement area at Wash Water. However, this is deemed undeliverable within the Plan period. Therefore, Sandlesford as</p>	<p>Comments noted.</p> <p>Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandlesford development and dualling of the A339 between the new Sandlesford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport</p>

Respondent (with lpr ref)	Response	Council Response
	<p>described in the SPD should not be considered until an acceptable fourth access route is deliverable.</p> <p>A 'local centre' should be a business and social 'hub' not primarily retail or employment. Changing travel and working patterns indicate that families will spend much more time in their local communities and less time "at work". Therefore, large developments such as this need to make provision for larger social and all-purpose community support facilities within the site, in partnership with the local council[s]. These must be delivered much earlier in the build-out than has been the case with recent large developments such as Newbury Racecourse and North</p> <p>The Climate Emergency, the Council's Environment Strategy and other precedents (e.g. Wiltshire's recently adopted Local Plan) lead us to believe that a much greater buffer is required around ancient woodland within this site. Unless this is provided, we believe the development will be contrary to the aims of the Biodiversity policy SP11.</p> <p>Changes: We do not believe this policy should remain in the Local Plan without a complete review because it has been shown to be undeliverable even before the Climate Emergency was announced and is certainly not deliverable now unless the SPD is revised to reflect the emerging Local Plan policies.</p>	<p>modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>The term 'Local Centres' generally refers to a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Policy DM39 introduces a presumption in favour of the provision of new or enhanced community facilities. In addition to this the Sandford Park SPD sets out that the principal community facilities to be provided are: Primary educational facilities for the new population; an extension to Park House School sufficient for the new population; Early Years and Children's Centre provision for the new population; a space for indoor community use that may include a place of worship; library provision; and small scale retail facilities to provide at least one local shop/convenience store.</p> <p>The supporting text to Proposed Submission LPR Policy DM15 Trees Woodland and hedgerows has been amended to include: <u>'Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for development. The Council will adopt a precautionary</u></p>

Respondent (with lpr ref)	Response	Council Response
		<u>approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.'</u>
Shaw-cum-Donnington Parish Council (lpr210)	In bullet 4 we read the expectation of “On site renewable energy...”, how will this be achieved without a change to building regulations?	Comments noted. West Berkshire Council declared a Climate Change Emergency in 2019 and the district's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.
Basingstoke and Deane Borough Council (lpr1482)	<p>It is noted that the Plan retains the strategic site allocation at Sandleford Park adjacent to the borough boundary (Policy SP16). It is important that policies have regard to the development's wider landscape impact (as the site would be visible from Basingstoke and Deane) and the impact of additional traffic upon north Hampshire (including the B3460 through Newtown).</p> <p>BDDBC is keen to continue to engage in suitable discussions under the Duty to Cooperate, in relation to the issues set out above and those discussed at our meeting in late 2020</p>	<p>Comments noted.</p> <p>West Berkshire Council welcomes the continued commitment to work constructively on cross-boundary matters with Basingstoke and Deane Borough Council.</p>
Environment Agency (lpr1665)	We would expect a site of this scale to provide a detailed flood risk assessment with hydraulic modelling. We have provided further comments in below in the 'Level 2 SFRA section'. We expect to see a wide buffer to the River Enborne (main river) and measures to prevent contaminated run-off entering the watercourse during and after construction. The minimum buffer would be 10m but we would expect more for this greenfield site. There may be opportunities to enhance the river corridor which would contribute to biodiversity net gain. Without this wording strengthening the allocation, the local plan could be found unsound in the future.	<p>Comments noted.</p> <p>In terms of the provision of a buffer, a minimum buffer of 10 metres is being included within Proposed Submission LPR Policy DM6 Water Quality and the policy reads:</p> <p><u>' Proposals for built development will be required to be at least ten metres away from the top of the bank of the</u></p>



Respondent (with lpr ref)	Response	Council Response
	<p>There is no mention of flood risk or the requirement for a flood risk assessment which we would expect to see, due to the size of the site and the presence of a main river (Enborne).</p>	<p><u>nearest watercourse or main river providing or retaining a natural or semi-natural habitat buffer;</u></p> <p>In terms of enhancement of the river corridors, Policy SP10 Green Infrastructure has been clarified to incorporate more measure to improve the Council's blue spaces including the following insertions:</p> <ul style="list-style-type: none"> <li>• <u>protects, enhances and supports the creation of 'wet woodland' habitats, ponds, lakes, reed beds, raingardens, and floodplain meadows;</u></li> <li>• <u>makes appropriate provision to protect, enhance, improve and maintain accessible networks of blue infrastructure, including through de-culverting, back water creation, de-silting, naturalising the channel through in-channel habitat enhancements and removal of structures where appropriate;</u></li> <li>• <u>maintains and enhances natural drainage features;</u></li> <li>• <u>provides 'buffer strips' of vegetation along the banks of water courses</u></li> </ul> <p>The requirement to submit a flood risk assessment will be included within the Policy as follows –</p> <p><u>'A detailed flood risk assessment with hydraulic modelling will be required for the whole site.'</u></p> <p><a href="#">A Supplementary Planning Document</a> (SPD) for the site was adopted in September 2013.. The SPD sets out the detail to guide future development and investment.</p> <p>Various technical studies documentation were prepared to support the SPD and this includes a <a href="#">Flood Risk and Drainage Strategy</a>.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The SPD makes reference to the Environment Agency's flood risk map shows the site to lie almost entirely within Flood Zone 1 (low probability – likelihood of flooding less than 1 in 1000 annual probability of river flooding in any year) with a very small part of the site in Flood Zones 2 and 3 adjacent to the northern bank of the River Enborne on the southern boundary of the site.</p> <p>Following representations made by the Environment Agency to the Regulation 18 consultation on the emerging draft Local Plan Review, the site was subject to a <a href="#">Level 2 Strategic Flood Risk Assessment</a>.</p> <p>Section F of the SPD sets out the development principles for the site and includes a sub-section on hydrology and drainage.</p>
<b>General consultation bodies</b>		
Heritage Forum (lpr77)	<p>SP16 We have doubts about this policy in one respect. When the full 1500 dwellings are built and occupied, Warren Road will be the obvious exit for the A34 for all of them, which will cause problems. The volume of traffic will significantly interfere with the local Andover Road traffic for schools, shops, the garage, churches, and community centres. In her comments on 18/00828, Jenny Graham of Transport Policy has already made this point. A more strategic approach is needed to connect the Sandleford estate to the A34 trunk.</p> <p>Secondly, environmental interests have expressed a preference for a 50 m buffer around the ancient woodland. A recommended buffer distance should be given.</p> <p>Changes: See above.</p>	<p>Comments noted.</p> <p>Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Proposed Submission LPR Policy DM15 Trees Woodland and hedgerows is the policy mechanism for the protection of ancient woodland, this policy has been amended and strengthened following consultation and now reads:</p> <p><u>'Ancient woodland and veteran trees are irreplaceable. Development resulting in their loss or deterioration of ancient woodland or veteran trees which are irreplaceable will not be permitted be refused unless there are wholly exceptional reasons where the public benefit would clearly outweigh the loss or deterioration it accords with the exceptional reasons identified within the National Planning Policy Framework. If wholly exceptional reasons are justified a suitable compensation strategy including its delivery and ongoing upkeep will need to be secured. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of this irreplaceable habitat'.</u></p> <p>The supporting text to Proposed Submission LPR Policy DM15 Trees, Woodland and hedgerows will be amended to include:</p> <p><u>'Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for</u></p>

Respondent (with lpr ref)	Response	Council Response
		development. The Council will adopt a precautionary approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.'
Mid & West Berks Local Access Forum (lpr1862)	<p>MWBLAF strongly supports the provision of substantial amounts of green infrastructure as part of new developments because this will encourage people to take exercise locally, thus avoiding car use and reducing pressure on existing popular sites such as Greenham Common. It should be used as a model for other developments.</p> <p>The Forum is, however, disappointed that neither the policy nor the supporting text mention the public footpath that runs across the middle of the site. The Forum believes that such public rights of way should be maintained as distinct routes within any development, are not absorbed into the road network, and maintain their existing character.</p> <p>The policy RSA 3 has excellent wording on this point, and we recommend that equivalent wording is added to this policy.</p> <p>Changes: The Forum recommends that the following 'bullet' is added to the policy:</p> <p>Development of the site will be expected to deliver:</p> <p><b><u>The protection of the rural character of the existing Public Right of Way across the site.</u></b></p>	<p>Comments noted. Although Policy SP16 will take precedence once adopted the Sandford Park SPD provides the framework for development and identifies the public right of way that runs through the site. The Council recognise the benefits that the public right of way network has environmentally but also alongside this they aid well-being in terms of both physical and mental health. Public rights of way fall under separate legislation which means that highway authorities have a general duty 'to assert and protect the rights of the public to the use and enjoyment'. In addition the West Berkshire Council Public Rights of Way Improvement Plan will be utilised to inform development proposals and forms part of the evidence base for the Local Plan. The Council agree that rights of way have an important role and so will strengthen the green infrastructure policy (SP10) adding the following additional wording:</p> <p><u>'Development proposals must take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new connections and status upgrades to the existing rights of way network will be supported'</u>.</p>
British Horse Society (lpr849)	The Society strongly supports the provision of substantial amounts of green infrastructure as part of new developments because this will encourage	Comments noted. The Council agrees that green infrastructure is an important asset which aids physical and

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	<p>people to take exercise locally thus avoiding car use and reducing pressure on existing sites. It should be noted that many horses are kept on the urban fringe with their owners living in urban areas. Thus, where needed, provision for horses should also be made to support policy DC34.</p>	<p>mental health as well as being a facilitator for active travel. The Green Infrastructure Policy (SP10) has been revised to incorporate '<u>travel</u>' in criteria c) so it now reads:</p> <p><u>' can provide pleasant and safe 'green routes' to commute or travel on foot, cycle and horseback which help to link parts of urban areas and to the surrounding countryside along blue (water) and green corridors;'</u></p>
<p>The Woodland Trust (lpr1029)</p>	<p>Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.</p> <p>Changes: We would like to see the following ancient woodland sites removed from any development site allocation.</p> <p>Crooks Copse ASNW (Grid reference: SU46916508)</p> <p>Slockett's Copse ASNW (Grid reference: SU46796474)</p> <p>High Wood ASNW (grid reference: SU47056464)</p> <p>Barn Copse ASNW (grid reference: SU46336474)</p> <p>Dirty Ground Copse ASNW (grid reference: SU46696447)</p> <p>Unnamed ASNW at SU46906387</p>	<p>Comments noted. Proposed Submission LPR Policy DM15 Trees Woodland and hedgerows is the policy mechanism within the Local Plan Review for the protection of ancient woodland, this policy has been amended and strengthened following consultation and now reads:</p> <p><u>'Ancient woodland and veteran trees are irreplaceable. Development resulting in their loss or deterioration of ancient woodland or veteran trees which are irreplaceable will not be permitted be refused unless there are wholly exceptional reasons where the public benefit would clearly outweigh the loss or deterioration it accords with the exceptional reasons identified within the National Planning Policy Framework. If wholly exceptional reasons are justified a suitable compensation strategy including its delivery and ongoing upkeep will need to be secured. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of this irreplaceable habitat'.</u></p> <p>The supporting text to Proposed Submission LPR Policy DM15 Trees, Woodland and hedgerows will be amended to include: <u>'Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for development. The Council will adopt a precautionary approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.'</u></p>
West Berkshire Green Party (lpr1839)	<p>We are dismayed to see that Sandleford, which has proved to be undeliverable, and which contravenes SP5, SP8, SP10 and SP11, remains in the draft Local Plan. The target of 1,500 homes is incompatible with the council's environmental and biodiversity policies as it is simply not possible to fit that many properties with buffer zones necessary to protect the five areas of ancient woodland.</p> <p>It should at least be scaled back substantially too much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the south side of Monks Lane as far as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</p> <p>We note that SP16 attempts to change the council's policy towards Warren Road, to become one of "four primary all-vehicle accesses" to the site. (The approved Core Strategy policy is for "sustainable transport", namely buses, cyclists and pedestrians only, not all vehicles, which was introduced at SPD stage.) Warren Road is immediately adjacent to one school and opposite</p>	<p>Comments noted. The principle of development on the site for up to 2000 dwellings has been established through the Core Strategy process and the site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport</p>

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	<p>another and to even contemplate it as being suitable for all-vehicle access to a huge housing development, including numerous HGVs during the building stage, indicates that not only does the council not care about the health, wellbeing and safety of young people in West Berkshire, but that it has taken leave of its senses. We note that DC7 in the draft plan (air quality) refers to those “who are particularly sensitive to air pollution, such as those in schools ...” Further, SP16 fails to refer to the bridge linking the Sandleford development parcels; without the bridge, approximately two-thirds of the development could only be accessed via Warren Road. We believe that all-vehicle access via Warren Road is such a problem that it is likely to render the whole development undeliverable.</p> <p>Finally, we note that the draft plan appears to change, for no good reason, the council's policy, as adopted by the amended SPD in 2015 and since reiterated on numerous occasions, “to reflect the need for a single planning application for the site” in order that any development should be coherent, coordinated and with appropriate infrastructure.</p> <p>We call for a complete review of Sandleford because it has shown itself to be undeliverable and is even more so in the wake of the Climate Emergency and the council's emerging policies on biodiversity.</p>	<p>modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p>
Binfield Badger Group (lpr2185)	<p>(comments also submitted under SP17)</p> <p>I am writing on behalf the Binfield Badger Group, Berkshire to express concerns regarding the above local plan. We are a not-for-profit organisation formed in 1985, with a growing membership base across the county. The primary aims of our group are to protect and promote badger welfare and preserve their habitat across the whole of Berkshire.</p>	<p>Comments noted. Badgers and their setts (tunnels and chambers where they live) are protected by the Protection of Badgers Act 1992 and their legal protection must be complied with. Natural England's 'standing advice' for badgers is a material planning consideration for local planning authorities and must be taken into account when making planning decisions.</p>

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	<p>We provide a framework for members and supporters to help badgers, including education, talks and meetings and also conduct regular sett surveys to understand the population and health of badgers across Berkshire. We also work in conjunction with local authorities to review and provide input into local planning applications that might impact badger habitat and have previously provide d input to schemes in West Berkshire. Having reviewed the Local Plan consultation document we have concerns with the area and extent of the scheme for both North East Thatcham and Sandlesford Park.</p> <p>As the planning team at West Berkshire Council is aware, badgers are a protected species and any development must preserve badger habitat and mitigate for their existence, ensure they are not adversely impacted and have sufficient foraging ground that allows for territory movement and expansion. Both these schemes have badger activity across the sites and indeed we have previously objected to the Sandlesford Park development as active badger evidence was found during numerous sett surveys. We also have formal sett records that show badger activity both within the North East Thatcham proposed site and on its periphery.</p> <p>On behalf of the badger group, I would therefore like to express concern with the sites chosen for this proposed Local Plan development and ask that WBC take these concerns into account.</p>	<p>A <a href="#">Supplementary Planning Document</a> (SPD) for the site was adopted in March 2015. The SPD sets out detail to guide future development and investment on the site.</p> <p>Various technical studies were prepared to support the SPD and this includes a <a href="#">Habitat Survey</a> of the development area in addition to an <a href="#">Ecological Scoping and Phase 1 Habitat Survey</a> and <a href="#">Addendum</a> which considers the ecological interest of the site and assesses the nature conservation value of the area, and explores the opportunities for ecological enhancement as part of the sites future development. The results of the Surveys were discussed with the Council's Ecologist. The ecological value of the site does not prohibit its development. However, there are a number of key features which will need to be carefully considered in bringing forward development in the design, layout and future management of the site. Section F of the SPD sets out the development principles for the site and includes a sub-section on ecology and wildlife. This sets out that any planning application will need to be accompanied by a Strategic Ecological Enhancement Plan. It also identifies that all existing features of ecological value on the development site potentially affected by the development works will be maintained and adequately protected during site clearance, preparation and construction works. Details of this will be provided as part of the submission of the planning application at the outline and reserved matters stages.</p>
<b>Other stakeholders</b>		
Jonathan Alderman (lpr548)	I only support SP16's policy inclusion of the following item: "On-site renewable energy to assist in the delivery of a carbon neutral development" IF the chosen technology is capable of demonstrating its Green credentials.	Comments noted. West Berkshire Council declared a Climate Change Emergency in 2019 and the district's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action



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	<p>I do not support CHP plants burning plastic or waste wood, i.e. high CO2 emission fuel, as their feedstock.</p> <p>These types of electricity generation plants also rely on their feedstock being delivered by HGV, which could be as many as 20 HGVs daily, every day of the year during the lifetime of the plant. These HGVs are also a source of polluting emissions, which will impact on Air Quality and the health of local residents.</p> <p>Changes: The change I am seeking is that any On-site renewable energy plant must demonstrate its Green credentials, e.g. the deployment of Carbon Capture and Storage technology and be fuelled by low CO2 emitting fuel (LPG, Natural Gas or Hydrogen).</p>	<p>and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
Alastair Jarman (lpr226)	<p>This policy removes the requirement for Warren Road to be delivered as a sustainable transport link for Sandford, I consider this to be unacceptable as the sustainability of this site will be reduced and the traffic movements and addition of pm2.5 creation and re-suspension around vulnerable receptors is against common sense, developing knowledge of health issues.</p> <p>I am pleased to see that the number of homes is to be reduced formally from 2000 to 1500 but feel the use of "approximately" is open to interpretation, I would prefer to see maximum as a limiting term.</p>	<p>Comments noted. The policy includes 4 accesses including Warren Road and states:</p> <p>'Four primary all vehicle accesses:</p> <ul style="list-style-type: none"> <li>• Two off Monks Lane</li> <li>• One through to Andover Road via Warren Road; and</li> <li>• One onto the A339'.</li> </ul> <p>The word 'approximately' is used to allow for flexibility in the design of the scheme at the planning application and so that the application can respond to local need and the individual characteristics of the site. The NPPF states that plans should ) be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, by applying the term 'maximum' it does not allow for flexibility to respond to ensure sustainable development is achieved. As the allocation has a boundary the development foot print is limited by this.</p>

Respondent (with lpr ref)	Response	Council Response
Alastair Jarman (lpr361)	<p>See more specific limits to areas to be developed, especially as many applications for this site have shown housing almost surrounding elements of the ancient woodland. I note policy DC14 refers to NPPF.</p> <p>"c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>58</sup> and a suitable compensation strategy exists;"</p> <p>There is also a discrepancy between SP16 and policies under the prefix RSA.</p> <p>RSA 26 states: "Provide a buffer of 15 metres to the areas of ancient woodland to the west of the site and provide appropriate buffers to the rest of the TPO woodland." Sandleford has numerous Ancient Woodlands and TPO's covering the site yet the TPO's are not reflected in SP16.</p> <p>I have noted this point in CS14 but add here for ease of reference that for ancient woodlands, the minimum buffer zone of 15m is solely to avoid root damage through direct impact. The size and type of buffer zone should vary depending on the scale, type and impact of the development. Where assessment shows other non-direct impacts are likely to extend beyond this distance, you are likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic, which for Sandleford will indeed be the case as currently there is zero traffic. It is therefore not a parameter that can be decided solely upon an arboricultural survey or a housing quota. This survey cannot for example consider use of pressure washers, chemical suspension, particulate matter, streetlights, car headlights, noise, pet predation, fireworks, or prevailing wind direction into account. There are many factors that could determine an appropriate buffer size to prevent degradation of ancient woodland and habitat. It is therefore not possible to predetermine the appropriate size of any buffer, only the minimum for root damage prevention through direct impact. I believe the use of 15m has been misconstrued in several of the policies in this draft plan. Even taking note of Natural England's standing advice regarding a minimum buffer of 15m to avoid root damage, it remains unclear whether this proposal could cause loss or deterioration of the ancient woodlands irreplaceable and interconnected habitat through</p>	<p>Comments noted. Proposed Submission LPR Policy DM15 Trees Woodland and hedgerows is the policy mechanism within the Local Plan Review for the protection of ancient woodland, this policy has been amended and strengthened following consultation and now reads:</p> <p><u>'Ancient woodland and veteran trees are irreplaceable. Development resulting in their loss or deterioration of ancient woodland or veteran trees which are irreplaceable will not be permitted be refused unless there are wholly exceptional reasons where the public benefit would clearly outweigh the loss or deterioration it accords with the exceptional reasons identified within the National Planning Policy Framework. If wholly exceptional reasons are justified a suitable compensation strategy including its delivery and ongoing upkeep will need to be secured. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of this irreplaceable habitat'.</u></p> <p>The supporting text to Proposed Submission LPR Policy DM15 Trees, Woodland and hedgerows will be amended to include: <u>'Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Precise buffers would need to be determined through detailed assessment</u></p>

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	<p>changes in air quality or other non-direct impacts due to a lack of design detail informing proper assessment. Many of the ancient woodlands and other copse are also listed as heritage wildlife sites.</p> <p>2) There is no mention of the valley crossing contained in SP16 yet all other critical access points are identified. When / if constructed, it will change traffic flows as it will connect parcel west, and central described as the hub containing retail and commercial units to parcel north. Until built the only connection to Parcel Central will be via Warren Road alongside many sensitive receptors and historic landscape This complicates the measurement and assessment of traffic flows and pollution sources which will in turn impact on buffer zone design.</p> <p>3) I would like to see the IDP.</p> <p>4) If NPPF 175 c is not applied to Sandleford, then I would like to see greater protection for the site's irreplaceable habitats in the plan. There also need to have stronger regard of the visual impact.</p> <p>This Landscape Visual Impact Assessment, is the most accurate I have seen to date:  <a href="http://planning.westberks.gov.uk/rpp/showimage.asp?j=20/01238/OUTMAJ&amp;index=1879410">http://planning.westberks.gov.uk/rpp/showimage.asp?j=20/01238/OUTMAJ&amp;index=1879410</a></p> <p>5) I do not think it will be possible to conserve the site, this may be a genuine aspiration or optimism bias, but I do not believe it is deliverable based on all the evidence from previous applications and reports over the last 8 years with current housing numbers and land use.</p> <p>6) Warren Road must be kept as a sustainable transport link to comply with not only DC7 and DC14, but common sense and emerging evidence on sensitive receptors by the World Health Organisation. "The World Health Organization acknowledges that current evidence suggests no safe level for PM2.5."  Public Health England 11th March 2019  <a href="https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review?fbclid=IwAR3pymcshBLAF0HWJAV7BXkOhIZJJoL8QwtuHKvG3fKdH8Tk4h4uYYWHjuY">https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review?fbclid=IwAR3pymcshBLAF0HWJAV7BXkOhIZJJoL8QwtuHKvG3fKdH8Tk4h4uYYWHjuY</a>  "Now is our opportunity to create a clean air generation of children, by implementing interventions in a coordinated way. By making new</p>	<p><u>and design when proposals are submitted for development. The Council will adopt a precautionary approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.'</u></p> <p>The Infrastructure Delivery Plan is one of the evidence base documents for the Local Plan Review and can be viewed on the Council's website <a href="#">here</a>.</p> <p>The policies within the NPPF must be taken into account in preparing Local Plans and it is a 'material consideration' in deciding planning applications. Policy SP11 Biodiversity and geodiversity is the policy in the Local Plan Review which will take into account paragraph 180 c) of the NPPF (2021).</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane</p>

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	<p>developments clean by design we can create a better environment for everyone, especially our children.”</p> <p>The shift to Electric vehicles will be slowed due to the recent economic hit of COVID following 10 years of austerity, but even with the shift to EV, 50% of pm2.5 and finer particles are from non-exhaust emissions (NEE). The siting of two new primary schools by the major entrance points on both side of the site is inexcusable when children will be exposed to the pollution effects of queuing rush hour traffic.</p> <p>The current owner of New Warren Farm has repeatedly tried to get permission to upgrade this road since at least 2009, prior to Sandford being selected and included in the Local Plan as a development site. A total of 16 applications resulted in managing to get approval for a 4.8m road that was approved with none of the scrutiny that a major development site should be exposed to.</p> <p><a href="http://planning.westberks.gov.uk/rpp/showimage.asp?j=09/01501/FUL&amp;index=259745">http://planning.westberks.gov.uk/rpp/showimage.asp?j=09/01501/FUL&amp;index=259745</a></p> <p>“Letters of representation are sceptical about the true intentions for this road. At this stage this application must be taken on its merits. Should land to the East become available for residential development in the future, the suitability of the road for adoption should be considered at that stage.”</p> <p>In the delegated report on the refusal of 15/02300/OUTMAJ the following comment was made “There are no major access routes into the site. A public footpath (GREE/9/1) runs through the site linking Andover Road (A343) in the west with Newtown Road (A339) in the east”.</p> <p>No mention is made of Footpath 5.</p> <p>The following points that impact on amenity and visual impact should be considered regarding Warren Road:</p> <p>Warren Road is only 105m in length as shown on the definitive map and continues as public footpath 5 where it joins GREE/9/1.</p> <p>Land on which footpath 5 runs is not part of any of the property deeds or land registers of adjoining properties. Land ownership and access rights do not seem to have been addressed prior to including it as an access route in the Core Strategy. There was a comment in the transport and highways response on the 18th November 2016 as follows:</p>	<p>roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In relation to the requirement for the one planning application, the Sandford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>In relation to comments regarding the provision of open space, the Sandford Park SPD still provides a framework for development and sets out the types of open spaces to be provided. This includes Country Parkland which will be located in the southern part of the site measuring approximately 82 ha / 203 acres. It will play a key role in protecting the sensitive landscape and historic significance of the southern part of the Sandford Park site in perpetuity, protecting the views when approaching Newbury.</p> <p>In terms of housing mix, a new policy is to be introduced in response to the Government’s introduction of ‘first homes’ and will be delivered as part of developer’s affordable housing contributions via s106 obligations. There will be eligibility criteria applied to this policy including a local connection criteria. This will be provided alongside other affordable housing types with a tenure split of affordable</p>

Respondent (with lpr ref)	Response	Council Response
	<p>["XXX of Donnington New Homes who stated on March 31st 2016 that "suffice to say we believe it is commercially realistic to assume that full land control will be secured by the time the above planning application is determined".]</p> <p>Footpath 5 is often referred to as a track in documentation, but its status is clearly identified as a public footpath on the West Berks definitive map. Park House School have previously requested that any footpath dissecting school facilities must be stopped up requiring a public path order.</p> <p>7) With many junctions already at capacity the ability for Sandford to generate traffic must be controlled. Whilst the housing numbers are only one element source of traffic, I feel that once a number has been decided the policy should be firm and state "maximum" not "approximately".</p> <p>8) I disagree with the supporting evidence in para 6.32, that policy GS1 requirement for a single application be deleted, the comprehensive approach will now rely on a memorandum of understanding between developers which is a statement of serious intent – agreed voluntarily by equal partners – of the commitment, resources, and other considerations that each of the parties will bring. It has moral force but does not create legal obligations. I have a letter from one developer threatening to plan the road around my property after refusing to discuss selling land. We cannot rely on morals to protect this irreplaceable habitat, rights or any other aspects or impacts on this site and surrounding area.</p> <p>The use of a memorandum of understanding between local authorities, who are subject and accountable to a code of conduct and standards in public life, is the correct use of this instrument. There are also transparency issues between developers as many dealings may be commercial in confidence and not open to public scrutiny.</p> <p>Following the Plan Review Scoping Report and accompanying Sustainability Appraisal Scoping Report in the 2018 Pro Vision for Rootes Trustees remarked, "CS3: Sandford Strategic Site Allocation. This allocation should be deleted unless the LPA is satisfied that there is robust evidence that is developable."</p> <p>This site has proved undeliverable against policies in force to date and after site selection over 8 years ago, despite 6 planning applications only one of which covered the whole site in compliance with GS1, the construction of a</p>	<p>housing contributions to be 70% social rent, 25% first homes, 5% shared ownership.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>primary school which is not intended for the use by Sandleford children, but is providing the expensive and expansive A339 Sandleford junction, and over 20 planning applications between Park Cottage and New Warren Farm many of which appear to have been raised to deliver the A343 / Warren Road access.</p> <p>SP16, deleting GS1 in favour of a MOU is attempting to plan policy around the site due to a failure to plan this site around previous policy. I think care should be taken not to weaken overall policy, transparency and accountability for one site.</p> <p>9) SP 16 says it will mitigate the increased recreational pressure on nearby sensitive wildlife sites, secure strategic biodiversity enhancements and provide a country park or equivalent area of public open space in the southern part of the site. Greenham Common is a 280-hectare site compared to around 35-hectare available as open space within the Sandleford boundary. Whilst all part of the Greenham and Crookham Plateau there is a distinct variation of habitat and topography between many of the adjacent sites and I do not believe it can be taken for granted that pressure will reduce because of additional open land at Sandleford. It may just as easily increase due to the addition footfall and pressures, created by Sandleford. When human behaviour and policy meet you do not always get the desired results.</p> <p>10) “provide a country park or equivalent area of public open space in the southern part of the site”. This seems rather loosely defined for such a sensitive site.</p> <p>11) The NPPF states “Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required”.</p> <p>SP 19 states that “In determining residential applications the Council will assess the site size, suitability and type of units to be delivered. The Council will seek a tenure split of 70% social rented and 30% for affordable home ownership, but will take into account the identified local need and the site specifics, including funding and the economics of provision. This policy is not restricted to development which falls within Use Class C3 but applies to all forms of self-contained residential development including C2 uses such as extra care housing.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Changes:</p> <ol style="list-style-type: none"> <li>1) Ensure SP16 is compliant to latest national policies, especially 175 (c), and would like to see specific limits to areas to be developed. The site must be designed around policy and best practice.</li> <li>2) The valley crossing should be contained in SP16 not only in the critical infrastructure delivery plan.</li> <li>3) I would like to see the IDP.</li> <li>4) I would like to see greater protection for our irreplaceable habitats in the plan.</li> <li>5) I do not think it will be possible to conserve the site unfortunately.</li> <li>6) If access and land rights have been resolved sufficiently to meet the 6m required width, it must be kept as a sustainable transport link to comply with not only DC7, but common sense and emerging evidence on sensitive receptors by the World Health Organisation. Warren Road should not be used for construction traffic, this will increase Pm2.5 and finer particulate matter. If it is permitted to become one of four primary access routes into the site, then it must be built to the same standard as the other three, including at least 3m shared cycle lanes. Currently Warren Road has a physical overall width limit of 10m due to historic features and private property. If it is to become an all vehicular access then it must meet the same standards and dimensions as the three other accesses, with the Local Authority taking responsibility for land purchase and not leaving developers to pressure local residents.</li> <li>7) I would like the housing limit to reflect the transport issues around Newbury in general, the policy should be firm and use the work “maximum” not “approximately” applied.</li> <li>8) Any removal of the single application must be replaced with a legally enforceable and transparent alternative.</li> <li>9) The Sandford site is enclosed by three roads and the river Enborne, all three roads are classed on the definitive map as traffic sensitive streets and the Enborne is itself an area containing protected species and habitat. I would like to see strong linkage within the plan on how and what mechanisms will manage possible conflicts between site delivery and negative traffic impacts over the 20 plus year build out. Initially the site was</li> </ol>	

Respondent (with lpr ref)	Response	Council Response
	<p>put forward for 1000 homes with 2 accesses, then changed to 2000 homes with two accesses and sustainable transport link, now 1500 homes with four all-purpose accesses. The current proposals bare no resemblance to the site at original selection.</p> <p>10) I would like to see what will be offered in the way of a country park or open space of equivalent area clarified. Especially if WBC are hoping to draw visitors away from Greenham and Crookham common SSSI. I assume the reduction of 500 homes will affect the affordability and profit on this site, and the country park seems an easy target to reduce costs.</p> <p>11) I would like Sandleford to provide affordable housing that young couples can afford to rent. I was unable to find LSP18 in this draft document set or table 4 as per SP16. On further investigation I assume this should read SP18 and Table 3?</p> <p>I would like clarification that extra care facilities which count towards affordable housing, do not reduce the number of affordable properties available for home ownership. In fact, after 8 years, I would have thought these issues could be more tightly defined within the plan for SP16 by now.</p> <p>I would like to see housing numbers, on any site, being derived from policies such as DC14 and DC7. The number of houses required to meet government housing targets or developer profits are not the correct driver for site design.</p> <p>I am pleased to see that ALL affordable homes must be carbon neutral which I assume includes any extra care homes.</p>	
Julie Knapman (lpr358)	<p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted. I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school) and the</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified. Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrbvROk49UtPbR4uE0Xp9pXkfN7TTv3VM">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrbvROk49UtPbR4uE0Xp9pXkfN7TTv3VM</a></p> <p>"This statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations"".</p> <p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system "is to contribute to the achievement of sustainable development". Policy SP16 takes away those rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer/Local Authority.</p> <p>There is no mention of the required bridge within Policy SP16, required to link central and western Sandleford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p>	<p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Policy SP16 goes against NPFF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p> <p>Changes: Remove the Warren Road all-vehicular access from the SPD and Policy SP16.</p>	<p>requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.</p>
Andrew Mauvis (lpr359)	<p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted. I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school) and the pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity. <a href="https://assets.publishing.service.gov.uk/.../clean-air...">https://assets.publishing.service.gov.uk/.../clean-air...</a> "This statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations"".</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified. Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be</p>

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	<p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system “is to contribute to the achievement of sustainable development”. Policy SP16 takes away those rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer/Local Authority. There is no mention of the required bridge within Policy SP16, required to link central and western Sandleford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p> <p>Policy SP16 goes against NPPF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p> <p>Changes: Remove the all-vehicle access to Warren Road. This has been rejected wholeheartedly by the local residents for reasons of safety, pollution and impact to the area character and local landscape.</p>	<p>undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of</p>

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		consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.
Name Supplied (lpr840)	<p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted.</p> <p>I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school) and the pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrvROk49UtPbR4uE0Xp9pXkfN7TTv3VM">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrvROk49UtPbR4uE0Xp9pXkfN7TTv3VM</a></p> <p>"This statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations"".</p> <p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system "is to contribute to the achievement of sustainable development". Policy SP16 takes away those rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer/Local Authority.</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified.</p> <p>Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the</p>

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	<p>There is no mention of the required bridge within Policy SP16, required to link central and western Sandlesford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p> <p>Policy SP16 goes against NPPF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p> <p>Changes: Please see my responses to Question 2</p>	<p>Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandlesford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.</p>
Name Supplied (lpr846)	<p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted.</p> <p>I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school) and the pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrbvROk49UtPbR4uE0Xp9pXkfN7TTv3VM">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrbvROk49UtPbR4uE0Xp9pXkfN7TTv3VM</a></p> <p>"This statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations"".</p> <p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system "is to contribute to the achievement of sustainable development". Policy SP16 takes away those rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer/Local Authority.</p> <p>There is no mention of the required bridge within Policy SP16, required to link central and western Sandleford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning</p>	<p>Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable</p>

Respondent (with lpr ref)	Response	Council Response
	<p>application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p> <p>Policy SP16 goes against NPPF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p> <p>Changes: Please see my responses to Question 2</p>	<p>provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.</p>
Steven West (lpr362)	<p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted. I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school) and the pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified. Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity.  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrbvROk49UtPbR4uE0Xp9pXkfN7TTv3VM">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf?fbclid=IwAR3_OcFcJYM4VNLw6veWcso6pKbrbvROk49UtPbR4uE0Xp9pXkfN7TTv3VM</a>            "This statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations"".</p> <p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system "is to contribute to the achievement of sustainable development". Policy SP16 takes away those rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer/Local Authority. There is no mention of the required bridge within Policy SP16, required to link central and western Sandleford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p> <p>Policy SP16 goes against NPPF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p>	<p>that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p>



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		<p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.</p>
<p>Mark Grantham (lpr365)</p>	<p>I wish to object for the following reasons:</p> <p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted. I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school), church and church hall, and the pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity.</p> <p>Statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations".</p> <p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system "is to contribute to the achievement of sustainable development". Policy SP16 takes away those</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified. Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport</p>

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	<p>rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer &amp; Local Authority. There is no mention of the required bridge within Policy SP16, required to link central and western Sandleford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p> <p>Policy SP16 goes against NPPF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p> <p>Changes: All vehicle access down Warren Road to the proposed Sandleford development is unsafe and should not be allowed. Warren Road should only permit access to existing properties and pedestrian access over the existing footpath.</p>	<p>modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.</p>

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Edward Schofield (lpr379)	<p>I primarily object to the change of status for the Warren Road access to all vehicle access for any Sandleford development due to all the objections that have been previously lodged. This should also explicitly exclude the use of Kendrick Road and Garden close lane to also avoid any confusion. I also think it should mention and explore the use of an access from closer to the A34 junction at Wash Water. This should be explored as this will remove the increase in traffic and protect the local community more, as well as the children at Falklands Primary School and Park House from the increased traffic.</p> <p>Page 61 Policy SP16 states that "Development of the site would be expected to deliver" ..."Four primary all vehicle accesses ....One through to Andover Road via Warren Road". The all vehicular Warren Road access was only introduced at SPD stage and Policy SP16 cannot bring in new policy or change existing policies without Planning Inspectorate looking at the "soundness" of the plan. The Local Plan has been submitted to the Secretary of State for independent examination by the Planning Inspectorate and any changes to the Local Plan must also be submitted. I object to the addition of the Warren Road access, after the approval of the Core Strategy, as an all-vehicle access road to the Sandleford Development due to its position next to 2 schools (Park House and Falkland Primary school) and the pollution and traffic impact on local vulnerable pedestrians, many of them children.</p> <p>It is noted that the proposed Policy DC7 Air Quality in the draft plan includes a sub item e: "it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;" Which conflicts with Policy SP16 and its attempt to make Warren Road an all vehicle access directly impacting both a primary and secondary school who are located in close proximity.  <a href="https://assets.publishing.service.gov.uk/.../clean-air...">https://assets.publishing.service.gov.uk/.../clean-air...</a>          "This statutory guidance recognises schools and active travel routes, amongst others, as "sensitive receptor locations"".</p> <p>The Core Strategy stated that the Warren Road access to the Sandleford Development would be a sustainable transport access. NPPF, paragraph 7 states that the purpose of the Planning system "is to contribute to the achievement of sustainable development". Policy SP16 takes away those</p>	<p>Comments noted. The Local Plan Review (Regulation 18) Consultation is one of the stages a Local Plan must go through prior to it going to examination. Following the Regulation 18 consultation all comments received will be reviewed and amendments made to the plan where necessary. The Council will continue to build its evidence base for the Local Plan so that the plan is justified.</p> <p>Following this the next stage in the process is known as the Regulation 19 stage which is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. This sees another round of consultation prior to its submission to the Secretary of State and Examination.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base</p>

Respondent (with lpr ref)	Response	Council Response
	<p>rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF. The planning system should be Plan-led and not Plan-amended to suit the Developer/Local Authority. There is no mention of the required bridge within Policy SP16, required to link central and western Sandleford development parcels to the other 3 access roads. If this bridge is not built, and there is currently no legal obligation to build this, it would result in 2/3 of the proposed housing only having the Warren Road for access.</p> <p>Page 63, states that the SPD was amended in 2015 "to reflect the need for a single planning application for the site". Policy GS 1 was introduced in 2017 and states that "Each allocated site will be masterplanned and delivered as a whole to achieve a comprehensive development" and "A single planning application will be submitted for each allocated site". It is proposed to delete this document as part of the Local Plan Review. I object to this action as Policy SP16 is incomplete in its detail, unclear and ambiguous, unlike Policy GS 1.</p> <p>Policy SP16 goes against NPPF Para 16d, resulting in less governance during the planning process and allowing West Berkshire Council to introduce a weaker, less detailed replacement and introducing an amendment to the Warren Road access. The intended accompanying MOU is not a legally binding document, only a statement of serious intent. The original Core Strategy was set after considering the needs and requirements of interested parties and Policy SP16, with its accompanying MOU, weakens the Democratic process as there is no right for public consultation.</p> <p>Changes: Removal of Warren Road as an Access Explore (with land owners) the construction of access from the A343 in Wash Water near the A34 junction</p>	<p>which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Local Plan Review will go through the same production stages and processes as the Core Strategy as set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. A further round of consultation will be undertaken and an examination process. Any planning application will be considered following development management procedures.</p>
Ian Dyke (lpr382)	<p>It is very unfortunate that once again WBDC are ignoring Newbury Town Council and local residents with regard to the proposal to use Warren Road as an all vehicle access to the Sandleford Development. Despite all previous very valid objections to this, and there have been many, WBDC seem, for reasons known only to themselves, to be again pursuing this in the Local</p>	<p>Comments noted. In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Plan Review. I object to this being introduced into the Review for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The all vehicle Warren Road access will be next to two schools and two churches and will have a significant pollution and traffic impact on local vulnerable pedestrians many of them being school children.</li> <li>2. The Core Strategy stated that the Warren Road access to the Sandleford Development would be sustainable access only. That is, bus, cyclists and pedestrians only. NPPF, paragraph 7, states that the purpose of the Planning system is to contribute to the achievement of sustainable development. Policy SP16 takes away these rights to achieve sustainable development within Sandleford and the surrounding area as required by the NPPF.</li> <li>3. There is no mention of the required bridge within Policy SP16, required to link central and Western Sandleford Development parcels to the other three access roads. If not built, this would lead to 2/3 of the proposed housing only having Warren Road for access.</li> <li>4. Policy GS1 was introduced in 2017 to achieve a comprehensive development and a “single planning application” for each allocated site. It is now proposed to delete this requirement which I strongly object to as Policy SP16 is incomplete in detail, unclear and ambiguous. There is also a Memorandum of Understanding between the relevant parties to the development which has no legal standing and should be dismissed.</li> <li>5. There is no evidence of a Southerly access road being considered. This makes far more sense in terms of safety, traffic impact and pollution and should be explored.</li> </ol> <p>Overall, it is very disappointing that WBDC continue to pursue the Warren Road all vehicle access. As a local resident, I am extremely concerned that this has been introduced in the Local Plan Review.</p>	<p>from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p>
Keith Hoddinott (lpr1993)	<i>Full representation is attached</i>	Comments noted. In regards to the four vehicular accesses, these are required as a result of further

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	<p>In respect of the Sandleford development, I raise strong objections to the access via Warren Road, as this is unsuitable due to the exits from the school - imagine morning traffic with the “school run” combined with commuter traffic from the development.</p> <p>Changes: In my letter dated 24th.May 2018, following some public meetings at which one of the developers did propose coordination with a proposal for development south of Garden Close Lane for such a link onto the A343., this site does not appear to be under consideration, with an improved access onto the A34. Perhaps coordinating with any future DoT upgrading plans for the A34.</p>	<p>modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>The Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p>
Colin Duff (lpr452)	<p>Any new development other than minor infill projects must be fit for the future and therefore such a large development such as this must at least be carbon neutral, preferably carbon negative. (3. Strategic objectives 1. Climate Change. Policy SP5) Developers' lack-lustre standard boxes must no longer be permissible.</p> <p>Changes: This must become a model development for the future for sustainable living.</p>	<p>Comments noted. West Berkshire Council declared a Climate Change Emergency in 2019 and the district's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Policy SP 5: Responding to Climate Change and Policy DM 3: Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>
Susan Millington (lpr464)	<p>I am dismayed to see that Sandleford, which has proved to be undeliverable, and which contravenes SP5, SP8, SP10 and SP11, remains in the draft Local Plan. The target of 1,500 homes is incompatible with the council's</p>	<p>Comments noted. In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the</p>

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	<p>environmental and biodiversity policies as it is simply not possible to fit that many properties with buffer zones necessary to protect the five areas of ancient woodland.</p> <p>Changes: It should at least be scaled back substantially too much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the north side of Monks Lane as far south as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</p> <p>I note that SP16 attempts to change the council's policy towards Warren Road, to become one of “four primary all-vehicle accesses” to the site. (The approved Core Strategy policy is for “sustainable transport”, namely buses, cyclists and pedestrians only, not all vehicles, which was introduced at SPD stage.) Warren Road is immediately adjacent to one school and opposite another and to even contemplate it as being suitable for all-vehicle access to a huge housing development, including numerous HGVs during the building stage, indicates that not only does the council not care about the health, wellbeing and safety of young people in West Berkshire, but that it has taken leave of its senses. I note that DC7 in the draft plan (air quality) refers to those “who are particularly sensitive to air pollution, such as those in schools ...” Further, SP16 fails to refer to the bridge linking the Sandleford development parcels; without the bridge, approximately two-thirds of the development could only be accessed via Warren Road.</p> <p>Finally, I note that the draft plan appears to undermine the council's policy, as adopted by the amended SPD in 2015 and since reiterated on numerous occasions, “to reflect the need for a single planning application for the site” in order that any development should be coherent, coordinated and with appropriate infrastructure. In my view this demonstrates, at the very least, bad faith on the part of the council towards the residents of Wash Common.</p>	<p>preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development</p>

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		and ensure the timely and co-ordinated provision of infrastructure.
David Kiff (lpr1632)	<p>SP13 and para 6.19 and SP16</p> <p>The application by Bloor Homes for planning permission to build 1000 homes at Sandleford Park was refused by West Berkshire Council in October 2020. They stated that they have been unable to find an acceptable solution to the problems with the development so that the development can be said to improve the economic, social and environmental conditions of the area. The Council listed 14 reasons for refusal ranging from a lack of a holistic approach, its impact on the environment and ancient woodland, impact on the A34 and failure to secure delivery of necessary infrastructure.</p> <p>The application fails to provide adequate certainty and confidence that the proposal will deliver the comprehensive development of the Sandleford strategic site allocation as a whole along with coordinated and timely delivery of the associated infrastructure, services and facilities necessary to mitigate its impact across the entirety of the SSA and beyond. Another reason was the failure of the development to meet the Council's aim for making the district net carbon zero by 2030, as declared in their climate emergency.</p> <p>It is considered to be an unsustainable and harmful development by failing to reduce carbon dioxide emissions. In addition, other reasons cited for refusal were potential harm to the ancient woodland on the site and the potential severe impact on the A34. Also failure to secure satisfactory planning obligations for infrastructure and mitigation measures.</p> <p>In the light of all of the above Sandleford Park Newbury is a totally unsatisfactory site for a major housing development and therefore be removed from the list of sites allocated for residential and mixed use development.</p>	<p>Comments noted. Although Policy SP16 will take precedence once adopted the Sandleford Park SPD provides the framework for development.</p> <p>West Berkshire Council declared a Climate Change Emergency in 2019 and the district's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan. Proposed Submission LPR Policy SP5: Responding to Climate Change and Policy DM4 Building Sustainable Homes and Businesses will be the key policy tools to achieve carbon reduction in new homes built within the District.</p>



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Jane Halliday (lpr620)	<p>It is surprising that the plan gives such strong emphasis on the Sandleford development, which has proved to be undeliverable, and which contravenes SP5, SP8, SP10 and SP11, it should be removed from the draft Local Plan.</p> <ul style="list-style-type: none"> <li>The target of 1,500 homes is incompatible with the council's environmental and biodiversity policies as it is simply not possible to fit that many properties with buffer zones necessary to protect the five areas of ancient woodland.</li> <li>It should at least be scaled back substantially to much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the south side of Monks Lane as far south as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</li> <li>The reliance on Warren Road in SP16 to become one of “four primary all-vehicle accesses” to the site. Warren Road is completely unsuitable as more than a minor access road due to its location at an already complex and very busy peak use road, close to two schools, two churches (which are used through the week for community activities and child care), a fuel station/ supermarket and a shopping area. Consequently, heavy use of the road will be in direct conflict with the health, wellbeing and safety of young people in this area of West Berkshire.</li> <li>The heavy use of Warren Road is also in conflict with DC7 in the draft plan (air quality), which refers to those “who are particularly sensitive to air pollution, such as those in schools ...”</li> <li>SP16 fails to note that for approximately two-thirds of the development Warren Road will be the main egress and ingress point.</li> </ul> <p>Changes: Delete or radically downscale the Sandleford development (to &lt;&lt;500 homes).</p>	<p>Comments noted. The principle of development on the site for up to 2000 dwellings has been established through the Core Strategy process and the site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included</p>

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	<ul style="list-style-type: none"> <li>Sandleford should at least be scaled back substantially too much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the south side of Monks Lane as far south as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</li> </ul>	<p>within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p>
Ian Halliday (lpr621)	<p>It is surprising that the plan gives such strong emphasis on the Sandleford development, which has proved to be undeliverable, and which contravenes SP5, SP8, SP10 and SP11, it should be removed from the draft Local Plan.</p> <ul style="list-style-type: none"> <li>The target of 1,500 homes is incompatible with the council's environmental and biodiversity policies as it is simply not possible to fit that many properties with buffer zones necessary to protect the five areas of ancient woodland.</li> <li>It should at least be scaled back substantially too much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the south side of Monks Lane as far south as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</li> <li>The reliance on Warren Road in SP16 to become one of "four primary all-vehicle accesses" to the site. Warren Road is completely unsuitable as more than a minor access road due to its location at an already complex and very busy peak use road, close to two schools, two churches (which are used through the week for community activities and child care), a fuel station/ supermarket and a shopping area. Consequently, heavy use of the road will be in</li> </ul>	<p>Comments noted. The principle of development on the site for up to 2000 dwellings has been established through the Core Strategy process and the site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p> <p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p>

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	<p>direct conflict with the health, wellbeing and safety of young people in this area of West Berkshire.</p> <ul style="list-style-type: none"> <li>The heavy use of Warren Road is also in conflict with DC7 in the draft plan (air quality), which refers to those “who are particularly sensitive to air pollution, such as those in schools ...”</li> <li>SP16 fails to note that for approximately two-thirds of the development Warren Road will be the main egress and ingress point.</li> </ul> <p>Changes: Delete or radically downscale the Sandleford development (to &lt;&lt;500 homes).</p> <ul style="list-style-type: none"> <li>Sandleford should at least be scaled back substantially too much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the south side of Monks Lane as far south as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</li> </ul>	<p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandleford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p>
Tim Hall (lpr651)	<p>This is an absolutely gross idea.</p> <p>Changes: Use of this site should be minimal and thought through much more carefully.</p>	Comment noted.
Peter Norman (lpr2342)	<p>SP16 The change to Warren Road to an all vehicular access to Sandleford Park should be deleted. In the latest SPD it was to be explored as an option but by now should be recognised as totally unsuitable as any access point and therefore taken out of the wording to this policy. It can only be included with a specific consultation to change the terms of reference of the SPD and</p>	<p>Comments noted. In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access</p>

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	<p>would override the conditions on which the Planning Inspector gave his approval of Sandleford as a Strategic site for housing.</p> <p>We also object to the inclusion of additional land around Sandleford for development that did not form part of the submission to the Planning Inspector</p>	<p>from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p>
Graham Storey (lpr577)	<p>I am disappointed to see that Sandleford, which has proved to be undeliverable, and which contravenes SP5, SP8, SP10 and SP11, remains in the draft Local Plan. The target of 1,500 homes is incompatible with the council's environmental and biodiversity policies as it is simply not possible to fit that many properties with buffer zones necessary to protect the five areas of ancient woodland.</p> <p>Changes: It should at least be scaled back substantially too much smaller developments to the west and NE, with fewer than 500 dwellings in total. Building along the south side of Monks Lane as far south as the new access road from the A339 would be consistent with existing development (Newbury College, Highwood Copse School, The Two Watermills), relatively non-controversial, and above all deliverable, without inflicting the huge environmental damage implicit in current proposals for the south and west of the site.</p>	<p>Comments noted. In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p>

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	<p>I note that SP16 attempts to change the council's policy towards Warren Road, to become one of “four primary all-vehicle accesses” to the site. (The approved Core Strategy policy is for “sustainable transport”, namely buses, cyclists and pedestrians only, not all vehicles, which was introduced at SPD stage.) Warren Road is immediately adjacent to one school and opposite another and to even contemplate it as being suitable for all-vehicle access to a huge housing development, including numerous HGVs during the building stage, indicates that the council not care about the health, wellbeing and safety of young people in West Berkshire, We note that DC7 in the draft plan (air quality) refers to those “who are particularly sensitive to air pollution, such as those in schools ...” Further, SP16 fails to refer to the bridge linking the Sandlesford development parcels; without the bridge, approximately two-thirds of the development could only be accessed via Warren Road.</p> <p>Finally, I note that the draft plan appears to undermine the council's policy, as adopted by the amended SPD in 2015 and since reiterated on numerous occasions, “to reflect the need for a single planning application for the site” in order that any development should be coherent, coordinated and with appropriate infrastructure.</p>	<p>In regards to the four vehicular accesses, these are required as a result of further modelling work which has been undertaken since the allocation was identified in the Core Strategy. The requirement of Core Strategy policy CS3 is therefore out of date and SP16 needs to reflect the latest transport modelling as part of its evidence base which results in the four all vehicles accesses being identified in policy.</p> <p>Comments relating to the bridge are noted, the need for valley crossings (both central and north) to be included within SP16. It is acknowledged that these are included within the SPD and would assist with the desirable provision of through routes, permeability and connectivity and access to services and facilities for all.</p> <p>In relation to the requirement for the one planning application, the Sandlesford Park SPD, introduced this requirement for the application, however this policy (SP16) removes this requirement but makes clear that the site must be delivered to achieve comprehensive development and ensure the timely and co-ordinated provision of infrastructure.</p>
Nataliya Topliss (lpr806)	The development is too large for the area.	Comment noted.
Councillor Tony Vickers (lpr552)	<p>We opposed the inclusion of Sandlesford Park in the current Local Plan and whilst we accept that this cannot be removed altogether we continue to oppose this policy and support the reasons given in the responses from Newbury Town Council (NTC) and Greenham Parish Council (GPC).</p> <p>See the comments made by NTC in its response.</p> <p>In particular we note the new policy merely requires proposals for Sandlesford Park to “have regard to” to the adopted SPD and “achieve a sustainable</p>	Comments noted. Due to the hierarchy of development plan documents a Local Plan cannot require a planning application to be in accordance with a SPD as a SPD does not follow the same process as a Local Plan and is not tested through examination in public. As such the Local Plan Review wording is very deliberate in saying ‘having regard to’ so that the appropriate status of the SPD is referred to in the Local Plan Review.

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	<p>comprehensive development”. This seems to be significantly weaker than the previous policy, expressly worded in the SPD, that the whole strategic site must be delivered through a single outline planning application and built out to an agreed and binding phasing plan.</p> <p>However we note some specific improvements in the policy, notably the “expectation” of on-site renewable energy and the emphasis on 3-bedroom (or larger) homes.</p> <p>Changes: We believe that to make Sandleford Park deliverable within the new Plan Period as a strategic site will need a complete review of its extent and any new access point off the A343, in the light of other policy changes in this new Local Plan.</p>	<p>In relation to the comments on highway impact, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p>
<b>Landowners, site promoters and developers</b>		
ProVision for Mr & Mrs Matthew Pittard (lpr1963)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached as a response to Policy SP13</i></p> <p>Policy SP16 of the draft Local Plan confirms that Sandleford Park is allocated for a mixed-use development comprising approximately 1,500 homes. Supporting text (paragraph 6.30) confirms that “<i>Delivery of approximately 1,000 dwellings is anticipated within the plan period.</i>” Sandleford Park was allocated in the Core Strategy that was adopted in July 2012. Policy CS3 of the document explains that the site is allocated for a mixed-use development including up to 2,000 dwellings. Paragraph 5.13 of the document goes on to explain that “<i>Some flexibility in delivery is anticipated, with at least 1,000 dwellings proposed to be delivered by 2026.</i>” To date, planning permission has not been granted for any residential development at Sandleford Park. In fact, planning permission has been refused on several occasions, with the most recent refusal being in October 2020 and subject to 14 reasons for refusal, while an application submitted in 2018 (for 500 homes) remains undetermined.</p>	<p>Comments noted.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council’s strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went</p>

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	<p>Without detailed evidence to demonstrate that the reasons for refusal can be overcome, the allocation of Sandleford Park for approximately 1,500 homes (with 1,000 to be delivered within the Plan-period) cannot be found sound. Even if evidence is provided to demonstrate that the site remains a suitable location for growth, based on the planning history for the site, it seems very unlikely that 1,000 homes will be delivered within the Plan-period.</p> <p>The draft Local Plan does not provide any confidence that Sandleford Park is deliverable. In particular, paragraph 6.12 sets out that <b><i>“assuming that 1,000 homes are deliverable at Sandleford Park by 2037 (with the remaining 500 in the next plan period) (our emphasis)”</i></b>.</p> <p>Furthermore, it is noteworthy that paragraph 4.9 of the Transport Assessment Report – Phase1 (December 2020) confirms that housing completions are not expected at Sandleford Park prior to 2026. In addition, the latest Annual Monitoring Report (AMR) (January 2021) confirms that <i>“Sandleford Park was previously assumed to deliver 1,000 units in the plan period, as required in Policy CS2 but, with the refusal of planning permissions in November/December 2017 and determination of new applications pending determination in 2020, the timing of delivery is more uncertain and likely to be largely in the period post 2026.”</i></p> <p>As noted above, the Council has not published a housing trajectory in support of the draft Local Plan. Therefore, to provide an indication of the timescales involved in delivering large housing sizes, it is helpful to review the second edition of Lichfield’s publication <i>“Start to Finish – What factors affect the build-out rates of large scale housing sites?”(15)</i>.</p> <p>For sites of around 1,500 dwellings, a realistic built-out rate is noted as being around 100-120 dpa (16). This means that if Sandleford Park were to be delivered at a cautionary rate of 100 dpa, first completions would need to take place around 2026/2027 to achieve 1,000 dwellings within the Plan-period. Given the site’s planning history, along with Lichfield’s finding that for similar scale sites it can take around 7 years to progress from the validation of a planning application to completion of the first dwelling<sup>17</sup>, this seems unrealistic.</p> <p>Assuming an application for 1,000 dwellings is submitted in 2022/23, first completions are unlikely to be achieved until around 2029/30. This is three</p>	<p>through all stages of consultation, examination and adoption by the Council.</p> <p>The emerging plan assumes delivery of at least 1,000 units at Sandleford Park and 1,250 at North West Thatcham by 2037. This is not considered unrealistic. Using evidence from Lichfield’s research report ‘Start to Finish’ of Feb 2020 average rates for large sites are assumed to be 160 dwellings per annum for sites of 2,000 plus and 107 for sites of 1,000 to 1,499. Using these delivery rates would entail first completions on Sandleford Park in 2027/28 to achieve delivery of the numbers assumed in the housing supply calculation. Progress will be continually monitored and adjustments made to the trajectory.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>years beyond the period needed to achieve 1,000 dwellings within the Plan-period, assuming all technical issues and previous reasons for refusal are addressed.</p> <p>In light of the above, we recommend that the allocation of Sandleford Park for development is deleted, or at the very least, the amount of housing that it is anticipated will come forward within the Plan-period is reduced significantly. Furthermore, we recommend that additional sites should be allocated for housing, focused on small / medium sized sites that can come forward quickly, particularly in the early part of the Plan-period. These should be distributed in line with the settlement hierarchy outlined in policy SP3.</p> <p>(15) <a href="https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scalehousing-sites.pdf">https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scalehousing-sites.pdf</a></p> <p>(16) Figure 7</p> <p>(17) Figure 4</p> <p>Changes:</p> <p>We recommend that the allocation of Sandleford Park for development is deleted, or at the very least, the amount of housing that it is anticipated will come forward within the Plan-period is reduced significantly. Furthermore, we recommend that additional sites should be allocated for housing, focused on small / medium sized sites that can come forward quickly, particularly in the early part of the Plan-period. These should be distributed in line with the settlement hierarchy outlined in policy SP3.</p>	
Wey Planning Ltd for Neville Baker Estate (lpr1274)	<p>1. It is considered that the proposed Sandleford strategic site allocation is unsound, primarily on the basis of clear evidence that the site is not deliverable or will not deliver approximately 1,000 dwellings by 2037. Furthermore, the combination of Sandleford Park and the Policy SP17 North East Thatcham strategic site allocation means the Spatial Strategy is overly focussed and overly reliant on the two sites to deliver a significant proportion of the WBLPR housing requirement to 2037 and maintain a 5 year housing supply throughout the plan period. This excessive focus is at the expense of greater flexibility and achieving an appropriate balance between urban and rural development that would better meet the local housing needs of rural</p>	<p>Comments noted, developers have options on the site.</p> <p>The principle of development on the site for up to 2000 dwellings has been established through the Core Strategy process and the site has been accepted as a location to provide a long-term urban extension which will deliver up to 2000 homes. The Core Strategy went through all stages of consultation, independent examination, and adoption by the Council.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>areas and help maintain vibrant and balanced communities, especially in the AONB. Consequently, it does not represent an appropriate strategy, taking into account reasonable alternative(s), which the Council has not adequately assessed.</p> <p>2. The Sandleford Park strategic site was first allocated in the Core Strategy in 2012 for 2,000 dwellings, with the aim of delivering at least 1,000 dwellings by 2026. However, in spite of several planning applications (4 refused, 1 pending consideration), the adoption and subsequent amendment (watering-down) of the Sandleford Park SPD and the passing of nearly 8 years, not a single dwelling has been delivered. A key reason for this is that the site is in multiple ownership and the landowners have consistently failed to work together to deliver a comprehensive scheme, even though the Council has agreed that it will consider separate planning applications in an attempt to move matters forward.</p> <p>3. There is no evidence to indicate that the landowners will work together to deliver an acceptable scheme in future and the Council is on record as saying “It is unlikely to assume the delivery of any units at Sandleford Park within this period” (31st March 2026) (Newbury Weekly News). The most recent Five Year Housing Land Supply (December 2019) confirms that the site is not anticipated to deliver any new dwellings by 2024.</p> <p>4. The planning history of the site confirms that an acceptable scheme for the site, even in outline, may not transpire and, at the very least, is a considerable way off. The most recent outline application by Bloor Homes and the Sandleford Farm Partnership (18/00764/OUTMAJ) was refused permission for 14 different reasons, including lack of a holistic and comprehensive approach, failure to secure the necessary infrastructure (on and off site), inconsistencies in the information submitted, education provision, flooding and impact on ancient woodland. These reasons for refusal amount to fundamental and even “in principle” objections to the development of the site and it remains unclear whether and when they will be overcome. Moreover, these fundamental objections cast significant (rather than reasonable) doubt about the suitability, availability and achievability of the site, as well as its true development capacity.</p> <p>5. Paragraph 6.29 of the supporting text to Policy SP16 states that the Council is confident that the site will deliver housing within the WBLPR plan</p>	<p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The emerging plan assumes delivery of at least 1,000 units at Sandleford Park and 1,250 at North East Thatcham by 2037. This is not considered unrealistic. Using evidence from Lichfield's research report ‘Start to Finish’ of Feb 2020 average rates for large sites are assumed to be 160 dwellings per annum for sites of 2,000 plus and 107 for sites of 1,000 to 1,499. Using these delivery rates would entail first completions on Sandleford Park in 2027/28 to achieve delivery of the numbers assumed in the housing supply calculation. Progress will be continually monitored and adjustments made to the trajectory.</p> <p>The spatial distribution of development stems from the overriding objective of enabling sustainable development. The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus will be on existing settlements, using the settlement hierarchy, set out in Policy SP3. This steers development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity, while protecting and enhancing the environmental assets of the District. The existing urban areas are regarded as the most suitable locations for future development by virtue of their existing access to services and facilities, thereby providing the opportunity to reduce out-commuting and the need to travel. Development in Newbury and the smaller towns of the District is seen as</p>

Respondent (with lpr ref)	Response	Council Response
	<p>period. However, the Council provides no evidence to support this confidence and does not give any indication of when the development is expected to commence or evidence of delivery rates to support its view that approx. 1,000 dwellings will be delivered by 2037. This is contrary to Paragraph 72 of the NPPF, which states that the Council should.....”d) Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites....”</p> <p>6. Section d) of Paragraph 72 is a recognition at national level of the many obstacles which exist in relation to the effective and timely delivery of large scale housing sites and is based on evidence at the national level. However, it is also apparent from evidence at the local level that large scale housing developments in West Berkshire experience significant delays in terms of commencement and delivery rates, such as at Newbury Racecourse and Sandford Park itself.</p> <p>7. With regard to delivery, Paragraph 76 of the NPPF states that for major developments involving the provision of housing, LPA's should assess why any earlier grant of permission for a similar development on the same site did not start, to help ensure that proposals for housing development are delivered in a timely manner. There are no planning permissions for the Sandford Park site, but it follows from Paragraph 76 that the Council should properly consider the reasons why this is the case and what it means in terms of the deliverability of the site. There is no evidence that such an assessment has been undertaken.</p> <p>8. In combination, the strategic sites at Sandford and North East Thatcham are expected to deliver approx. 2,250 dwellings by 2037. This means that District-wide, they will account for nearly 50% of all new dwellings to be delivered on allocated sites (in the WBLPR and NDP's) over the plan period (4,670 dwellings) and over 70% of all new dwellings to be delivered on allocated sites in the Newbury/Thatcham urban area (3,105 dwellings). It is considered that this amounts to an undue reliance upon the two sites to deliver, which comes at considerable risk and has significant potential to undermine the Council's ability to meet the housing needs of the area and maintain a 5 year housing land supply throughout the plan period.</p> <p>9. In combination, the strategic sites at Sandford and North East Thatcham are a significant component of the urban focus of the Spatial Strategy and an</p>	<p>contributing not only to their regeneration, through provision of additional services and facilities, but also to the rural areas they serve.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>even more significant component of the focus of development on the Newbury/Thatcham urban area. Accordingly, they are major contributors to the imbalance in the overall distribution of new housing development proposed between urban and rural areas, which is not justified by evidence and will have unacceptable consequences for the North Wessex Downs AONB, particularly in relation to meeting local housing needs and maintaining vibrant and balanced communities.</p>	
<p>Pro Vision for Newbury Racecourse (lpr1683)</p>	<p>The Consultation Document identifies several sources of housing supply across the plan period. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.</p> <p>Table 2: Housing Supply at March 2020 of the Consultation Document confirms that 4,653 dwellings have planning permission, 1,482 dwellings are allocated without permission (with a 1,000 dwellings from Sandleford Park and 482 dwellings carried forward from the HSA DPD); and a windfall allowance of 1,979 dwellings. This amounts to 8,114 dwellings – and therefore to meet the proposed requirement of 575 dpa there is a need to find a further 1,661 dwellings during the plan period.</p> <p>The Consultation Document includes the delivery of two strategic urban extensions: Sandleford Park (1,500 dwellings) and North-East Thatcham (2,500 dwellings). The Council assumes that 1,250 dwellings are deliverable at NE Thatcham within the plan period.</p> <p>It is proposed that a further 315 dwellings will be allocated via Neighbourhood Plans and 490 dwellings on newly allocated sites.</p> <p><b>Critique</b></p> <p><u>Large Strategic Sites</u></p> <p>It is anticipated that Sandleford Park and North East Thatcham will provide 1,000 and 1,250 dwellings up to 2037, respectively. The Council therefore rely greatly on the delivery of these two large strategic sites to deliver the housing need over the plan period.</p> <p><i>Sandleford Park</i></p>	<p>Comments noted. Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>The emerging plan assumes delivery of at least 1,000 units at Sandleford Park and 1,250 at North West Thatcham by 2037. This is not considered unrealistic. Using evidence from Lichfield's research report 'Start to Finish' of Feb 2020 average rates for large sites are assumed to be 160 dwellings per annum for sites of 2,000 plus and 107 for sites of 1,000 to 1,499. Using these delivery rates would entail first completions on Sandleford Park in 2027/28 to achieve delivery of the numbers assumed in the housing</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The Council’s Site Selection Background Paper (December 2020) and ‘Deliverability Update’ does not refer to the latest refusal at Sandford Park regarding planning application ref: 20/01238/OUTMAJ for up to 1,000 new homes in October 2020. This follows several previous refusals since 2017. A current application is still being considered on part of the site for around 500 new homes.</p> <p>With the above in mind, the deliverability of a strategic level of development (i.e. 1,500 new homes) at Sandford Park is questioned. There appear to still be numerous issues that have not been resolved despite the first planning application for the site being submitted in 2015.</p> <p>The latest planning application was refused for some 14 reasons, including [inter alia]: failing to ensure the holistic comprehensive development of the Sandford Strategic Site Allocation; impact on the environment, protected sites, trees and several ancient woodlands; impact on the local highway network (including the A34); and failure to secure necessary infrastructure improvements via a S106 Agreement.</p> <p>The Site is not re-assessed in the Site Assessment Site Selection Background Paper (December 2020) because the Council contend that the principle has already been accepted through the adoption of the Core Strategy. However, this approach is flawed as clearly issues have developed that the Inspector at the time would not have known. Without further evidence that these issues affecting deliverability can be resolved, the inclusion of Sandford Park within the Local Plan Review is unsound.</p> <p>If additional technical evidence can demonstrate that the site is still deliverable, there are concerns regarding the expected delivery of 1,000 dwellings across the Plan Period. It is noted that the Council, at this stage, has not provided the expected rate of housing delivery over the plan period through a housing trajectory. Nevertheless, the Council do not include Sandford Park within the Council’s five-year housing land supply - and therefore first completions are not expected before the end of the current plan period (i.e. up to 2026). This is also the approach taken in the Council’s Annual Monitoring Report (January 2021) which confirms that timing of delivery of Sandford Park is “<i>likely to be largely in the period post 2026</i>” and Phase 1 Local Plan Review Transport Assessment (December 2020).</p>	<p>supply calculation. Progress will be continually monitored and adjustments made to the trajectory.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Evidence suggests that for sites of around 1,500 dwellings, a realistic average annual build out rate is between 100 dpa to 120 dpa (Source: Lichfield's Start to Finish (2nd Edition) – How Quickly to Large-Scale Housing Sites Deliver, February 2020). As such, to deliver 1,000 dwellings across the plan period, first completions would be needed from 2026/2027. As such, given that an outline application has recently been refused it seems unrealistic – particularly given the site's history - that first completions will deliver within these timescales. Indeed, evidence demonstrates that for schemes of around 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), February 2020) and, therefore, timescales may already have been missed to fully deliver the expected provision during the plan period.</p> <p>With this in mind, due to uncertainty over the delivery of the proposal it is recommended that Sandleford Park is removed from the Plan or the scale of housing provision over the plan period reduced.</p> <p>Changes: Due to uncertainty over the delivery of the proposal it is recommended that Sandleford Park is removed from the Plan or the scale of housing provision over the plan period reduced.</p>	
Southern Planning Practice for The Saunders Family (lpr1929)	We object to the proposed allocation of Sandleford Park (Policy SP16). This site has been allocated since 2006, yet the Council has refused planning permission for its residential development twice. It is therefore considered that the site should not be considered deliverable and hence should not form part of the Council's proposed housing land supply	<p>Comments noted. Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach</p>

Respondent (with lpr ref)	Response	Council Response
		continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.
Bloor Homes & Sandlesford Partnership (lpr2173)	<p>The Core Strategy allocates Sandlesford Park as a strategic allocation for development up to and beyond 2026 as part of a spatial strategy that rightly focused new development at Newbury as the main settlement in the District. The emerging Local Plan logically maintains that strategy; national planning policy continues to direct new development to locations that can achieve a sustainable pattern of development and the characteristics of the District, and the role and function of its main settlements, remain the same.</p> <p>As the Council acknowledge in the consultation document, having reviewed its evidence, "Sandlesford Park is the most appropriate location for strategic housing delivery in Newbury". Recognising that planning permission has not yet been granted for development at Sandlesford Park, the Council "is confident that the site will deliver housing within the plan period of the Local Plan Review and is actively working to ensure this".</p> <p>Bloor Homes and Sandlesford Farm Partnership agree with this and support the continued allocation of Sandlesford Park as a strategic site in the Local Plan Review.</p> <p>In the context of the sound spatial strategy described in the previous section, the Local Plan Review intends to retain the allocation of Sandlesford Park at Newbury. As the landowners and prospective developers, we support this continued allocation, which is entirely consistent with the role envisaged in the Core Strategy for Sandlesford Park to provide new housing up to and beyond 2026.</p> <p>The Interim Sustainable Appraisal acknowledges that the Sandlesford Park site allocation would contribute to the significantly positive effect on maximising housing provision (1) as these areas have the infrastructure and facilities to support sustainable growth. It further highlights that the strategic site allocation is of a sufficient scale to make a significant contribution to affordable housing and meet the needs of different sectors in the community (para 4.30).</p> <p>Policy SP16 specifies the criteria to guide development proposals at Sandlesford Park. In broad terms these are similar to those in the Core Strategy. We comment on these various criteria in the following paragraphs.</p>	<p>Support for the allocation is noted.</p> <p>In regards to housing capacity, the Council note the general support for the capacity of approximately 1,500 dwellings for the allocation.</p> <p>In regards to minerals, the Council note the consultation undertaken with the Minerals Team.</p> <p>In regards to comments on the comprehensive development, the Council note the work to date between parties to ensure a joined up approach.</p> <p>In regards to on-site renewable energy and carbon neutral development, the Council will ensure that the Local Plan reflects the latest national guidance as the document progresses through production.</p> <p>In regards to vehicular access, the Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandlesford development and dualling of the A339 between the new Sandlesford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p>

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	<p><b>Housing Capacity</b> The capacity of the Site is now regarded to be approximately 1,500 dwellings. This reflects further, more detailed, design work undertaken by the prospective developers (Bloor Homes and Donnington New Homes) as evidenced in the most recent planning applications: Application 20/01238/OUTMAJ seeks permission for up to 1,000 new homes and an 80 bed extra care facility; Application 18/0828/OUTMAJ seeks permission for 440 new homes and a 60 bed extra care facility. This represents an appropriate capacity to be developed in accordance with the prevailing density assumptions in the Core Strategy, whilst providing predominantly family housing.</p> <p><b>Minerals</b> The requirement for a Minerals Resource Assessment is noted and this reflects the emerging Minerals Local Plan which is also subject to public consultation at the present time. The Site is within an area known to contain sand and gravel deposits and the Replacement Minerals Local Plan for Berkshire identifies minerals safeguarding areas which is relevant to Sandleford Park. Whilst assessments of potential minerals undertaken previously have identified the possibility that mineral resources underlie parts of the Site, prior extraction is precluded because of the extent of environmental constraints. In conjunction with the Council's Minerals Officer a strategy for incidental extraction as part of the development process is therefore favoured.</p> <p><b>Comprehensive Development</b> The respective development proposals referred to above in para 3.3 are considered to be aligned with one another and comprise the comprehensive development of the Site. The respective applicants have identified infrastructure requirements and intend either direct provision (such and land for education, the country park, the local centre, certain off-site highway works via S278) or planning obligations to provide financial contributions to</p>	<p>In regards to Infrastructure, an Infrastructure Delivery Plan has been produced to support the LPR and can be viewed <a href="#">here</a>.</p> <p>Comments on housing delivery are noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>facilitate other infrastructure provision. Together, this represents and ensures the co-ordinated and timely provision of infrastructure. It is particularly instructive that the Council acknowledge in paragraph 6.32 of the consultation document that development proposals can achieve a comprehensive development without a single planning application which is required by Policy GS1 of the Housing Site Allocations DPD and the Sandlesford Park SPD.</p> <p><b>On-site renewables and carbon neutral development</b>  We note that this criterion has been expanded from the equivalent in the Core Strategy which referred only to the generation of on-site renewables. In the Core Strategy, Policy CS15 provided a more detailed account of how the District Council wanted to secure energy efficiencies as part of new development, however, its provisions in relation to the Code for Sustainable Homes have been superseded by the change in the Government's approach to this subject matters.  By the present time, the Government has announced that it intends to improve energy efficiency standards via the Buildings Regulations and made a recent announcement in respect of this following its consultation on the Future Homes Standards in 2020. The Regulation 19 version of the Local Plan will need to be prepared in the context of the Government's intentions in this regard.</p> <p><b>Means of Vehicular Access</b>  Core Strategy Policy CS3 requires two points of access from Monks Lane, whereas the SPD refers to exploring additional points of access, referring to a connection to the A339 Newtown Road in the east and the A343 Andover Road via Warren Road to the west.  In respect of the former, planning permission exists for the construction of a new road to the south of Newbury College which would provide a vehicular link to the boundary of Sandlesford Park. The Council secured LEP funding specifically for the purpose of facilitating access to Sandlesford Park in this location. This road is currently being constructed and is expected to be open to traffic by 2023.</p>	



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	<p>In respect of the latter, planning permission exits for the widening of Warren Road to 4.8m and planning permission has been sought for a further widening to 6m.</p> <p><b>Sustainable Access</b> As with the current Core Strategy, the draft policy seeks a Sustainable transport link through the site and along Warren Road to Andover Road for pedestrians, cyclists and public transport. As set out in the preceding paragraphs the extent to which Warren Road can be widened is limited, although the Manual for Streets does recognise that whilst streets on bus routes should not generally be less than 6.0m wide, this could be reduced on short sections with good inter-visibility between opposing flows. Therefore, as the highway officer identified initially, the existing widening scheme can serve as a bus route.</p> <p><b>Infrastructure</b> The Policy refers to an Infrastructure Delivery Plan, but this is not appended to the consultation document. We reserve the right to make further representations in relation to this in due course.</p> <p><b>Housing Delivery</b> Whilst we note that the Council now consider Sandleford will be developed after 2026, with the grant of planning permission, there are no infrastructure or legal impediments to the development commencing and contributing a material supply of housing completions by 2026, and, as was the original intention of the Core Strategy, continuing beyond 2026. On this basis we believe the whole of Sandleford would be substantially complete by 2037. In its Annual Monitoring Report 2020, the Council acknowledge that Sandleford could deliver houses by 2026 (para 3.12 refers). We agree with this. We note that the HELAA 2020 records that the Site is Available and Achievable and Deliverable. The commentary relates to the presence of areas of ancient woodland and that a small part of the site is functional floodplain and Zones 2 and 3a (associated with existing watercourses). Both these features are well-known and understood and are taken into account in</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>the Concept Plan in the adopted Core Strategy and the Framework Masterplan in the Sandford SPD and the planning applications at Sandford. Neither precludes development of the site nor has any associated timing implication. With the timely grant of planning permission development could commence sooner than 2026.</p> <p>Summary We support the continued allocation of Sandford Park, which reflects and gives effect to the established spatial strategy. We agree with the Council that Sandford Park represents the most appropriate location for strategic housing delivery in Newbury. It is instructive in this context that the issues that have arisen in the context of the planning applications at Sandford are detailed matters relating to the scheme and not issues that go to the heart of the principle of development in this location. We generally agree with the amendments proposed to the site allocation policy but have drawn attention to amendments or clarifications that would be appropriate.</p>	
West Build Homes (lpr2139)	<p>Westbuild broadly support the Council's approach to the delivery of housing set out within Policy SP12, but have some reservations about specific matters which are set out below.</p> <p>Significant concern exists, however, about the Council's over-reliance on two large strategic sites. The Council's own experience, and that on a national level, is that strategic sites have lengthy lead-in times, and are inherently slow in delivery, and this should be reflected within the emerging plan review through the inclusion of criteria for sites not proposed for allocation to be considered, increasing the flexibility afforded to the Council and reducing the reliance upon strategic sites.</p> <p>Paragraph 6.10 of the draft emerging plan refers to paragraph 68 the National Planning Policy Framework (The Framework) and the weight that should be attributed to the benefits of using suitable sites within existing settlements for homes. What it fails to have any regard to, however, is the sub section Paragraph 68(d) which states that local planning authorities should: "work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes."</p>	<p>Comments noted. The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus will be on existing settlements, using the settlement hierarchy, set out in Policy SP3. This steers development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity, while protecting and enhancing the environmental assets of the District. Policy SP1: Spatial Strategy recognises that development will not just occur on large strategic sites and recognises that additional development will come forward on both large strategic sites and smaller non-strategic sites allocated in the Local Plan Review and in Neighbourhood Plans, together with infill development, including that on windfall sites within settlement boundaries.</p> <p>Paragraph 69 d) of the NPPF states:</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Westbuild contends that without reference to the part of the Framework, and the inclusion of such provisions within the proposed policies, the plan is flawed in its approach and does not fully meet the tests of soundness.</p> <p>Changes: Policies SP16 and SP17 should include be amended to include an expectation of the sub-division of large sites to allow small and medium enterprise developers to assist in delivering homes and infrastructure in a timely fashion.</p>	<p><i>'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</i></p> <p><i>d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes'.</i></p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can deliver infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>
Pegasus Group for Donnington New Homes (lpr1946)	<p>On behalf of my client, Donnington New Homes, I write in response to the Council's current consultation on the draft West Berkshire Local Plan Review to 2037 (hereafter 'the Plan'). My client controls the western portion of Sandleford Park as located by existing West Berkshire Core Strategy Policy CS3. That Policy allocates approximately 134ha of land to provide a strategic housing development. Donnington New Homes has consistently promoted the land for over 10 years, demonstrating my client's undaunting commitment to its delivery. In 2018, my client submitted a planning application (ref. 18/00828/OUTMAJ) for the development of land within its control that was to be considered jointly with a corresponding application submitted by Bloor Homes and the Sandleford Farm Partnership, on the balance of the site. This submission, in response to the emerging Plan (December 2020), represents my client's continued commitment to deliver the element of Sandleford Park within its control as a sustainable, strategic</p>	<p>Comments noted.</p> <p>The red line plan identifying the site will be amended.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>housing allocation within the emerging Local Plan. My client supports the continued allocation of Sandleford Park through the emerging Plan and the policies within the Plan which secure the land for that purpose and wishes to comment as follows:</p> <p>Clearly my client supports this Policy including the redefined Policy boundary which includes land known as Sanfoin on the western part of the site, and Warren Road. The confirmation, through paragraph 6.32 that the HAS DPD Policy GS1 requirement for a single planning application for the whole site has been removed is welcomed. This will allow the development to come forwards in a phased but coordinated approach.</p> <p>There is an error on the red line plan identifying the site at Figure 5 as it includes the land allocated by Policy RSA2 (North of Newbury College) which is not part of the Sandleford Park allocation and should be removed from this part of the Plan.</p> <p>Changes: There is an error on the red line plan identifying the site at Figure 5 as it includes the land allocated by Policy RSA2 (North of Newbury College) which is not part of the Sandleford Park allocation and should be removed from this part of the Plan.</p>	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR Policy: SP17 North East Thatcham strategic site allocation**

**(Proposed Submission LPR Policy: SP17 North East Thatcham strategic site allocation)**

Number of responses received: **446**

*Please note that in response to the large number of objections to this site covering a range of issues important to local people, but largely around the environmental impact of the proposal and the impact on local infrastructure, the Council has taken the decision to reduce the number of dwellings on the site and to allocate it for 1500 dwellings for delivery over the plan period. This still enables a strategic level of development which can provide onsite community facilities. It is noted, that compared to a higher number of dwellings, this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within Thatcham.*

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Thames Water Utilities Ltd (lpr1745)	The scale of development/s in this catchment is likely to require upgrades of both the water supply network and water treatment works. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network and treatment upgrades to accommodate future development/s in this catchment. The developer can	Comments noted, the developers are aware of the requirement for upgrades to the water supply network and water treatment works.  Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades.

Respondent (with lpr ref)	Response	Council Response
	<p>request information on the network and treatment infrastructure by visiting the Thames Water website  <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>. Planning, either by email <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a>  tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	
Shaw-cum-Donnington Parish Council (lpr211)	Response from Shaw-cum-Donnington Parish Council on Local Plan Consultation SP17 North East Thatcham strategic site allocation. No comment.	Noted.
North Wessex Downs AONB (lpr1627)	<p>We have some concerns.</p> <p>A number of concerns have been allayed by reading the Thatcham Strategic Growth Study and the suggested concept of village centres which focuses the green open space and biodiversity net gain to the northern fringes which creates a degree of separation from the AONB in addition to the proposed 25 metre ancient woodland buffer. However, we would feel more comfortable if the parameters of the site and green open space were set in a masterplan rather than a policy which merely requests that the development positively respond.</p> <p>Height parameters should also be set to ensure multiple height buildings are not erected towards the upper contours which would dominate the escarpment detracting from the important skyline which forms the edge of the AONB.</p> <p>The character of Harts Hill Road and Cox's Lane transitions to a rural lane not defined by pavements and kerbs and this forms part of the urban rural transition from Thatcham to the wider countryside. This is a strong characteristic which should not become overly urbanised by an allocation, it is an important approach to the AONB and Upper Bucklebury.</p> <p>Changes:  Defined set of height parameters for buildings (zones) or a contour point above which no development shall take place or roofscape visible.</p>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the</p>

Respondent (with lpr ref)	Response	Council Response
		parameters of the site, height parameters, green open space, etc.
Historic England (lpr1566)	There are a number of listed buildings in or around this area. These assets, including their settings, should be conserved. A suitable policy requirement should be added.	The draft version of the LPR will contain an updated version of the proposed allocation policy for North East Thatcham which will consider this point.
Natural England (lp1598)	This is a very large allocation in the setting of the North Wessex Downs AONB. This site is potentially acceptable in landscape terms, but must be subject to a landscape sensitivity assessment to shape the development and determine matters such as building heights. Care will have to be taken at planning stage to ensure no impact on the Thatcham Reedbeds SSSI, River Kennet SSSI and Kennet and Lambourn Floodplain SAC. A development on the scale of this allocation could have potential significant impact on these hydrological designated sites in terms of water quality and excess runoff, if mitigation measures are not implemented.	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an Ecology</p>

Respondent (with lpr ref)	Response	Council Response
		Strategy which will set out how priority habitats and ecological features will be protected and enhanced.
Environment Agency (lpr1666)	<p>We support the delivery of biodiversity net gain through habitat restoration and linkages. This is an opportunity to enhance the ordinary watercourses and include them in blue/green infrastructure.</p> <p>As mentioned above, there is a West Berkshire Council surface water detention basin within this site, which should be highlighted. Further schemes in this area are also planned.</p>	<p>Noted, the SP10 Green Infrastructure and SP11 Biodiversity and Geodiversity have been amended to strengthen the Council's position in regards to biodiversity net gain and habitat restoration and linkages.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an Integrated Water Supply and Drainage Strategy which will consider existing related infrastructure on the site.</p>
BBOWT (lpr942)	<p>The North East Thatcham Strategic Site Allocation is located within 1.7km of the Kennet and Lambourn Floodplain Special Area of Conservation (SAC). The size of the allocated site and its distance from the SAC would trigger the need for a Habitat Regulations Assessment (HRA) to determine whether development of the site could have any impact on the SAC. The allocated site was not considered in the Habitat Regulations Assessment of the West Berkshire Core Strategy (West Berkshire Council, 2010) and therefore there is no clear evidence that the allocation would not have a significant impact on the SAC. The site borders six LWS, all comprising woodland, the majority of which are designated as Ancient Woodland. Part of the western side of the site supports the UK Biodiversity Action Plan (UKBAP) Priority Habitat Wood-pasture and Parkland and therefore has the potential to support ancient/veteran trees. There is a significant risk of the woodland/parkland habitats being damaged, destroyed and degraded should the site be developed due to potential construction impacts and increased recreational pressure and threats from anti-social behaviour, vandalism and fly-tipping. Sites such as The Plantation LWS are at risk of being enveloped by development which would leave them isolated from the other areas of woodland. We could not find ecological surveys or assessments for the proposed allocation site that assessed the potential impact on designated sites or identified the potential for protected species to be present. Para. 158 of the NPPF requires Local Planning Authorities to base local plan policies on adequate, up-to-date and relevant evidence. As such surveys are</p>	<p>A HRA will accompany the draft version of the LPR.</p> <p>Baseline TVERC assessment of the site was undertaken and is referred to in the HELAA. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR.</p> <p>Applicants will need to have regard to all relevant policies in the Local Plan Review, including Policy SP11 Biodiversity and Geodiversity. This policy has been amended to include more detail on locally designated sites, such as LWS.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an Ecology Strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>required to inform judgements on suitability and capacity of development sites. We consider this particularly important where sites are close to designated sites such as the SAC and LWSs. The potential lack of ecological surveys would be in conflict with the NPPF and could result in allocations being found unsound. BBOWT believe that biodiversity has not been considered sufficiently in allocating this site and it is unclear how an allocation of this scale could be developed without a significant impact on biodiversity.</p> <p>Change proposed: BBOWT suggest an ecology assessment is necessary to determine the feasibility of the site allocation and the proposed number of dwellings.</p>	
Aldermaston Parish Council (lpr1057)	<p>With the huge growth (2500 dwellings) proposed for Thatcham North East, we believe consideration should be given to a new canal/river/railway crossing in the Colthrop area. Not only would this ease current congestion at Thatcham Railway Crossing, but also it would reduce the number of HGVs using the A340.</p>	<p>The Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys</p>

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		from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Newbury Town Council (lpr2258)	We will not comment on this in any detail but have grave reservations about the need for such a large housing development in a part of the District that is poorly connected to the wider transport network. We fear it will impact upon traffic congestion throughout the Newbury & Thatcham Plan Area and beyond and we have not seen anything in the supporting evidence to alleviate those fears. We reserve judgement until the Regulation 19 consultation stage.	Comments noted, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Cold Ash Parish Council (lpr1739)	The proposed THA20 development seems to be a reaction to the constraints, previously mentioned, that have been placed on potential areas for development; those being the decisions taken by West Berkshire District Council, in relation to AONB, and those set by others, in relation to AWE and flood zones.	Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding. As part of the LPR, all sites promoted to the Council have been assessed in the HELAA.

Respondent (with lpr ref)	Response	Council Response
	<p>It seems quite clear that the proposed development has been settled upon in response to the strong desire to limit development in the AONB, rather than the outcome of a balanced review of options. This conclusion is arrived at due to the absence of appropriate consideration of the infrastructure that would be necessary to support such a development and the impact on the surrounding villages, and the Thatcham and Newbury transport networks. As a minimum, to make the proposals viable from a transport and travel perspective, it would require significant infrastructure improvements and mitigation to address potential traffic issues into Thatcham and Newbury, the level crossing at Thatcham Station and mitigating the impact on the surrounding parishes of Bucklebury, Cold Ash, and the A4 east and Greenham Common area.</p> <p>There are also questions to be addressed on the quality of life in such a large development. A similar scale development took place in Lower Earley, south east of Reading, in the 1980's. The resulting problems with young mother's feeling isolated during weekdays are well known to anyone who lived in the area.</p> <p>With regards to the impact of this strategic site on Cold Ash Parish this huge development so close to us could well transform our parish forever, severely impacting on quality of life and sense of our community for many of our parishioners. Important iconic views could well be lost for good. As well as increased traffic, noise and pollution, there is also likely to be increased pressure on our recreational facilities (something we have seen in recent years even without the prospect of thousands of new homes just over a mile away), which will force us to protect them and prioritise them more overtly for our parishioners.</p> <p>Therefore, given the Parish Council's views on the spatial strategy's over-protection of the AONB, then we strongly urge WBC to fundamentally rethink and scale down the strategic development described in this policy, with the bulk of the allocated housing distributed more widely and equitably across the whole of West Berkshire.</p>	<p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>Settlement boundaries help direct development to those areas where there are opportunities for infill development and for re-use of brownfield land. Further greenfield allocations are however needed, and the plan seeks to allocate a range of sites of varying sizes.</p> <p>The proposed allocation of sites takes account of the evidence from the Housing and Economic Land Availability Assessment (HELAA) and Sustainability Appraisal (SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy.</p> <p>The proposed strategic allocation of North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>If the size of this strategic development is not reduced then CAPC has severe reservations as to the sustainability of the proposed development and its impact on Cold Ash Parish.</p> <p>With regards to traffic, given that the WBC traffic model is incomplete, it is difficult to make definitive comments, however at this stage we would draw attention to the following points:</p> <ul style="list-style-type: none"> <li>• Current traffic is high through the parish, particularly at certain “pinch-points” such as Hermitage Road/The Ridge, and Red Shute</li> <li>• WBC traffic growth in the strategic model appears very high on the main routes through Cold Ash parish and we anticipate further significant impact on our parish from THA20.</li> <li>• We would like to see firm evidence of sustainable mitigation and be genuinely involved in such plans because we do not believe that successful mitigation will be possible without destroying the character of our settlements.</li> <li>• Our parish road network is strictly limited and not all lanes are truly bi- directional, with widths as low as 8-5.8m.</li> <li>• Only 22% of our 22.5 km of roads have any pavements, and only 10% on both sides,</li> <li>• Our parishioners living on the main thoroughfare suffer problems of noise and air</li> </ul> <p>In addition, CAPC is concerned that should this development go-ahead the promised facilities in this policy will actually be delivered. It has often been the case in the large developments that the original proposed facilities never materialise. As such we request that the policy wording be changed from “<i>Development of the site will be expected to deliver:</i>” to “<i>Development of the site <b>shall</b> deliver:</i>”</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Thatcham Town Council (lpr1401)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation. This includes detailed comments and an annex which contains details of consultation with residents, including views expressed by residents.</i></p> <p>We do not agree with the selection of NE Thatcham as being the dominant site for the majority of all housing in West Berkshire when taking into account the connectivity constraints, and the forecast demand for economic development. Unless there is a very significant improvement to critical infrastructure, we believe there is a fundamental mismatch in policy in describing NE Thatcham as a sustainable development site.</p> <p>We also have serious concerns related to how the Local Plan is being prepared - in relation to the strategic growth masterplan activity, the status of the sustainability assessment used to score sites, and the failure to provide adequate and up-to-date evidence. Our comments cover the following four sections.</p> <p><b>1. The connection between the Strategic Growth Master-Plan Study and the Local Plan</b></p> <p>The Thatcham Strategic Growth Study is in essence a consultant's report that offers one possible approach to the development of North East Thatcham.</p> <p>The statement in the Local Plan that proposals should 'have regard (to the Growth Study) and positively respond' is insufficient to determine the legal status of the Strategic Growth Study, so it is unclear if any elements in the</p>	<p>The Thatcham Strategic Growth Study (TSGS) is a consultant's report commissioned by the Council. The Council has commissioned consultants to provide evidence in relation to various issues that relate to the local plan and all of these can be viewed on the Council's website.</p> <p>The TSGS has taken the HELAA as the starting point for assessing sites in Thatcham and has also had regard to the Council's policy position which is to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The Sustainability Appraisal is a supporting document to the LPR. SA is an iterative process and the report will be updated to reflect ongoing work and published alongside the consultation on the draft version of the LPR.</p> <p>In regards to baseline information within the SA, this is initially established through the SA Scoping Stage which took place in 2018 and subsequently updated as the Local Plan progresses to ensure the baseline information and the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Growth Study are binding on a future developer. Therefore, the key elements of the Strategic Growth Study must be included in the Local Plan itself.</p> <p>It is notable that many of the non-strategic sites have more detail defined within their associated RSA policies than the strategic site of NE Thatcham. For example, other sites have statements associated to access, air quality surveys, traffic calming, ecology protection, building style and visibility, protection of rights-of-way, preservation of tree-belts, limitation of built-form, landscaping measures, transport assessments that take into account different stages of growth, habitat surveys, etc. The precedent set by the non-strategic sites must follow through to SP 17 otherwise the policies are not consistent in detail.</p> <p>Therefore, it is essential that SP 17 defines the following:</p> <ul style="list-style-type: none"> <li>• It must set out the legal framework of SP 17 and its connection to the Growth Study</li> <li>• It must identify those policies from the Strategic Planning Exercise that are required to be followed and these should be elevated to the Local Plan</li> <li>• It must adopt, at a minimum, an equivalent level of detail as used for non-strategic sites, and it would be anticipated that for a strategic site the level of detail would be considerably greater.</li> </ul> <p><b>2. The connection between the Local Plan and the Sustainability Appraisal Report, and comments on the Sustainability Appraisal.</b></p> <p>We are unclear on the status of the Sustainability Appraisal (SA), in which an interim version has been published. We believe that the Sustainability Appraisal Report should be a robust and stable report as it forms the basis of site assessment and Local Plan evaluation.</p> <p>The introduction on the West Berkshire page invites comments on the SA, but we do not understand if this is a formal consultation. If so, this should be made clear. We understand that the SA does not carry any legal weight</p>	<p>scope are up to date. The interim IDP was published in October 2021 and is a separate document to the SA and follows a different process in its preparation to the SA. There is no requirement to publish an IDP with a Regulation 18 consultation version of a plan. An updated version of the IDP will be published to support the draft version of the LPR.</p> <p>It is not the first time that the SA and SEA have been completed in the same document, this process was followed for both the West Berkshire Core Strategy and the Housing Site Allocations DPD, both documents found sound through examination. West Berkshire are not alone in combining SA and SEA and this is common practice across Local Planning Authorities.</p> <p>As highlighted the SA is an iterative process and will be prepared alongside the LPR. The emerging draft LPR includes a policy that specifically covers climate change (Policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030. In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>once the Plan is approved therefore the key elements must be included in the Local Plan itself.</p> <p>The SA refers to baseline information which is used in forming the site assessment. Part of the baseline information is the Infrastructure Delivery Plan, yet this has not been published with the consultation. As a result, the SA is not supported with necessary evidence, and the appraisal of sites in the absence of the IDP is unsound.</p> <p>It is also unclear if this is the first time that a Strategic Environmental Assessment (SEA) has been subsumed within the Sustainability Appraisal by West Berkshire. We think that one of the most important issues on environmental assessment is the carbon assessment of new buildings, and their use. However, the net zero climate motion and associated environment strategy (2019) does not seem to be referenced. This appears to be an omission.</p> <p>The document must be brought up to date to reflect the net zero climate motion, and net-zero carbon requirements for 2030 as defined in other policies. Specifically, the agreed definition as stated in the West Berkshire Environment Strategy “that carbon dioxide will be reduced to a net zero level” must be referenced, and the calculations for renewable energy must be aligned and brought up to date. In addition, as noted in our response in section 4.19 the SA must also be brought up to date to reflect UK legislation following its exit from the EU.</p> <p>We note that throughout the draft Local Plan there are references to NE Thatcham as being sustainable. Because both documents (SA and Local Plan) are draft it is unclear which takes priority. We think it is essential that an approved SA is produced following a formal consultation prior to the next consultation on the Local Plan and site assessment being judged against it, otherwise the site assessment itself is without foundation and subject to challenge.</p>	<ul style="list-style-type: none"> <li>Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>SA offers a systematic and robust way for checking and improving on plans as they are being developed. It helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans, and thus contributes to sound plan making. The SA informs the evaluation of options and is an important part of the site selection process. It provides a key means to demonstrate the appropriateness of the emerging plan given reasonable alternatives.</p> <p>The SA will be consulted alongside the next phase of the LPR preparation.</p> <p>The SA does make an assessment in relation to traffic impact for the proposed site under SA objective 4: To promote and maximise opportunities for all forms of safe and sustainable travel. This also includes the sub-objectives 4(a): To reduce accidents and improve safety and 4(b): To increase opportunities for walking, cycling and use of public transport. The Local Transport Plan is listed as a relevant programme or plan.</p> <p>Policy SP10 Green Infrastructure has been strengthened in regards to public rights of way and the following text included: <u>‘Development proposals must take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>It is essential that a formal consultation process is followed for the Sustainability Appraisal and this must be issued and completed before the next stage of the Local Plan consultation to ensure robust process in site assessment and selection.</p> <p>The following comments refers to the scoring and assessment of NE Thatcham, Appendix 4:</p> <p>In its summary statement the SA states that "NE Thatcham is sustainable because it maximises provision of social housing, self-build plots, new green infrastructure, schools, and improvements for sustainable travel." There is no reference to traffic flow or highways infrastructure, nor does the statement align with the Environment Strategy of West Berkshire for net zero carbon. It is essential that that SA fully considers a Traffic Assessment that ensures the site is deliverable and will not lead to harm to health due to air quality, or levels of congestion that cumulatively adds to a traffic load on surrounding roads that is unable to be supported with the capacity constraints.</p> <p>From our understanding the SA is assessing NE Thatcham on the basis of statements made in the Strategic Growth Study. However, this study has no legal bearing and its proposals do not form part of policy in SP 17. Therefore, we do not accept that the site assessment is legally sound.</p> <p>The SA scores NE Thatcham significantly positive (the highest rating) for supporting active lifestyles, yet the Strategic Growth Study states that playing fields will not be supported on site. We disagree that such a strategy lends itself to the highest score possible. It is important that the SA assessment process describes how it has allocated the highest rating possible on this objective.</p> <p>The SA scores NE Thatcham significantly positive (the highest rating) for the protection and enhancement of green infrastructure, and to improve the quality of the (6) rights-of-way. Yet the (6) rights of way will all be subsumed into the development and the existing rural, and countryside, environment</p>	<p><u>connections and status upgrades to the existing rights of way network will be supported.'</u></p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>



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	<p>will be lost. There is no reference in policy SP 17 that protects right-of-way and so we disagree with the assessment that this can lead to the highest rating possible.</p> <p>The SA states that it will bring community infrastructure commensurate to the development. This implies that no support will be given if existing infrastructure is already sub-standard which is acknowledged in the masterplan, stage 1, review. Therefore, the assessment must take into account policy SP3 that "scale will be relative to existing facilities and services". On this basis we disagree that such a development can score highly, and the SA must describe how it came to this conclusion.</p> <p>The SA scores NE Thatcham highly on enhancing biodiversity and geodiversity. The assessment (SA, Appendix 4) considers boundaries to Ancient Woodland but makes no reference to mature hedgerows that will be lost, or the much broader ecological studies that would require to be conducted prior to planning approval. In the previous (2017) application it was noted that: "No phase of development shall commence until a detailed "Ecological Mitigation and Enhancement Strategy" for that phase has been submitted to and approved in writing by the Local Planning Authority. Such Strategy shall include, but not be limited to, detailed creation &amp; management of meadows, wetlands/swales, parkland, buffer zones, and reptile areas, with monitoring undertaken annually for a five-year period, followed by further monitoring in year-seven, and year ten, with a review of the Plan after the 10th Year, and provisions for reporting the results to the Local Planning Authority." The only statement in the mitigation for this SA is that "appropriate buffers for ancient woodland would be required". This is wholly insufficient for a rural site of the scale proposed which certainly requires an ecological assessment before coming to positive conclusions on enhancing biodiversity. We disagree with its conclusion and the SA must describe how it came to this position in light of the previous requirements for mitigation and ecological assessment that were prepared in 2017 for the same area.</p> <p>The SA scores NE Thatcham neutrally with regards to "enhancing the character of the landscape". We disagree with this assessment, because a</p>	<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>An Air Quality Study will inform the next stage of the LPR and will form part of its evidence base.</p> <p>Comments in the HELAA relating to the impact on the local highways network relate to a baseline position. The SA assess the site assuming that mitigation occurs.</p> <p>Emerging Draft DC2 refers to HIA to support planning applications. Should any application for development come forward on this site, it would be expected to submit an HIA as part of its supporting information.</p> <p>Technical evidence shows that a new crossing would not be required as a result of this proposed development. The council will consider the issue of a new crossing in the next version of its Local Transport Plan.</p> <p>AONBs are national landscape designations and the NPPF places great weight on conserving and enhancing these areas. The LPR takes account of this fact. The updated version of SP17 will require that existing rights of way are protected and that access to the AONB from the site is facilitated. In addition, dedicated areas of county park within the site will be accessible to the existing and future population.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>development of 2,500 dwellings on elevated land is not going to be consistent with the landscape. West Berkshire previously stated that the much smaller proposed development at Siege Cross would "would rise above the settlement to such a degree as to harm both its setting, and that of the nearby AONB". The SA must describe how it arrives at a different conclusion as to what it presented to the Secretary of State.</p> <p>The SA scores NE Thatcham neutrally with regards to air quality. The assessment makes no reference to the existing Air Quality Management Area on the A4 and the impact that increased traffic will make. The failure to account for this is in conflict with policy DC 7 which considers the cumulative effects on health from the development itself or cumulatively. The SA also states that "nitrogen dioxide have been reducing over the last 5 years" yet on the West Berkshire website it is stated that "During 2015 there were no exceedances of the annual mean, however in 2016 the annual mean NO2 concentration was exceeded at 2 sites within the Thatcham AQMA". This implies that air quality is on a worsening trend. In our view it is not credible to claim that a 2,500 development will lead to a neutral impact on air quality. It is essential that the SA must describe how it has assessed air quality, resolves the conflict with DC 7, and resolves the conflict between statements on the website and within the SA. On the basis of existing published data we disagree with the neutral rating.</p> <p>The SA scores NE Thatcham neutrally on "Will it help reduce vehicular traffic and/or congestion?". We fail to understand how the SA has come to a neutral conclusion when earlier (HELAA assessment) it is stated that "Development would have a very significant impact on the local highway network". There is a clear contradiction, and the SA must address this contradiction and describe how it came to its conclusion.</p> <p>The SA references SP5 (Climate Change) and states that the site "will be expected to help with achieving this SA objective". As we note in our response to SP 5, we do not believe the referenced policy reflects the Environment Strategy for West Berkshire. As a result, the assessment is not</p>	<p>This appears to refer to paragraph 4.6 of the SA draft report – settlement hierarchy. The settlement strategy in the LPR is based on a hierarchical approach to development as outlined in the settlement hierarchy policy.</p> <p>The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>

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	<p>meaningful. It is essential that the SA must refer back to the net-zero carbon definition as stated in the Environment Strategy.</p> <p>The SA scores NE Thatcham positively on its ability to "reduce West Berkshire's contribution to greenhouse gas emissions" yet there is no evidence as to how it will reduce emissions. We fail to understand how the development will reduce emissions as no reference to this is made in policy SP 17, nor in the masterplan. In the absence of any evidence, or stated policy, this statement is misleading. The SA must provide evidence on the carbon assessment that leads to this conclusion.</p> <p>The following more general comments refer to the main body of the SA:</p> <p>The sustainability assessment states that the development will bring "positive effects related to the objectives of improving health, safety and wellbeing". In preparing our response Councillors have collected over 450 direct responses from residents of which 93% value the green space and access to it through the existing right-of-way access and note that a separate residents petition has recorded 2,200 objections. The SA does not provide support as to how health, and well-being, is considered for existing residents and it does not adequately cover air quality. The evidence base does not include a health impact assessment, and in its absence, it appears that Officers are prejudging the outcome of a study that has not yet been conducted. Therefore, we do not agree with this statement, and if it to be included it must reflect the broader health impacts to align with DC 2.</p> <p>We agree with the sustainability assessment that we should be "maximising opportunities for safe and sustainable travel" and the electric main line through Thatcham is a recognised asset. However, for Thatcham the station remains difficult to access due to the crossing, has limited parking and is responsible for significant congestion. We do not agree that a strategic site of 2,500 properties can be considered without addressing improved access to, and over, the crossing. Alternative approaches for sustainable travel can be justified with a different approach, for example a distribution of smaller housing developments along the whole stretch of rail-line.</p>	<p>packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Noted, the LPR is informed by a range of evidence base documents such as the Playing Pitch Strategy. Plan's and Programmes produced by West Berkshire Council and other key stake holders are used to inform planning policy.</p> <p>The term 'residential led' refers to mix of development types, rather than residential first and other infrastructure and uses come after. Should the development go ahead, it would be phased appropriately to ensure necessary infrastructure does not outpace delivery.</p> <p>The Growth Study forms part of the evidence base for the LPR.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site, including the details of the country park.</p>

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	<p>We note that the sustainability assessment puts great value on the AONB and its "effects on health and equality". We do not understand why an equivalent consideration is not placed on the larger population centre of Thatcham that value access to the countryside, which may have a proportionally larger benefit on population health.</p> <p>The sustainability assessment places emphasis on "efficient of land use" yet it does not address the loss of high-quality agricultural land. We do not understand how this efficiency measure has been derived.</p> <p>We note that the sustainability assessment refers to use of land for "regeneration and change, as well as encouraging infill, changes of use and other development within the settlement boundary." The proposed strategic site is neither regeneration, infill, nor within the existing settlement boundary. Therefore, we do not agree that by this definition the NE Thatcham site meets the criteria.</p> <p>We note that the sustainability assessment "sets out a presumption against development in the countryside". It is necessary that the countryside surrounding Thatcham is given equal protection, as it is both high value agricultural land and serves as accessible green space to residents in Thatcham.</p> <p>We note that the sustainability assessment states that "policy would have a significantly positive effect in terms of the reduction of climate change emissions". We do not believe this is consistent with the environment strategy of West Berkshire that "the definition that will be adopted is that carbon dioxide will be reduced to a net zero level". We seek clarification as to whether the existing environment policy of net zero is being maintained, or whether the policy in the Local Plan has redefined the definition in the environment strategy. There is no evidence in the policy for SP 17 that carbon dioxide emissions will be reduced relative to existing levels. Thatcham Town Council, with West Berkshire Council, have previously stated our ambition to migrate towards net zero emissions and it is essential</p>	<p>Comments relating to the level of detail within the Plan have been set out above in the Council response.</p> <p>A housing trajectory will be produced as the LPR progressed which will set out details of housing delivery.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>that West Berkshire develop policies that are self-consistent with their adopted Environment Strategy. It is essential that this is addressed in both the SA and the Local Plan.</p> <p>It is essential that the sustainability assessment address the above points, is a robust and stable document, is legally sound, and that the above points regarding site assessment are addressed.</p> <p><b>3. Introductory comments on the master-planning exercise for Thatcham</b></p> <p>We acknowledge the very considerable effort that has gone into producing the Thatcham Stage 1, Stage 2, and Stage 3 reports and recognise that there is pressure for more housing. There are several key issues which we believe are not addressed.</p> <p><b>3.1) Traffic Flow</b></p> <p>The problems of traffic capacity in Thatcham are well understood, and primarily exist due to geographical constraints that lead to single primary route, the A4, supporting East-West traffic.</p> <p>Alternative route that avoids the A4 require diversion through residential roads such as Lower Way, or Bowling-Green Road, which are not designed for high throughput and have limited capacity due to residential access, mini-roundabouts, and shared usage with active travel.</p> <p>North-South routes are limited to the South due to the rail-crossing, and to the North with traffic capacity constraints introduced with the chicanes at Cold-Ash.</p> <p>We have specific concerns related to the assessment of traffic in this emerging plan that we detail in the following. We also make further recommendations in policy SP 22 that requires traffic assessments over a series of time periods such as [0,5,10,17] years.</p>	

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	<p>a. The lack of historical investment in critical transport infrastructure leads to a chronic problem in the areas surrounding the proposed development including Floral Way, A4 and Pipers Way. We note that this issue is familiar to Officers from previous planning applications and are surprised it is not referenced in the Traffic Assessment.</p> <p>The previous application for Siege Cross (2017) prepared for planning consent and included the reference that "revised signage for the approach to the Floral Way roundabout from the east to encourage more through-traffic to use the Thatcham Northern Distributor Road (NDR) via Floral Way in preference to the A4."</p> <p>We appreciate there is no easy answer to an increase in traffic flow but would draw attention to the comments by residents exiting residential roads off Bowling Green Road and Floral Way that already complain of heavy traffic flows at peak time, which creates a noise nuisance and undermines health and well-being (Annex). The narrowness of Bowling Green Road has limited capacity due to residential access, mini-roundabouts, shared usage with active travel (the cycle lane is on the pavement on one side of the road only) and has been the location of a number of recent accidents.</p> <p>Therefore, the ability to act as a relief road is limited, and creates further problems for existing residents. If mitigation was used to avoid A4 congestion by routing traffic via Floral Way and Bowling Green Road the increase to traffic flow and congestion would add to noise pollution on properties that are immediately adjacent to these roads. Such an approach would be in conflict with policy DC 4.</p> <p>Without a more substantial diversion of traffic, probably a new road route that avoids Bowling Green Road, we do not think it would be appropriate to divert traffic onto Floral Way from the A4 that transits Bowling Green Road. It certainly would not be appropriate for HGV traffic and therefore remain concerned that there is no viable alternative to the A4.</p>	

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	<p>b. In the Phase 1 Traffic Assessment (Table 5.3) there is no reference to traffic flow eastbound from the junction of Floral Way to Pipers Way. In peak-period AM it is eastbound traffic to Pipers Way on the A4 (either from Newbury and environs, or locally from Thatcham) that creates congestion. A backlog of traffic arises because of congestion at Pipers Way that backs up to the exit of Floral Way/A4, and also because traffic exiting from Floral Way has to give priority to traffic on the A4. We would expect that with the new developments and the increased demand from the location of the secondary school the traffic flow and congestion is very likely to increase. The Traffic Assessment must be updated to include eastbound traffic.</p> <p>We note that in the HELAA assessment for THA20 it is stated that "Development would have a very significant impact on the local highway network. Opportunities for modal shift should be maximised. A transport assessment would also be required". The Phase 1 Traffic Flow Assessment states that there is little difference between traffic flow with the core forecast (base case) and the future forecast with the development (+2,500 houses). This inconsistency with previous statements in the HELAA indicates to us that there is a flaw in the Traffic Assessment.</p> <p>c. From our understanding of Table 5.3 it appears that traffic flow on Floral Way has not been considered. This is the main access road to the proposed development. It is a serious omission if not included and the Traffic Assessment must be updated to include this road.</p> <p>d. The illustrative map (Appendix B, Traffic Assessment) also implies there is no congestion on any of section of the A4 either side of Thatcham or approaching Newbury. There is no explanation why this is the case. The Traffic Assessment needs to be revisited, and an explanation is essential.</p> <p>e. We think it is important that the traffic assessments also take into account that the A4 through Thatcham is an essential route for blue-light services to reach the primary A&amp;E hospitals in Reading, and in Basingstoke. Ambulances for Basingstoke use the Brimpton bridge crossing as Thatcham</p>	

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	<p>crossing is often closed with unpredictable access. We are concerned that with increased congestion on the A4, and the various demands on the A4 (primary trunk road, active travel, M4 diversion route, central route for local traffic) blue-light services will be compromised.</p> <p>From the emerging draft plan, we do not believe sufficient consideration has been given to the above points and that the evidence base is incomplete. The Traffic Assessment should consider access for emergency services that use the A4.</p> <p>f. On the access to the South and the rail crossing:</p> <p>There appears to be a failure to account for the implications of the rail-crossing, which can be shut for up to 40 minutes per hour, substantially limiting traffic movements and creating serious congestion within Thatcham resulting in queues approaching 1km in length (information as disclosed by WBC). The supporting maps in the Traffic Assessment (Appendix B-E) indicating locations of congestion omits the queuing of traffic and leads to a false and misleading impression of traffic in the area.</p> <p>This is inconsistent with the statement in the Thatcham Stage 1 review that states "long queues often forming in peak periods on both sides of the railway, which sometimes do not clear before the barriers come back down" nor the evidence on the ground that Officers will be familiar with. This is a very serious issue for the Town and the Traffic Assessment must be revised to include these known issues.</p> <p>We note that the masterplan refers to a cost/benefit analysis for a bridge that has been conducted, but this is not provided in the evidence pack. This analysis must be shared as part of the evidence base.</p> <p>We note that the dismissal of a bridge is based on assertions that it distracts from other transport modes. We disagree with this statement as the employment centres of Basingstoke are only accessible by private vehicular use. It is essential that the Traffic Assessment, and the Thatcham Strategic</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>Growth Plan, address this issue and describe the other transport modes that are considered as alternative to the crossing in order to assess if this is credible.</p> <p>The dismissal of a bridge is also based on an assertion that implies new residents are unlikely to access the employment centres in Basingstoke. We disagree that new residents are less likely to use the bridge than residents in immediately adjacent areas.</p> <p>The assessment of transport must also include the capacity of car parking on the North side of the crossing (as the South side is often inaccessible due to the crossing being closed). There will be a substantial increase in demand if the station is to be encouraged, as not everybody can walk/cycle to the station from NE Thatcham. As far as we can tell, this capacity constraint hasn't been considered. Nevertheless, Thatcham Town Council have consulted with GWR on issues related to increasing car parking space to the North of the station, but no resolution has been identified due to a shortage of land.</p> <p>In our view, the lack of a proper North/South route for Thatcham means that the prospect of a bridge has to be considered to replace the crossing. It would open up employment centres in Basingstoke without having to divert commuters through the A4, and it would also make the retail park more accessible for residents. It would also enable a more holistic approach to transportation increasing access and use of the electric trains reducing reliance on personal vehicles. This is a view shared with the overwhelming majority of our residents.</p> <p>We do not believe the assertions made to justify the dismissal of a bridge are credible. In our view a new town of 2,500 properties cannot be supported without resolving this issue.</p> <p>We note the comments in the Stage 2 Thatcham master-planning exercise that adding a bridge would cost around £15mln. In our view, central</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>government funding should be sought for this development as it serves multiple districts and forms part of national infrastructure.</p> <p>We do not agree that the masterplan has addressed constraints that the level-crossing introduces on Thatcham and we do not agree that alignment with the masterplan will lead to benefits to either existing, or new, residents, of Thatcham. It is essential that the strategic plan accurately assess the demand and addresses the points above.</p> <p>We provide further comments on traffic modelling in policy SP 22.</p> <p><b>3.2) Improving services and facilities for Thatcham residents.</b></p> <p>We note that the master plan refers to the existing Local Plan (2012) Statements such as "Thatcham town centre will be a focus for regeneration, enabling the town to fulfil its role within the District's Hierarchy of Centres by improving the retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages will be improved and encouraged within the development of the new town centre."</p> <p>In the period since 2012 there has been increasing encroachment of residential development around the town centre, and the recent development by McCarthy &amp; Stone reduces space for the town-centre to expand. The remaining area of the town is within a conservation area. In our view the opportunity for 'a new town centre' as previously envisaged has been missed and the town is increasingly 'hemmed-in'.</p> <p>We acknowledge that a strategic development may release funds for investment in the area. Nevertheless, without the publication of the IDP we are unable to assess that the previously identified shortfalls will be addressed, and whether the previous commitments to town centre regeneration remain a priority.</p> <p>We also note that the Inspector's report in 2012 stated that "reference to development (on greenfield sites adjoining the settlement] addressing local</p>	

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	<p>needs is thus misleading and needs to be more circumspect". We therefore reserve judgement to the benefits that will be delivered to the residents of Thatcham when considered against the growth in traffic, and the much-reduced access to green space.</p> <p>Therefore, we do not accept that the masterplan is sufficient justification to progress with NE Thatcham as a strategic site as the evidence base is missing key information.</p> <p><b>3.3) Leisure Access and Playing Fields</b></p> <p>The NE Thatcham Strategic Growth Report proposes that 'an additional 1ha' of playing fields at the existing Henwick Worthy sports field would contribute to the development. This site is managed by a Joint Management Committee (JMC) that have not been approached to assess whether this is feasible. It is important that the statements in the Draft Local Plan are credible and based on evidence.</p> <p>Our understanding is that there is no space for 'an additional 1ha' of playing fields, nor is there capacity for car-parking as demand frequently exceeds capacity resulting in parking on Henwick Lane and neighbouring residential roads.</p> <p>It is essential that the statement is corrected to note that availability of additional land at Henwick Worthy is made conditional on the outcome of discussions with the JMC.</p> <p>As far as we can tell, there is no provision in the master-planning work for improvement of the Kennet Leisure Centre. This facility is in need of refurbishment and appears to have been de-prioritised by West Berkshire relative to other facilities in the region such as Northcroft Leisure Centre in Newbury that has been identified for at least £4million investment.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The proposed playing field strategy for NE Thatcham should align with the emerging West Berkshire Leisure Strategy and be included in the evidence base prior to future consultation.</p> <p><b>4. Comments on the SP 17 policy including references to Strategic Growth Study (Stage 3)</b></p> <p>The following comments refer to the SP 17 policy and statements.</p> <ul style="list-style-type: none"> <li>• "is allocated for a residential-led development."</li> </ul> <p>Within the Thatcham Strategic Growth Study considerable emphasis is given to the development of local employment and the addition of office space that will reduce the requirement to travel off-site. It is unclear to us to how this would be delivered and phased, when it is a residential-led development.</p> <ul style="list-style-type: none"> <li>• "The site will be delivered to achieve a sustainable, comprehensive and landscape-led development."</li> </ul> <p>We have covered the comments about sustainability above and challenge the claim that it is sustainable when it does not consider traffic flow and its impact on surrounding roads.</p> <ul style="list-style-type: none"> <li>• "supportive of proposals which have regard, and positively respond, to the master planning work contained in the Thatcham Strategy Growth Study."</li> </ul> <p>We have covered our concerns on the status of the master planning work above. It is unclear if the Growth Study is binding, and its relation to policies in the Draft Local Plan.</p> <ul style="list-style-type: none"> <li>• "a new strategic country park"</li> </ul> <p>We note that considerable emphasis is given to this within the Strategic Growth Study which includes 19 separate references. However, it is unclear</p>	

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	<p>to us exactly what is defined by a strategic country park and where it is located, but our understanding is that it is the area of land that is uneconomic to be developed due to location on high ground or incline. If so, these areas are existing agricultural land and unwooded and not typical of a country park which are usually associated with mature trees. It would take many years to establish the characteristics of a typical country park. If this is the case it should be stated in the strategic plan.</p> <p>Reference is made to access to the North Wessex Downs, yet the proposed development appears to subsume 6 existing rights-of-way that already provide this access. It is not apparent that the proposed location for the Country Park provides increases access to the North Wessex Downs.</p> <p>It is also stated that the country park links are strongly connected to the existing town, encouraging greater accessibility of the countryside. It is not clear to us why a country park at the edge of a new development increases accessibility for existing residents of Thatcham. The Strategic Growth Study should provide explanation to why this access is improved relative to the existing right-of-way access as 93% of our residents value the existing green space and countryside.</p> <p>We understand the desire for developers to promote a country park as it puts into use uneconomic development land, however this should not be used to justify a lack of delivery of other forms of recreational land such as playing fields. We have received no feedback from our residents that there is demand for country park for recreational use.</p> <p>We recall the inspector's previous words "reference to development (on greenfield sites adjoining the settlement] addressing local needs is thus misleading and needs to be more circumspect".</p> <ul style="list-style-type: none"> <li>• "small-scale employment space"</li> </ul>	

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	<p>We agree that interspersed employment space is attractive and may help to reduce vehicular use. It is unclear to us if the employment space is proposed to be adjacent to Colthrop Industrial Estate or interspersed through the residential areas. It is also unclear as to who develops this infrastructure - would it be a condition of planning or would it be led by West Berkshire Council. We suggest that this is also clarified in the economic plan as it is a different approach to the current focus of Arlington and Newbury Business Park which appear to be the centre of anticipated growth.</p> <p>As we note in the introduction, we believe there is a lack of detail for this policy when compared against the non-strategic sites. A much greater level of detail is essential for a strategic site and it essential that where precedent is made for other non-strategic sites, the same level of clarity is introduced into this policy. Without such detail in SP 17, the Sustainability Appraisal itself is fundamentally flawed because it is assessed against a proposed site that does not have binding commitments. This is a significant failing in the Plan.</p> <p><b>Section 6.45</b></p> <ul style="list-style-type: none"> <li>• "Delivery of at least 1,250 dwellings is anticipated within the plan period."</li> </ul> <p>We are unclear as to the anticipated rate of development. There is a very large difference between 1,250 dwellings and the upper level of 2,500. The statement should describe the likely rate of development in order that phasing for other community assets can be assessed. It is important that Thatcham is not left waiting for 17 years before substantial benefits to town centre re-generation, leisure centre refurbishment, community infrastructure and social services is delivered.</p> <p><b>Section 6.47</b></p>	

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	<ul style="list-style-type: none"> <li>"As work on the Local Plan Review progresses it will include any additional, specific, mitigation measures and infrastructure requirements."</li> </ul> <p>We agree with the Thatcham Stage 1 review that "Development would have a very significant impact on the local highway network." Without a strategic transport review that includes a bridge, and diversionary routes that avoid transiting the residential routes of Bowling Green Road we do not accept that mitigation of increased traffic flow can be accommodated without creating harm through air quality degradation, and noise pollution, to existing residents. This needs to be addressed immediately to ensure there is a credible route going forwards.</p> <p>We are concerned that a strategy that places so much reliance on a single site that has strategic infrastructure limits may ultimately be undeliverable.</p>	
Oxford and Country Planning Ltd for Bucklebury Parish Council (lpr1920)	<p>The Parish Council strongly objects to the proposed North East Thatcham Strategic Site Allocation for 2,500 dwellings (Policy SP 17). The reasons for their objections are summarised in the headings below, which are then expanded upon in the body of the letter:</p> <ul style="list-style-type: none"> <li>Harm to the setting of the North Wessex Downs AONB;</li> <li>Erosion of strategic gap between Thatcham and Bucklebury;</li> <li>Impact on the local highways network;</li> <li>Surface water flood risk;</li> <li>Impact on nature conservation;</li> <li>Harm to the setting of listed buildings; and</li> <li>Housing requirement in the light of the publication of the new standard method.</li> </ul> <p><b>Harm to the setting of the North Wessex Downs AONB</b></p> <p>The development will have a major adverse impact on the appearance of the distinctive landscape character of the land between the north of Thatcham and Bucklebury. This area makes an important contribution to the setting of the AONB boundary of which runs less than 600 metres to the north of the proposed allocation.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p>National Planning Practice Guidance (NPPG) at para 039 of the Natural Environment Guidance confirms that the Local Authorities duty of regard is relevant in considering development proposals that are situated outside AONB boundaries which might have an impact on their setting or protection. Para 042 the NPPG specially address how development within the setting of protected landscape should be dealt with. It states that <i>Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these area will therefore need sensitive handling that takes these potential impacts into account.</i> The evaluation of the North East Thatcham allocation must include a proper assessment of the potential sensitivity of the site and its impacts on setting of the AONB.</p> <p><b>Erosion of strategic gap between Thatcham and Bucklebury</b> The proposed allocation will significantly erode the open landscape which forms an important strategic gap between Thatcham and Upper Bucklebury. The existing landscape rises from the Kennet Valley quite steeply towards the North Wessex Downs and Bucklebury Common. It is a very attractive area of countryside with well-maintained and historic hedgerows, ancient trees, and well-established woodland blocks.</p> <p>The National Planning Policy Framework (NPPF) states at para 170 that <i>Planning policies and decisions should contribute to and enhance the natural local environment by (amongst other things) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.</i></p> <p>It is important that there is a full and independent assessment of the proposed allocation on the landscape character of the area including</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>



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	<p>impacts on local identity as well as visual prominence given the site is on rising ground.</p> <p>It is noted that in the suitability conclusions in the Housing Land Availability Assessment (HELAA) that there is, <i>Concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.</i></p> <p>Furthermore, the HELAA states that, <i>Development to the north of Floral Way does not conform to the current settlement pattern of Thatcham.</i> Floral Way and Bath Road form strong and well-defined boundaries between the built-up edge of Thatcham and the open countryside beyond. If this boundary is breached there will be resulting harm to the character and separate identities of Thatcham and the rural settlement of Bucklebury.</p> <p><b>Impact on the local highways network</b></p> <p>The proposed development at North East Thatcham will have a very significant impact on the local highways network. This is acknowledged in the evidence base for the site in both the HELAA (Site Ref THA20) and the Site Selection Background Paper (Appendix 4b). These impacts are highlighted for the A4, Northern Distributor Road and Thatcham town. However, the evidence base does not consider the impacts on the wider road network. The consequential increase in traffic on the two minor roads that run through the Parish is of great concern to the residents of Bucklebury. These roads provide a route from Thatcham through the two main parish centres, Upper Bucklebury and Chapel Row to Theale, Reading and M4 in one direction and through Bucklebury and Marlston villages to Hermitage and the A34/M4 junction in the other direction. These routes are already used as ‘rat runs’ for traffic seeking to avoid existing congestion problems on Floral Way and the A4 through Thatcham and Newbury. The roads through these villages are rural in nature, mostly lacking footpaths, with numerous junctions and blind bends. The inevitable increase in traffic on the roads through the Parish arising from the North East Thatcham development could create an unacceptable impact on highway safety. The absence of a detailed traffic assessment on the wider rural</p>	<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The</p>

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	<p>network is a fundamental omission from the evidence base which risks the Local Plan being found 'unsound'.</p> <p><b>Surface water flood risk</b> There is a real risk of surface water flooding in the area being exacerbated by the development. The site is crossed by a number of natural drainage routes and ephemeral watercourses.</p> <p>It is noted in the HELAA that there are surface flow routes through the site, one of which is a major surface water flood flow. It is also noted that there is a medium risk of groundwater flooding in part of the site and there is limited potential for infiltration due to high ground water levels. These constraints may well reduce the potential developable area to accommodate extensive attenuation measures.</p> <p><b>Impact on nature conservation</b> There is likely to be considerable harm to local biodiversity resulting from the development at North East Thattham.</p> <p>It is noted in the HELAA that the Thames Valley Environmental Research Centre states that there is a <i>high risk of adverse impacts</i> on nature conservation. These include priority habitats, ancient woodland, protected species, a Site of Special Scientific Interest and Local Wildlife Sites in close proximity to the site. Much of the upper slopes are designated a Biodiversity Opportunity Area, part of the Bucklebury Plateau BOA, and the site is within a local habitat network. The BOA contains important habitats which should be retained and enhanced.</p> <p>Para 174 of the NPPF states that plans should <i>promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity</i>. The proposed allocation fails to demonstrate how these requirements will be achieved.</p>	<p>covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. This includes policy DM19 Listed Buildings. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach</p>

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	<p><b>Harm to the setting of listed buildings</b> The scale of the proposed development could adversely impact upon the setting of the two listed buildings at Siege Cross Farm and the listed barn at Colthrop Manor.</p> <p>The NPPF states (para 190) that, <i>Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)..... They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.</i> In terms of potential impacts of a proposed development, the NPPF states (para 193) that, <i>great weight should be given to the asset's conservation and that (para 194) Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.</i></p> <p>In order to make a proper judgement of the effects of the proposal on these listed buildings, a full Heritage Impact Assessment should be undertaken to inform decision making.</p> <p><b>Housing requirement in the light of the publication of the new standard method</b> (This section of the representation relates to SP12 and has been recorded as a separate representation)</p> <p><b>Conclusion</b> Bucklebury Parish Council <b>strongly objects</b> to the proposed North East Thatcham Strategic Site Allocation for 2,500 dwellings There are a number of identified negative impacts of the proposed development outlined above, which have not been given sufficient weight or full consideration in developing the Local Plan. There are conflicting conclusions regarding the site in the Council's evidence base. In the Sustainability Appraisal the summary states, <i>There are a number of positive and significant positive sustainability effects that</i></p>	<p>which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>

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	<p><i>developing the site would have. In contrast there are very few negative impacts.</i> However, the HELAA highlights a number of negative impacts. Indeed, in the suitability conclusions of the HELAA the overall assessment is stated as <u>suitability unknown</u>. Similarly, in the achievability section of the HELAA, the overall conclusion is <u>achievability unknown</u>. This disparity needs to be explained.</p> <p>It is clear that there are a range of factors and technical issues which require much further detailed investigation to determine whether the North East Thatcham proposal is a justified and appropriate allocation. Without a proper evidence base the Local Plan could be found 'unsound'.</p>	
Bucklebury Parish Council (lpr1688)	<p>Bucklebury Parish Council strongly OPPOSES the proposed development of up to 2500 houses at North East Thatcham (SP 17). BPC has held four public meetings to brief parishioners on the proposal. Their subsequent representations to WBC, copied to BPC, have been taken into account in making these comments.</p> <p>The main themes of our objection may be summarised as follows:</p> <p><u>Flawed housing demand analysis</u> The analysis of housing demand predicated this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking WBC's own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed.</p> <p><u>Strategic Gap</u> A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and would visually and socially break natural community boundaries. Breach of the</p>	<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach</p>

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	<p>strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed.</p> <p><u>Traffic</u> A development of the scale proposed would generate considerable traffic but the analysis in the proposal underestimates the volume and impact on the Parish. It is assumed that the bulk of the new traffic would use the A4, accessed via Floral Way. However, the A4 is already overloaded at peak times and new residents would look to find alternative routes. These inevitably would be through the Parish for those looking to access the A34 and the M4. The roads through these villages are ill suited to additional traffic; they are rural, single carriageway roads mostly lacking footpaths and featuring blind bends. Speeding is a well-known problem in the Parish and more cars would make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and would endanger children walking to school.</p> <p><u>AONB and The Common</u> The proposed development abuts Bucklebury Common and AONB. This development would have a lasting and negative impact on these special environs. The impacts fall into two categories; those that impact the AONB directly and those resulting from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. Importantly the plants in and bounding the AONB would suffer and the Common would be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles. The visitor numbers, from the proposed development, would exacerbate damage to a struggling ecology.</p> <p><u>Pollution</u> The development would generate extraneous light that would upset the life of birds and mammals; they cannot adapt and would be driven from their habitats. This light pollution would also affect the residents of Bucklebury by spoiling their night sky. The volume of homes proposed would generate</p>	<p>which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes. The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

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	<p>pollution from carbon emissions and those associated with population density. The clean air of the Common would be a thing of the past. The following are the major reasons for objection of BPC and are listed against the SPs of the Local Plan.</p> <p><b>1. <u>North Wessex Downs AONB (SP 1 &amp; SP 2)</u></b> This proposal offers none of the required protections to the AONB, and in fact is active in massive development right to the AONB's boundary. By proposing it, WBC is failing in its stated Objective to protect this Nationally defined area.</p> <p>There is a certain irony that one of the two HELAA sites in Upper Bucklebury was rejected because of its potential harm to the natural beauty and special qualities of the AONB. This rejection was entirely within the protections that should be afforded to the AONB, and WBC's development hierarchy; however, instead WBC suggests that 2,500 houses a stone's throw from that same boundary will have less detrimental effect to those special qualities and natural beauty.</p> <p>There have been many pages written on THA20, but they are all Thatcham centric; very little, if anything has been put forward about the direct and devastating effect of this development on Bucklebury. WBC is required by its own Strategic Objectives to "...conserve and enhance the North Wessex Downs AONB." Strategic Objectives "represent the key delivery outcomes that the Local Plan Review (LPR) should achieve and it is against these objectives that the success of the LPR will be measured." Failing to protect the AONB means that the entire Local Plan would have in effect failed. Paragraph 4.23 of the LPR states: "The primary purpose of AONB designation, 'to conserve and enhance the natural beauty of the area area', is set out in the Countryside and Rights of Way Act 2000. .... its natural beauty is a function of the relationship between people and place over time. ...It is inevitable and appropriate that this unique landscape will continue to change and develop but it is important that this is done in a way that conserves and enhances its special qualities. Under Section 85 of the Countryside and Rights of Way Act 2000, the Council has a duty to have</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed</p>

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	<p>regard to the primary purpose of designation ... in a manner commensurate with its statutory status." WBC is reminded of this requirement; it is duty bound to protect the AONB. The provision of a country park, or a 25m buffer zone, or the measurement of sight lines from the valley floor is, quite simply, completely inadequate. Instead, the proposal considers AONB protection to involve massive traffic increases on rural roads, increased noise and pollution, removal of boundary habitats and hunting grounds for local species, and the complete eradication of dark skies.</p> <p>SP2 states "Development will respond positively to the local context, conserving and enhancing local distinctiveness, sense of place and setting of the AONB. The strong sense of remoteness, tranquility and dark night skies.... should be preserved. The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals." The AONB would clearly be adversely affected by the proposal; whilst a wood boundary might prevent day time visibility, urban lights would blight the dark skies within the AONB that WBC is charged to protect. Setting and remoteness would be completely lost given the dramatic increase in road traffic that the proposal would generate.</p> <p>Whilst the development is not within the AONB, the sentiment is still valid; "Development....in a manner commensurate with the statutory status of the AONB as a nationally valued landscape. Planning permission will be refused for major development ...the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development." It is obvious that this development by its size and proximity would have a significant detrimental effect on the AONB, and WBC is therefore beholden to discount it.</p> <p>THA20 is development within the open countryside, and Policy DC1 adds further weight to its folly. Policy DC1 states: "There will be a presumption</p>	<p>development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the</p>

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	<p>against new development outside of adopted settlement boundaries. It goes on to say: “Planning permission <b>will not be granted</b> where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.”</p> <p>9.1 states “Policy SP1 ...makes clear that only appropriate limited development in the countryside will be allowed” and is expanded in 9.2 “...land outside of settlement boundaries will be treated as open countryside where there is a presumption against new development....the conservation and enhancement of the North Wessex Downs AONB and its setting is clearly a key consideration. ... appreciation that all countryside will have some such qualities means that it needs to be protected or safeguarded. Policy DC4 states: “...In ensuring a site is available, ach for development proposals should satisfy all of the following criteria: There would be no harm to the amenity of occupants of neighbouring land and buildings.... through an unacceptable increase in pollution, including from light, Where necessary suitable mitigation measures will be put in place;”</p> <p>Obviously the neighbour of the development is the AONB, and there are no mitigations for the unacceptable increase in light pollution that the proposal would bring. As light is specified as a form of pollution, Policy DC6 is categoric: “Development which would overload available facilities and create or exacerbate problems of flooding or pollution <b>will not be permitted.</b>”</p> <p>The Thatcham Strategic Growth Study TSGS offers little assessment of the damage THA20 would cause to the AONB, apart from acknowledging that the AONB partnership has objected to it, and that there is “little intervisibility between the two if an appropriate buffer is included in any proposals.” (2.47) This hardly cover the effect the development would have on the AONB. The document goes on to say “The link with the North Wessex Downs ...is less strong” and then promotes links as a benefit for the town, with absolutely no consideration of the impact on the AONB.</p>	<p>settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p>



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	<p>WBC is well aware of the negative impact on the AONB. The Site Selection Background Paper December 2020 Table 8.2. Site CA12 (pg21) (and later CA sites) states: It is the Council’s preferred approach to allocate site THA20 as a strategic site. Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern. <b>This clearly states that by developing THA20 WBC is accepting that the separate identity of Bucklebury would be lost and there would be definite harm to the AONB setting.</b></p> <p>In short, all evidence points to the inappropriate nature of this proposal. It would have a direct and irretrievable negative impact on the AONB. WBC are charged to protect the AONB, and should reconsider the positioning of THA20 as a viable site.</p> <p><b>2. AWE Aldermaston and Burghfield (SP 4)</b> It is unacceptable for only four sentences in clause 6.22 of a 250 page document to be devoted to WBC’s decision to withdraw from the proposal to build a garden town at Grazeley Green. We think it incumbent on WBC to publish the information and justify the decision to make this change. The result has caused WBC to find this alternative proposal for 2500 homes in Thatcham which has evidentially been rushed and poorly thought through. It would seem that Reading Borough Council and Wokingham District Council have not taken the same view. It is interesting to note that the press announcement was made on 11th December 2020 about the possible withdrawal over concerns from a nuclear energy emergency and a change to the DEPZ, the same day as this consultation commenced. WBC was working on alternatives long before any public awareness of problems with the Grazeley site and changes to the DEPZ.</p> <p><b>3. Climate Change (SP 5)</b> WBC have included addressing Climate change as a major objective. This is further developed in Policy SP5. However, it is noted that whilst “the</p>	<p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (Policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West</li> </ul>

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	<p>principles of climate change mitigation and adaptation will be embedded into new development...” (SP5), development only ‘should’ contribute to WBC’s carbon targets. Development “will be expected” to contribute positively to carbon reduction, the plan contained in Thatcham Strategic Growth Study Stage 3 was extremely limited in the coverage of carbon neutrality and the effects of Climate Change.</p> <p>Given the scale of the development, the proposal should be expected to fully comply with the requirements of SP5. The Thatcham Stage 3 document is very sketchy on this area, and only seemed to note the inability of WBC to “... to force this in detailed building regulations.”</p> <p>Policy SP17 states that the proposed site will be expected to deliver “on site renewable energy to assist in the delivery of a carbon neutral development.” Policy DC3, 3.A requires a minimum provision of 20% energy from renewable sources. Policy DC3, 3.B states that WBC will support renewable energy applications if they are suitable for the area, are accompanied by a landscape assessment, and cause no harm to residential amenity. Given that any form of required renewable energy generation will have a highly detrimental effect on local amenity, the proposal fundamentally fails to address this requirement. There is no mention of this in the Thatcham Stage 3 document.</p> <p>Policy SP5 requires developments to provide for “...sustainable forms of vehicular and personal transport...” Given the inadequacy of the transport plan included in the proposal, it is felt that this requirement is far from being met. Thatcham’s roads are already often gridlocked at peak times , the railway station and services inadequate, and people are unlikely to walk into the town centre further applying pressure to local roads. Local schools will increase traffic pressures, and rat running onto inefficient roads will be prevalent. All of this increases carbon generation, rather than reduce it. The proposal allocates two bullet points to “Net Zero Carbon Development” and again is woefully inadequate in this area. Fundamentally, the plan fails to address the detail of how it would meet WBC’s Climate Change requirements.</p>	<p>Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</p> <ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess</p>

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	<p><b>4. Flood Risk (SP 6)</b> The proposal fails to meet with WBC specifications regarding Flood Risk. Policy SP6 states that:</p> <ul style="list-style-type: none"> <li>-“Development within areas of flood risk from any source of flooding, including Critical Drainage Areas and areas with a history of fluvial, groundwater or surface water flooding will only be accepted if it is demonstrated that it is appropriate at that location, and there are no suitable and available sites at a lower flood risk.”</li> <li>- “Mitigation measures should be considered as a last resort to address flood risk issues....</li> <li>- Development will only be permitted if it can be demonstrated that: ....it is demonstrated that the benefits of the development to the community outweigh the risk of flooding It would not have a detrimental impact on the flow of fluvial flood water, surface water or obstruct the run off of water due to high levels of groundwater.”</li> <li>- “When development has to be located in flood risk areas: It will be safe and not increase flood risk elsewhere;”</li> </ul> <p>5.9“...This policy aims to achieve a planning solution to flood risk management wherever possible, steering vulnerable development away from areas affected by flooding.”</p> <p>5.13 “The NPPF directs development away from areas that are liable to flood....”</p> <p>Flood risk is a significant threat to Thatcham, and so, by interpretation of WBC’s own SP6, development at Thatcham NE is not appropriate. There are available sites at lower flood risk, and so the “and” requirement is not met. Mitigations <b>may</b> be possible, but they are a last resort, and the site will increase flood risk in the town. By WBC’s own requirements, THA20 is an inappropriate site. Also, DC6 states that: “Development which would overload available facilities and create or exacerbate problems of flooding or pollution <b>will not be permitted.</b>” There can be no doubt that the introduction of 2,500 houses and associated infrastructure will exacerbate problems. Both DC6 and SP6 point to the inappropriate nature of this site. TSGS even reinforces these arguments:</p> <p>-2.48 “Flood risk and surface water drainage is a key</p>	<p>the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>

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	<p>consideration...particularly so within the town of Thatcham where extensive surface water flooding was experienced in 2007.”</p> <p>-2.51 “There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling”</p> <p>-2.52 “The extent of surface water risk to the site is highest at the north western end of the site, known as Dunston Park”</p> <p>-Box 4.2 “An essential issue to address for development at North East Thatcham is the management of surface water runoff.”</p> <p>-4.8 “Management of surface water drainage is a key concern for development on the slopes above Thatcham”</p> <p>Furthermore:</p> <p>- For a development of this size it is clear that the flood risk to the site and subsequent impact on flood risk to the downstream areas of Thatcham (designated as nationally significant ‘Flood Risk Area for surface water flood risk within the 2018 Environment Agency Preliminary Flood Risk Assessment have not been considered. The LP references the Strategic Flood Risk Assessment ( SFRA for how flood risk will be assessed for this proposal, however there is very little mention of this proposal and no known local plan site screening has been published for this proposal in the 2020 review.</p> <p>-The SFRA also states that ‘Areas at risk from surface water or locations at risk of groundwater emergence should be protected from development to ensure flow routes are not blocked.’ As outlined in the SFRA this proposal site is under lain by clay and therefore is highly susceptible to groundwater emergence. The areas downstream of the site are identified as at high risk of surface water flooding. If this development were to go ahead it would contradict what it outlined in the supporting SFRA.</p> <p>-As per the National Planning Policy, priority should be given to sustainable drainage. In the LP there is no evidence in the plans proposed of where SuDS will be placed within the development area. As it states within the West Berks SFRA, ‘flood risk should be considered at an early stage in deciding the layout and design of a site to provide an opportunity to reduce flood risk within a development ’. It is clear that this has not happened.</p>	<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The NPPF (2021) defines green infrastructure as ‘a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity’. The Council views green infrastructure as integral to successful place-making and that the network is planned, designed and managed to: promote healthier living; lessen the impacts of climate change; improve air quality and water quality; encourage walking, cycling, horse riding and other recreational and sensory experiences; store carbon; and improve biodiversity and ecological resilience. The GI policy has been amended to strengthen West Berkshire’s position in delivering GI through the introduction of GI standards and placing more emphasis on blue spaces too.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p>- The LP states on page 64 that the proposal will incorporate Surface water management approaches that could deliver net gain for Thatcham town. There is no justification for this statement or any evidence provided to substantiate this claim.</p> <p>-From the initial look of the LP document it seems clear that flood risk for THA20 and the subsequent impact of flood risk to Thatcham has not been considered as it does not reference the TSGS study. For full transparency the information included within the TSGS is included or at least referenced within the LP to provide evidence to claims made in the LP with regard to flood risk.</p> <p>- The site of THA20 is currently a greenfield site and the development will be subject to meeting the greenfield runoff rate. WBC state new developments must limit runoff to below greenfield conditions. It is especially important at this site that the runoff rates are not under predicted. It should be noted that there are a number of factors not taken into account in the national greenfield runoff rate figure which can result in under prediction of runoff rates from a site. These include the vegetated land characteristics e.g. grassland, woodland, farmed land and the gradient of the site. Both of these are key to this proposal due to the elevation of the land proposed for development and the removal of trees which currently intercept flows of both surface and ground water. An increase in flood risk to an area that is already identified as a nationally significant flood risk area for surface water flood risk is unacceptable.</p> <p>Whilst flooding of Thatcham does not have a direct physical impact on Bucklebury Parish, to not refer to obvious shortfalls in the proposal in this regard would be remiss of BPC.</p> <p><b>5. Design Principles (SP 7)</b> Quality Development is a WBC strategic objective, which is expanded in Policy SP7. The proposal fails to describe how it will meet its WBC's objectives, mainly because it does fail to achieve WBC's stated objectives. For example, developments are expected to "...conserve...and enhance the character, appearance...of an area," "enhance the landscape character," and "contribute to local distinctiveness and sense of place." Developments should be "...sympathetic to its setting...night and day visibility...." This</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>SP17 will be amended to include ecological networks to support climate resilience and reduce habitat fragmentation.</p>

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	<p>proposal will further destroy any chance of dark skies and will be highly visible and intrusive from the rural areas surrounding it.</p> <p>(5.27) “New development should begin with an understanding of an area’s existing character and context “...Development should complement and enhance existing areas ...to reinforce local identity and to create a sense of place ...contributes to the character of an area...” The proposal will take rural farmland and turn it into an overwhelming urban area. This is not sympathetic development, but riding roughshod over the very characteristics that elevate West Berkshire.</p> <p>Thatcham Stage 3 (4.5) “...Thatcham has few examples of hillside development, and ...is fundamentally a linear settlement, built along the Kennet Valley...” The proposal builds up into the hills and fundamentally goes away from development that enhances the local area.</p> <p>It should be noted that WBC has a predisposition for not building into the countryside. This development will require the breaching of the Thatcham settlement boundary. As quoted in the Thatcham Stage 3 document, key principles of the WB LCA are:</p> <ul style="list-style-type: none"> <li>- Conserve and strengthen existing boundary elements</li> <li>- Retain the distinction between and individual identity of settlements</li> <li>- Conserve elements that mark a transition between settlement and countryside (eg Floral Way)</li> </ul> <p>It would appear that any amendment of the Settlement boundary to allow the development at Thatcham NE will have broken at least two of those principles.</p> <p>The proposal aims to produce 3 linked villages. This design philosophy goes against the often stated West Berkshire (including in the LCA) landscape characteristic of distinct villages, with a quantifiable gap between them. Addressing this issue in a way that is sympathetic to the local area will generate other problems (eg transport), that all point to the inadequacy of the basic plan.</p> <p><b>6.Landscape Assessment (SP 8)</b> Inadequate landscape assessment and use of higher grade agricultural land.</p>	<p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the</p>

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	<ul style="list-style-type: none"> <li>• Any landscape assessment would not conclude a series of estates of new houses totalling 2500 between Upper Bucklebury and Thatcham was appropriate in terms of location, scale and design to the existing landscape. It would not enhance either the diversity or local distinctiveness of the landscape.</li> <li>• The proposed development is contrary to Bucklebury Vision, the Parish Design Statement, which states at 3G2 that the natural beauty of the landscape, visual quality and amenity of the area should be conserved and enhanced.</li> <li>• Building on some of the best and most versatile agricultural land goes against WBC's policy of focusing development on brownfield sites and low grade agricultural land.</li> <li>• In contrast to the rest of Thatcham, there is very little flat land within the site, and some areas of the site close to the northern edges have steep gradients which would be difficult to develop effectively without significant earth movement. Low gradient land is concentrated at the southern edge along the A4, although almost no parts of the site are below 2% gradient. Flat land in the north western part of the site is predominantly covered by a recently constructed surface water attenuation pond. The low gradient land at the southern edge of the site is also compromised by the presence of an oil pipeline over which no development is possible for access reasons. (TSGS)</li> <li>• A detailed skyline and impact analysis has not been undertaken, although a landscape and skyline analysis by the partnership partnership's consultants has been shared and informed this study. All proposals should be further substantiated with detailed impact assessments. (TSGS)</li> </ul> <p><b>7. Green Infrastructure (SP 10)</b> The proposal fails to meet a WBC core objective of protecting and enhancing existing landscape features and biodiversity habitats. The development would obviously require the removal of vast tracts of undeveloped green land containing mature trees and a vast hedgerow network. This would remove large areas of animal habitat, with little actual</p>	<p>available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes. The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the matters raised in regards to transportation, a response has been provided above however to reiterate a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a</p>

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	<p>detail on how this would be matched and surpassed. Thatcham Stage 3, 2.60, does state that there would be a “net gain in biodiversity,” which is difficult to see happening in practice.</p> <p>2.62 goes on to say that “All efforts to retain such distinctive landscape features (mature trees and hedgerows) and biodiversity habitats should be made.” 2.63 acknowledges the presence of protected species, priority species and priority habitat near the site, though nothing is added as to how these would be protected, and even admits that more detailed surveys are required as the information and effects are basically incomplete, and inadequate.</p> <p>Policy SP10 states: “Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment.” Removal of vast tracts of hedgerow, mature trees, the butting of the development 25m away from ancient forests will not meet this requirement in any form.</p> <p>SP10 goes on to say “Depending on their location, nature and scale, all development proposals will: protect or enhance existing GI and the functions this performs, and create additional GI...” and “help to mitigate the causes of and address the impacts of climate change through measures such as sustainable drainage, minimalizing (sic) urban heating, flood risk management, and maximise GI to sequester carbon and provide cooling and insulation functions” There are no proposals to protect existing GI, and no indications of how climate change will be addressed through carbon sequestering, urban heating reduction etc.</p> <p>While the developers’ proposal provides for a “country park” and green space, this comes at a cost to our irreplaceable natural habitat, and threat to our protected and endangered species. The site would not protect and enhance what is already there, and as such fails in the requirements of WBC Strategic Objectives and enabling policies. Instead the proposal (Thatcham Stage 3 4.53) puts forward that “The site offers the potential for significant biodiversity enhancement over its current land uses” but does not specify how these would be achieved.</p>	<p>significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>Comments regarding flooding have been addressed above.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>It is noted that there is the potential for construction to cause some disturbance during the building phase. A LPA can use planning conditions to aid construction management.</p>



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	<p><b>8. Biodiversity (SP 11)</b> BPC strongly objects to the proposed housing development which would have a catastrophic effect on biodiversity in Bucklebury and surrounding area. Many longstanding residents live here specifically for the biodiversity. <b>The following areas which abut or overlook the proposed THA20 development will suffer:</b></p> <ul style="list-style-type: none"> <li>• North Wessex Downs Area of Outstanding Beauty. Designated exceptional landscape whose distinctive character and natural beauty are precious enough to be <b>safeguarded in the national interest.</b></li> <li>• Common land – Bucklebury Common. The Common land is unique, historical and has remained largely undisturbed through centuries, a remnant of medieval times when people relied on commons for their survival. With increased numbers of visitors during the Covid 19 crisis, and illegal use of 4 x4s, we are already struggling to prevent damage, and the proposed development would put more pressure on this precarious ecosystem.</li> <li>• Blacklands Copse – parts of which are Ancient Woodland. The ancient Parish Boundary with its ditch and bank.</li> <li>• Long Grove Copse. Ancient semi-natural woodland (OS map ref: SU56J10)</li> <li>• Big Gully. Ancient woodland (SU56J06)</li> <li>• Hartshill Copse (SU56J04) Historic environment. Record type: Monument. Late Bronze Age ironworking site. Cremation burial site and Roman ditch defined trackway.</li> <li>• The Plantation (SU56J01) – Ancient woodland.</li> </ul> <p><b>Government Habitats’ Regulations</b> Imperative Reasons of Overriding Public Interest (IROPI) where a plan or project affects a priority habitat or species. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to: fulfil the commitment made by government to maintain environmental protections; and continue to meet our international legal obligations such as The Bern* Convention, the Oslo &amp; Paris Conventions, Bonn &amp; Ramsar Conventions.</p>	<p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Other transportation matters have been considered above.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>Comments regarding settlement separation have been considered above.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to</p>

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	<p>*Wildlife &amp; Countryside Act part II Nature Conservation, Countryside (&amp; National Parks) SSSIs Natural England to notify planning authority, owner(s), occupier(s) of any of that land, &amp; Secretary of State. Also, to be specified (a) the flora, fauna or geological or physio-graphical features by reason of which land is of special interest and (b) any operations appearing to Natural England to be likely to damage that flora &amp; fauna or those features. The proposal is too close to the above listed areas.</p> <p>Special Protection and Suitable Areas of Natural Greenspace are needed to increase our biodiversity, residential development needs a greater buffer between these and AONB and Common Land in an effort to protect our local wildlife.</p> <p><b>Natural England. Wildlife and habitat conservation.</b></p> <p><b>Badgers:</b> Surveys and mitigation for development projects. Survey reports and mitigation plans are required for development projects that could affect protected species. Survey for badgers: signs of setts – development site or nearby. (Bucklebury Common has badger setts). Historical or distribution records show that badgers are active in the area or suitable habitat for sett building. You cannot translocate badgers for a development site. Badgers habitat is a mixture of woodland and open country. Territory may be as small as 30ha and up to 150ha.</p> <p><b>Bats:</b> The law: not damage or destroy a breeding or resting place, obstruct access to their resting or sheltering places. Intentionally or recklessly disturb a bat while it is in a structure or place of shelter or protection. Activities that can harm: removing ‘commuting habitats’, hedgerows, water courses, woodland. Changing or removing bats’ foraging areas. (Pipistrelle bats are regularly to be seen at Burdens Heath).</p> <p><b>Hazel dormice:</b> These protected and under threat species can be affected by: disturbance, e.g. noise and light, woodland and hedgerow management, habitat removal, clearing woodland and hedgerows, habitat fragmentation and isolation. (Dormice are known to inhabit Bucklebury Common).</p> <p><b>Birds:</b> Nightjars, woodlarks, skylarks, tree pipits and stonechats as well as common species live on the Common. Ground nesting birds are significantly affected detrimentally by the presence of dogs even on leads. Barn owls,</p>	<p>provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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	<p>tawny owls and buzzards live and nest in the woodland and hunt in the surrounding open spaces.</p> <p><b>Plants:</b> Bluebells, orchids and other plants which grow in long-undisturbed situations show us that there are many patches of ancient woodland, contributing to Bucklebury’s biodiversity. All the above species are in the AONB and Bucklebury Common. It is incumbent upon West Berkshire Council and developers to ensure all measures, studies and licences are implemented.</p> <p><b>No178 English Nature Report</b> on the effects on wildlife of artificial lighting: Nocturnal animals and birds such as barn owls are likely to be disturbed by the presence of bright illumination. As these are already under threat, this may be significant pressure on remaining populations.</p> <p>We have a ‘dark skies’ policy in Bucklebury. The proposed development would change this aspect of our lives and have a detrimental effect on biodiversity.</p> <p><b>9. Approach to Housing Delivery (SP 12)</b> The world has changed in the last 12 months. We need to re-look at the assumptions on which plans were previously based to see if they are applicable now and if they will be relevant in the future.</p> <p><b>Housing Needs</b> The local housing needs assessment requiring 520-575 dwellings pa to be built needs to be revisited in the light of changed circumstances. This target was set before the onset of the pandemic, the focus on rebalancing the economy and the UK’s exit from the EU. We are already seeing changing working practices and higher rates of unemployment. There will be lower disposable incomes for many after tax rises to pay for the huge cost of the pandemic. The housing need methodology does not take account of the loss of the Grazeley site. Taken together all these new factors are highly likely to reduce the housing need in West Berkshire and call into question the numbers of houses required in Thatcham (THA20) to satisfy that need. Furthermore, the Government published the new standard method for assessing local housing need in December 2020. This included a spreadsheet containing the indicative figures for each local authority in the country. The figure for West Berkshire is 513 dwellings per annum.</p>	

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	<p><b>Housing Supply</b> The requirement was to provide a land supply for approx. 9775 houses until 2037 now 8,721 under the December 2020 calculation. According to the consultation document 8,114 have been identified excluding the proposal for NE Thatcham (THA20).</p> <p>WBC's calculations have used approximately 114 houses per annum as windfall. If our understanding is correct, over the plan period between 2006 and 2020 there have been 2900 approved sites, some 190 per annum. WBC have estimated 140 for this plan period but reduced it by the overage of approvals outstanding from the previous plan period. This would seem to be overly cautious and pessimistic and this reduces the windfall value in the WBC forecast by approximately 400 houses.</p> <p>The estimate also adjusts down the availability of housing in the Sandford Park scheme by 1/3 and it states WBC are only expecting 1000 of 1500 home provision to be built within the plan period. Why is this adjustment necessary? If this process is about land supply for properties, there is no reason to adjust.</p> <p>Only looking at these two items potentially satisfies the shortfall in total. In addition, there is a long list of sites within the HELAA of which 122 hectares is on pre-developed land and not included for development. Why is WBC looking to use new Greenfield sites when there are clearly other options available?</p> <p>There is absolutely no need for 2,500 houses to be considered when the shortfall is a maximum of 607. There are many ways of mitigating the numbers that may be required from this development.</p> <p><b>10. Large sites allocated for Housing and mixed user development (SP 13)</b> BPC strongly objects to the inclusion of SP17 as an allocated site for development in SP13. The reasons are provided throughout this document</p>	

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	<p>but none more so than detailed in Clause 14 Siege Cross below. Here, WBC makes statements in their opposition to an application on only part of this site. The statements made by WBC then are still true now and therefore this site should not be included. The focus should not be on greenfield sites particularly where the impact on the AONB and the strategic gap between Thatcham and Upper Bucklebury is compromised and eroded to such an extent.</p> <p><b>11. Issues that impact Thatcham which will also have a detrimental effect on Bucklebury Parish (SP17)</b></p> <ul style="list-style-type: none"> <li>- <b>Traffic.</b> Congestion of traffic on the A4 and roads around it. Driving from Bucklebury down Harts Hill Road and onto Floral Way, particularly at peak times for work and to/from school will see major tailbacks as residents try to access the main roads to Thatcham, Newbury and Basingstoke. The development plan has been unsatisfactory and there is little consideration given to transport and highways, including the effect on air quality.</li> <li>- <b>Thatcham rail crossing</b> is already a problem with very long waiting times to cross the railway line and queues. This will get much worse with increased traffic.</li> <li>- <b>Parking at Thatcham station</b> is inadequate. There are already queues for parking and with a lack of public transport, people drive rather than walk, particularly in bad weather.</li> <li>- <b>Schooling.</b> Bucklebury is in the catchment area for Kennet school, which is already oversubscribed. Parishioners are concerned about the education provision being further stretched.</li> <li>- <b>Environmental impact.</b> We would see an increase in the number of walkers and visitors to Bucklebury Common. That would be difficult to manage and it would have a detrimental impact on wildlife and our environment. We would lose existing green space, views and rights of way. Footpaths up and down to the A4 would become overused and spoilt. Listed and historic buildings (Colthrop Manor and barns) and their environs would be spoilt. With so many houses nearby, we would lose the rural and village</li> </ul>	

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	<p>feel of our community if this proposed urban development in NE Thatcham goes ahead. Many have moved to this area for that rural and village lifestyle and it is enshrined in the Bucklebury Vision statement. The viability of our rural community would be lost.</p> <p>- <b>Flooding.</b> Flooding problems would be exacerbated</p> <p>- <b>Shopping and town centre.</b> There is no commitment detailed in the plan to regenerate Thatcham town centre. There would be pressure on an already busy Thatcham town centre where many Bucklebury parishioners shop at the supermarkets, pharmacies and other outlets. Previous promises of regeneration have come to nothing.</p> <p>- <b>Medical Facilities.</b> The only two surgeries which would be able to serve the proposed development are the Bucklebury Surgery at Chapel Row and the Burdwood Surgery in Thatcham. These are both full to capacity. A new facility would need to be provided immediately but how would this be manned when GPs are in such short supply?</p> <p>- <b>Lengthy proposed construction period.</b> It would be noisy and polluting for a prolonged period of years impacting the peace and quiet of Bucklebury parishioners.</p> <p><b>12. Road Traffic (SP 17, SP 22, DC8 &amp; DC33)</b>  <b>There is extreme concern amongst parishioners who have attended our briefing meetings about the magnitude and impact of the increased traffic through Upper Bucklebury and Chapel Row as a consequence of the development.</b></p> <p>The traffic assessment for this site is seen by BPC as being woefully inadequate. There is little faith in the estimates of an increase of 12% to the East and surrounding villages and 10% to the North. In particular:</p> <ul style="list-style-type: none"> <li>• This appears to take no account of traffic from the development heading through Upper Bucklebury and Cold Ash for the A34 and</li> </ul>	

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	<p>M4 West. All these additional vehicles would be passing through Upper Bucklebury.</p> <ul style="list-style-type: none"> <li>• The traffic estimate does not take any account of ‘rat running’ up Harts Hill and through the Parish to avoid the inevitable backups on Floral Way and the A4 at peak times.</li> <li>• There have been no improvements to the affected parts of the A4 in over 40 years. The A4 road is narrow in width and contains many junctions in a short stretch through the town centre. The number of roundabouts and traffic lights in Thatcham already holds up the east/west A4 traffic flow, additional ones for this development would cause more issues. Floral Way and the A4 are already backed up, and the inclusion of 2500 houses and 3 schools in close proximity is just going to produce gridlock.</li> <li>• The volume of traffic on the A4 travelling in both directions is already far more at peak times than it can actually support. The WBC traffic assessment shows that 62% of the trips from these properties will join the A4 and another 17% will either cross it or access part of it for local travel.</li> <li>• The route ‘to the north’ is even more problematic taking traffic along single carriageway roads along Burdens Heath and through the built up areas of Cold Ash and Curridge before reaching the A34.</li> <li>• Floral Way was meant to be the northern relief road around Thatcham, this proposal adds in effect yet another relief road further north adjacent to the AONB which is totally unacceptable. None of this impact has been considered in SP17.</li> </ul> <p>Any junction or roundabout on Harts Hill Road will encourage road users towards Upper Bucklebury along what is already a dangerous road. Harts Hill Road from Thatcham to Upper Bucklebury is characterised by a steep hill and multiple blind bends, all of which are relatively narrow and unlit in keeping with the proximity to AONB. Access to the proposed site MUST only be accessed from Floral Way.</p> <p>All this increased traffic through Bucklebury Parish will put children walking to school and parishioners walking on the parish roads where there are no</p>	

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	<p>pavements at further risk Data from Community Speed Watch by WBC in August 2020 (Covid-19 Impacted data during summer holiday period) shows average traffic volume in one direction through Chapel Row to be in the range of 500 to 1,400 vehicles per day and average traffic volume in one direction through Broad Lane in August 2017 (summer holiday period) to be 1,300 to 2,100 vehicles per day. The TSGS Figure 3.2 suggests a profile of National traffic in England where a peak flow of 260 cars per hour produces an average flow over the day of 100 cars per hour. Table 4.1 in the same document suggests a peak flow of 5,432 vehicles per hour of which 47% are external to the development. Combination of the above numbers presented by WBC suggests an average of 2,090 cars per hour of which 980 are external. This equates to a total of 23,500 external car movements per day. 12% of this figure equates to 2,800 additional movements per day. Doubling the current known peak data for the parish to reflect out and return journeys gives 4,200 journeys – hence at best the current traffic model suggests an increase of 67% over existing known peak levels on the main route through the parish. Concerns over additional ‘rat runners’ may make this an underestimate.</p> <p>The impact on noise, vibration and air quality from this additional traffic through the Parish has not been considered in the proposal.</p> <p>BPC working with WBC regarding Community Speed Watch have found that in August 2020 and November 2019 traffic on Harts Hill, Burdens Heath and Chapel Row exceeded Association of Chief Police Officers (ACPO) limits of 25%+ of the 30mph speed limit. The impact of existing traffic is already at a critical level for the parish.</p> <p>Bucklebury Vision, the Parish Design Statement accepted by WBC, says:</p> <ul style="list-style-type: none"> <li>• 6G1. any development which creates unacceptable levels of traffic would be resisted.</li> <li>• 6G2. the reduction of vehicular traffic in order to reduce traffic on unclassified roads is supported.</li> </ul> <p>The stated 5% traffic increase to the South probably acknowledges the reluctance to use this route because of delays at the Thatcham level crossing, a 25/40 minute wait at the Railway Crossing is not uncommon. Even without such a significant increase in Thatcham's population this route</p>	



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	<p>suffers severe congestion and improvement of this needs to be considered as part of the overall plan. A bridge over the Railway line is a clear omission from this plan as it would reduce the A4 traffic and allow access to areas of employment such as Greenham Park and Basingstoke.</p> <p>WBC has stated there will be no road improvements planned to the surrounding villages. BPC are not seeking road improvements to increase traffic flow and are looking at how traffic through the parish can be reduced in future to address the current safety concerns as currently being shared with WBC.</p> <p><i>SP22, DC8 and DC33 for rural areas state:</i></p> <ul style="list-style-type: none"> <li>• <i>SP22 – “Development that generates a transport impact will be required to mitigate any impact on local transport networks and the strategic road network.”</i></li> <li>• <i>DC8 – “To ensure it does not generate levels of traffic, parking or other environmental problems which would result in substantial harm to the character, appearance or significance of the area.”</i></li> <li>• <i>DC33 – “The redevelopment would not generate traffic of a type or amount that would result in substantial harm to local rural roads, and/or would require improvements that would adversely affect the character and nature of such roads”</i></li> <li>• <i>HELAA THA16 – “Local Highway Capacity: Unless it was improved / realigned etc., I would consider that the impact on Harts Hill Road and the Thatcham NDR would be severe. The Council's Highways Team would also be concerned regarding any increase in traffic through Upper Bucklebury.”</i></li> </ul> <p><i>HELAA THA20 – “Local Highway Capacity: This would have a very significant impact on Thatcham, the A4 and the Northern Distributor Road. To accommodate such volumes of traffic, significant improvements would be required along the NDR including many of the junctions and including the junctions onto the A4. The NDR especially would need to be widened and realigned at Heath Lane. This may not be enough. There are concerns regarding the A4 into Newbury and the A4 within Thatcham. New routes across the north of Newbury may be required to link the north of Thatcham to the A339 and M4, and feasibility of these would need to be</i></p>	

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	<p><b>13. Development in the Countryside and the ‘Strategic Gap</b></p> <p>The proposal contains numerous examples of rushed and confused thinking, where it appears that the evidence is made to fit the desired answer of a development at Thatcham. The LPR Site Selection Background Paper Para 8.11 states “ The master planning work considered all of the HELAA sites promoted in Thatcham ””, rather than considering all suitable sites within West Berkshire.</p> <p>Such a cavalier approach to trying to make the plan fit is noticeable throughout the proposal, but is spelt out quite clearly in the attitude to the Strategic Gap.</p> <p>SSBP Table 8.2. Site THA9. “There are concerns that development may reduce the open countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way. The site is a buffer to development and forms part of the open character along this side of Lower Way. There is further concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.”</p> <p>This is for a proposed HELAA development of 36 houses, situated beyond the natural and actual settlement boundary of Lower Way, and which would breach the strategic gap between Thatcham and Newbury.</p> <p>THA20 is a proposed development of 2500 houses, which would be situated beyond the natural and actual settlement boundary of Floral Way and the A4, and which would breach the strategic gap between Thatcham and Upper Bucklebury and the AONB. The proposed site is a buffer to development and forms part of the open character along this side of Floral Way and the A4. There is much local concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.</p> <p>If fair selection criteria were applied, this is what would be expected in the description of THA20. Instead, the comments for THA20 read “In contrast there are very few negative impacts that developing the site would have. have.”</p> <p>This shows how predisposed and skewed the “analysis” that WBC is undertaking is.</p>	

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	<p>Much is made of the West Berkshire characteristic of separate, defined settlements, and WBC has previously gone to great lengths to protect separate settlement identities. The Landscape Character Assessment (LCA) WH4 Detractors No 5 Decreasing separation/coalescence between settlements acknowledges: “The expansion of Thatcham and Newbury...has reduced the physical and perceptual separation between settlements...”</p> <p>LCA WH4 Landscape Strategy No 5 “Retain the distinction between and individual identity of settlements” and No 6 “Conserve elements that mark a transition between settlement and countryside” promote the requirement to maintain the “Strategic Gap”</p> <p>Policy SP3 4.34 requires that “Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in this Plan.” Development in the countryside is limited by Policy DC1 which states “There will be a presumption against new development outside of adopted settlement boundaries” and “Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB...”</p> <p>The LPR states “Policy SP1 sets out that the principle of development is acceptable inside settlement boundaries and makes clear that only appropriate limited development in the countryside will be allowed.” Section 9.2 goes on to say “...this policy makes clear that land outside of settlement boundaries will be treated as open countryside where there is a presumption against new development... In West Berkshire, the conservation and enhancement of the North Wessex Downs AONB and its setting is clearly a key consideration...”</p> <p>There are numerous quotes within policy that require development to protect the countryside between developments for its own right, but also to maintain the gap between settlements. Policy SP3 requires “The retention of the individual identity of adjacent settlements”</p>	

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	<p>The strategic gap between Bucklebury and Thatcham is an extremely important one. Bucklebury is a rural parish within the AONB, whilst its neighbour Thatcham is an urban town. Floral Way is the important boundary between them, and it should not be breached, otherwise their separate identities will be lost. Bucklebury Vision states that “local residents highly value the rural nature of the area in which they live and are keen to highly value the rural nature of the area in which they live and are keen to protect this for future generations to enjoy.</p> <p>All policies point to the requirement that these settlements should be distinctly separate, and maintain their own definite identities. This requirement for separate settlements is made even more important if the remote nature of the AONB is to be protected in accordance with national requirements.</p> <p>Unfortunately the THA20 would destroy this important feeling of separateness, with the virtual merging of a dense housing estate with the rural setting of Upper Bucklebury. Although there is a “country park ” strip between them, this is far too narrow and ultimately ineffective in maintaining the gap between the settlements. As Upper Bucklebury is lost into Thatcham, so too is the edge of the AONB.</p> <p>It is even more unfortunate that WBC already acknowledges that THA20 would destroy the identity of Upper Bucklebury, and with it part of the AONB setting.</p> <p>The LPR Site Selection Paper Table 8.2. Site CA12 (and later CA sites.) “It is the Council’s preferred approach to allocate site THA20 (Thatcham NE) as a strategic site. Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.</p>	

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	<p>This clearly states that, by developing THA20, WBC is acknowledging that the separate identity of Bucklebury will be lost. This is in direct contravention to the LCA, and various policies within the draft LPR. This would be devastating if the damage were just to the parish of Bucklebury, but the statement also acknowledges the damage to the setting of the AONB settlement pattern. WBC is charged with protecting the AONB and its setting, but appears to be pushing through a policy that it accepts will cause damage to the very thing it is meant to protect.</p> <p>The proposed development at THA20 actively goes against LPR policies to protect the separate identities of adjacent settlements, and WBC acknowledges it is ignoring its own policies in the Site Selection Paper. WBC also acknowledges that THA20 would be to the detriment of the AONB. This is one further example of how inappropriate THA20 is.</p> <p><b>14. Siege Cross</b>  Siege Cross is a constituent part of the THA20 proposal, making up one of the three proposed “linked villages.” It was the subject of developers’ plans in 20 15/16, but planning permission for around 500 houses was refused. It is puzzling that a site for 500 houses should be refused permission, given WBC now promotes it as part of a development five times bigger.  It may assist to reiterate some of the arguments WBC itself used to counter the Siege Cross proposal. The elements quoted are a selection of the multiple similar points successfully deployed in refusing the Siege Cross application.</p> <p>WBC Planning Officers put forward the following in the 15/00296/OUTMAJ West Berkshire Council’s Statement of Case:  1.2.3) Landscape and Visual Impact  “... The development would result in significant and demonstrable harm in terms of landscape character; settlement form; scale; identity and distinctiveness; and the historic environment. In particular:</p> <p>(c) The proposed development would result in harm to the character and</p>	

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	<p>identity of Thatcham and erode the open landscape between Thatcham and Upper Bucklebury.</p> <p>(d) The development would have an adverse impact on the distinctive local landscape character and appearance of the landscape north of Thatcham, which contributes to the setting of the AONB the boundary of which runs some 575 metres to the north of the site.</p> <p>(e) The development would urbanise the key areas of sensitivity within the Local Landscape Character Area 14F (Colthrop Manor Plateau Edge), including: the lower slopes of an important ridge line; Big Gully, a local landmark; good views across the area and long views across the Kennet Valley; the lack of development with scattered farmsteads and minor roads; and the rural setting of the historic settlement at Siege Cross Farm.</p> <p>(f) The development would detract from the enjoyment of the character and appearance of the AONB in views from the escarpment south of the River Kennet.”</p> <p>“...the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in terms of its location over the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development also fails to conserve the historic landscape setting and rural context of Siege Cross Farm.”</p> <p>“The development is contrary to guidance in the relevant landscape character assessments, and therefore fails to protect and enhance the local identity and distinctiveness. The development would erode the identity of Thatcham as being separate to that of the surrounding rural settlements.”</p> <p>“...the application is contrary to the National Planning Policy Framework, the Planning Practice Guidance, Policies ADPP3, ADPP5, CS14 and CS19 of the West Berkshire Core Strategy (2006 2026), the relevant landscape character assessments, the North Wessex Downs AONB Management Plan (2014 2019), and the North Wessex Downs AONB Position Statement on Setting (2012).”</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>5.4 "...the Council will highlight that the appeal site is largely undeveloped land outside of the existing defined settlement boundary and within open countryside. The Council will give evidence on the weight that should be applied to individual policies, and will demonstrate the proposed development fails to comply with the National Planning Policy Framework, Policies ADPP1, ADPP3 and CS1 of the West Berkshire Core Strategy (2006 2026), Policy HSG.1 of the West Berkshire District Local Plan 1991 2006 (Saved Policies 2007) and emerging Policy C1 of the Housing Site Allocations DPD with respect to the location of new development.</p> <p>It is notable that WBC were particularly concerned about the effect of the Siege Cross development on the wider landscape, its failure to comply with National and local policies and on the AONB which "runs some 575 metres to the north..." However, in the THA20 proposed development, WBC proposes a site that abuts the AONB, and then erroneously implies that there will be no harm to it or to the wider countryside.</p> <p>WBC's Case Officer also noted in his report on Siege Cross that:</p> <p>5.9 LANDSCAPE CHARACTER AND VISUAL IMPACT</p> <p>"One of the core planning principles of the NPPF is that planning should take account of the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside... The NPPF advises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes."</p> <p>To ensure that the detrimental impact of the Siege Cross development was given the weight it deserved in those proceedings, WBC employed a landscape expert, Bettina Kirkham DipTP BLD CMLI of Kirkham Landscape Planning to complete a landscape assessment. The result was further damning evidence of the effect of development at Siege Cross Farm:</p> <p>Landscape Assessment Summary</p> <p>"S.5 ...I set out the North Wessex Downs AONB AONB's objections to the proposed development, which I support."</p> <p>"S.7 ...the attributes of the site and its immediate setting are recognised as key features which should be conserved and enhanced in order to maintain the local character and distinctiveness of the landscape and the rural setting to Thatcham and the North Wessex Downs AONB."</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>“S.10 ...The site makes an important contribution to the setting of the AONB and to the setting of both ecological and heritage designations (Long Grove Cop se, Big Gully and Siege Cross Farm).”</p> <p>“S.11 ... it is a ‘valued’ landscape within the meaning of NPPF 109 which should be protected and enhanced... which provides acknowledged landscape benefits. The proposed development would result in significant and demonstrable harm to a valued landscape and to the intrinsic beauty and character of this landscape ...the proposed development is not environmentally sustainable contrary to NPPF para 7.”</p> <p>“S.12 ...The proposed development on the appeal site would therefore be an extensive arm into this open elevated and prominent landscape. It is clearly not a logical extension to Thatcham as it will intrude into an overwhelmingly rural landscape, which forms an intrinsic part of the wider landscape between the AONB and Thatcham, well beyond a clearly defined and established landscape boundary to the settlement.”</p> <p>“S.14 ...The value of the landscape is enhanced by the presence of historic assets in this case two Grade II listed buildings, the historic settlement of Siege Cross Farm....”</p> <p>“S.17 ... adverse effect of the development on the physical and visual setting and character of the site environment... cannot overcome the impact of the location, extent and mass and scale of the development, nor the impact on many views...consequence, the development would result in a wide range of long term major and moderate major adverse landscape and visual effects and several additional moderate adverse effects. <b>On this basis I conclude that the proposed development on the appeal site would result in significant and demonstrable harm to a valued landscape and to the intrinsic beauty and character of that landscape</b> by:</p> <ul style="list-style-type: none"> <li>• Harming the character, value and visual appearance of the site as part of the open countryside;</li> <li>• Harming the landscape and visual setting of the historic Siege Cross Farm and its Grade II listed buildings;</li> <li>• <b>Harming the setting of the North Wessex Downs Area of Outstanding Natural Beauty...</b>”</li> </ul>	



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	<p>“S.19 In conclusion, the Inspector and Secretary of State are respectfully requested to dismiss the appeal on unacceptable landscape and visual impact grounds.”</p> <p>It is abundantly clear that WBC’s own expert was categoric in the assessment of the damage that Siege Cross would cause to the local environment. This expert opinion was repeated throughout WBC’s vigorous opposition to the site. It is noted that both WBC and its expert were concerned about the harm that would be inflicted on the AONB that was half a kilometre away.</p> <p>BPC emphasise that the Siege Cross site now forms part of the THA20 proposal. However, this current proposal is 5 times the size and much closer to the AONB. The potential damage caused would be significantly greater WBC are reminded of its previous positioning regarding Siege Cross, and its vigorous defense of the countryside and the AONB. It is beholden on them to remember that previously stated position, and acknowledge the irretrievable damage that THA20 would cause to the local area and the AONB. THA20 must be recognised for what it is an irresponsible and irrevocable blight on our landscape and be discarded as a development option.</p> <p><b>15. Summary</b></p> <p>Bucklebury Parish Council has considered the strength of public opinion in the Parish against THA20. BPC OPPOSES this disproportionate development in North East Thatcham. By its own admission, WBC admits that the proposal would result in the loss of the separate identity of Bucklebury and be of harm to the AONB. Furthermore, astonishingly, WBC states that the plan has few negative aspects, but BPC’s analysis demonstrates a panoply of detrimental consequences. The strength and persuasiveness of these arguments dictate that WBC needs to undertake an urgent reappraisal of the entire plan.</p> <p>In conclusion, the proposal is disproportionately big, poorly sited and would have too great an impact on the surrounding population and environment.  <b>WE STRONGLY URGE THE PROPOSAL BE REJECTED.</b></p>	

Respondent (with lpr ref)	Response	Council Response
<p>Midgham Parish Council (lpr1330)</p>	<p>Midgham parish council wishes to strongly object to the proposed development of 2500 houses to the north and east of Thatcham. The parish would have wished to carry out a public meeting to allow members of the public to express their views but have been precluded from doing so due to COVID-19 restrictions. Nevertheless, members of the parish council have received objections from concerned constituents and the matter was discussed by the parish council on January 18 2021. The parish Council wishes to object on the following grounds.</p> <p><b>Strategic gap</b> Midgham is a small village in the countryside. It is bounded to the east by Woolhampton and to the west by Thatcham. It is essentially farmland with a small amount of housing. Woolhampton has experienced large-scale development only recently and is steadily growing in size as a village. Thatcham has developed greatly over the last 20 years and it has expanded its boundaries accordingly. There is already ribbon development on the A4 between Thatcham and Woolhampton. The planned development would abut right up to the boundary of Midgham parish and consequently Midgham would become a small village effectively sandwiched between two large conurbations. This would have a severely detrimental effect on the village as it would be in danger of being completely subsumed by those conurbations. The development would fundamentally change the rural aspect of this area.</p> <p><b>Traffic</b> Midgham would be adversely affected by a vast increase of traffic which would be generated by the new development. The A4 is the main arterial route leading to Reading and the M4 and is already very heavily used particular at peak times. This development will significantly increase the amount of traffic on the A4 and by doing so increase the level of pollution from these vehicles, both chemically and by noise. Road noise is already a significant problem. Furthermore, Thatcham station which would be the railway station serving this plan development, has a level crossing which already incurs significant tailbacks particular during peak hours. The increased traffic can only add to this.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash, Midgham and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the</p>

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	<p>Furthermore, this railway line has been electrified only recently and it is likely that more people will wish to travel by train. Any increase in train frequency will increase the delays at the level crossing.</p> <p><b>Infrastructure</b> There is already considerable pressure on local school places due to the large-scale previous developments in Thatcham and capacity for new students could be a serious problem. General medical services in the area are already stretched and are likely to have considerable difficulty in coping with the large increase in population. Whilst the A4 is a major road the roadways in and around Midgham are very narrow, devoid of pavement, and in some cases single-track. It is inevitable that due to the considerable increase in traffic and the concomitant delays, these small lanes will be used as rat runs or thoroughfares as people seek to circumnavigate traffic delays. This will be dangerous, will increase pollution, and will further destroy the countryside.</p>	<p>IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
<b>General consultation bodies</b>		
Heritage Forum (lpr78)	SP17 We believe that this site lies within the 8 km buffer boundary of the AWE Aldermaston DEPZ and OCZ (see page 28 of the Local Plan Review).	Noted. The ONR has responded to this consultation to inform the Council that the Outer Consultation Zone (OCZ) for AWE Aldermaston will be amended from 8km to 5km.
Binfield Badger Group (lpr2184)	<p><i>(comments also submitted under SP16)</i> I am writing on behalf the Binfield Badger Group, Berkshire to express concerns regarding the above local plan. We are a not-for-profit organisation formed in 1985, with a growing membership base across the county. The primary aims of our group are to protect and promote badger welfare and preserve their habitat across the whole of Berkshire.</p> <p>We provide a framework for members and supporters to help badgers, including education, talks and meetings and also conduct regular sett surveys to understand the population and health of badgers</p>	Concerns noted. Preservation of badger habitat and mitigation for their existence has and will be considered as part of the ecology evidence supporting this site.

Respondent (with lpr ref)	Response	Council Response
	<p>across Berkshire. We also work in conjunction with local authorities to review and provide input into local planning applications that might impact badger habitat and have previously provide d input to schemes in West Berkshire. Having reviewed the Local Plan consultation document we have concerns with the area and extent of the scheme for both North East Thatcham and Sandlesford Park.</p> <p>As the planning team at West Berkshire Council is aware, badgers are a protected species and any development must preserve badger habitat and mitigate for their existence, ensure they are not adversely impacted and have sufficient foraging ground that allows for territory movement and expansion. Both these schemes have badger activity across the sites and indeed we have previously objected to the Sandlesford Park development as active badger evidence was found during numerous sett surveys. We also have formal sett records that show badger activity both within the North East Thatcham proposed site and on its periphery.</p> <p>On behalf of the badger group, I would therefore like to express concern with the sites chosen for this proposed Local Plan development and ask that WBC take these concerns into account.</p>	
British Horse Society (lpr850)	The Society strongly supports A network of green infrastructure which will include a new strategic country park linking Thatcham to the plateau and the AONB Active travel improvements on routes between the site, town centre and railway station Sustainable transport through routes The Society requests that it is consulted on the need for equestrian provision in this area and the need to maintain existing public rights of way and establish new ones.	Noted.
Mid and West Berkshire Local Access Forum (lpr1863)	North East Thatcham is the largest development in the draft local plan, and it affects the largest number of public rights of way. Yet there is less detail in this policy than for some of the smallest non-strategic sites – the supporting text justifies the selection of North East Thatcham, but does not give any additional information about the nature of the development. There is no	Comments noted, the Council recognise the benefits that the public right of way network has environmentally but also alongside this they aid well-being in terms of both physical and mental health. West Berkshire Council Public Rights of Way Improvement Plan which is currently being

Respondent (with lpr ref)	Response	Council Response
	<p>mention at all of public rights of way in the policy or supporting text, and the 'Thatcham Strategic Growth Study Stage 3 Report: Thatcham Future' merely mentions their existence.</p> <p>The site is crossed by two public footpaths and one public bridleway, which provide access and circular walks from Thatcham to the extensive network of public rights of way and common land in Bucklebury and Cold Ash. MWBLAF believes that these should be preserved as distinct routes (similar to THAT/8/1 in the existing Thatcham Dunston Park estate) and not absorbed into the road network of the development (as is the case for THAT/8/3). Their rural character should be preserved, which may require the planting of new hedgerows. The policy RSA 3 has excellent wording on this point, and we recommend that equivalent wording is added to this policy.</p> <p>The Forum strongly supports the following objectives: Development of the site will be expected to deliver:</p> <ul style="list-style-type: none"> <li>• Active travel improvements on routes between the site, town centre and railway station</li> <li>• Sustainable transport through routes</li> </ul> <p>The Forum supports the sentiment of the following objective: Development of the site will be expected to deliver:</p> <ul style="list-style-type: none"> <li>• A network of green infrastructure which will include a new strategic country park linking Thatcham to the plateau and the AONB</li> </ul> <p>However, the policy needs to give further explanation is needed of what is meant by 'a network of green infrastructure' and 'a new strategic country park'. While the country park might link the new development to the 'plateau', the development risks separating the current town of Thatcham from the 'plateau'.</p> <p>Given the very large number of houses proposed for this development, the Forum would emphasise the importance of considering dog walking in the design of the settlement and country park. We address this in our comments on policies DC 2 and DC 37.</p>	<p>updated will be utilised to inform development proposals and forms part of the evidence base for the Local Plan. The Council agree that rights of way have an important role in the green infrastructure network and so will strengthen the green infrastructure policy (SP10) by adding additional wording.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Changes:</p> <p>The Forum recommends that an extra item is added to the elements that development is expected to deliver:</p> <p>Development of the site will be expected to deliver:</p> <ul style="list-style-type: none"> <li>• <b><u>The protection of the rural character of the existing Public Rights of Way across the site.</u></b> The policy needs to include an explanation of what is intended by ‘a network of green infrastructure’ and ‘a new strategic country park’.</li> </ul>	
West Berkshire Green Exchange (lpr1556)	<p>We question whether the density of housing that is suggested for Thatcham is desirable in the modern world. The benefits to health, including mental health, of more active lifestyles are well-known. The proposal in this plan will deprive the existing residents of the town of public footpaths in the north east of the town, which can be used for recreation by anyone who enjoys walking, particularly if they live in the Siege Cross estate and will increase the light pollution of this segment of Thatcham Town. We do not believe that the value of these footpaths as contributors to quality of life is taken into account in the plan.</p>	<p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.. This will be accessible to all.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p>

Respondent (with lpr ref)	Response	Council Response
<p>The Berkshire Ornithological Club and Newbury District Ornithological Club (lpr1298)</p>	<p>Response from the Berkshire Ornithological Club attached</p> <p>Response comments on the impact of proposals on local biodiversity, matters which are considered will need to be addressed to mitigate the impact of the scheme and sets out some possible means of doing so.</p> <p>Response states that in this case the site will introduce 2500 new households almost all within 2 km of Bucklebury Common, and considers that mitigating the impact of the increased recreational pressure, and the opportunity to enhance biodiversity should form part of the approved scheme, consistent with current Local Plan Policy CS17, emerging policy SP11 and NPPF paragraphs 170 and 175.</p>	<p>Comments noted, biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

Respondent (with lpr ref)	Response	Council Response
		The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.
<b>Other stakeholders</b>		
Mrs Harvey (lpr1367)	<p>From: Mrs Harvey</p> <p>I am writing to object and voice my concerns about the NE Thatcham development.</p> <p>Living in Bucklebury, I am extremely concerned about the impact of building 2500 houses will have on the surrounding area. During and after completion.</p> <p>In my view this is excessive development in 'Rural Berkshire' and far too close to AONB.</p> <p>Not only will already oversubscribed local primary and secondary schools struggle. Hospitals and Dr surgeries will suffer.</p> <p>The traffic and pollution levels will increase. This will affect humans, domestic animals and wildlife.</p> <p>Over the years we have seen other developments appear in Thatcham Berkshire. There are certainly other sites available ones much more suitable to residential purposes. These would have a less negative impact to their area. Town and country.</p> <p>Thank you for acknowledgement of this objection.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>



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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		and lifestyle choices will be important elements of the overall transport plan.
Chris Austin (lpr1374)	<p>Following our attendance at two meetings held by members of Bucklebury Parish Council and having studied the content of the various related planning documents, we write to outline our objection to the development of 2,500 homes within the North Thatcham area.</p> <p><b>Environment</b> The proposed development abuts Bucklebury Common and an AONB. Residents of the new developments will be drawn to the Common and will significantly increase the pressures already faced by the eco systems and wildlife that feature there. Parking on and around the Common is already exceeding capacity, with verges being used during peak periods. Whilst the development is relatively close, not all residents will walk to the Common, they're likely to drive.</p> <p><b>Traffic</b> Thatcham is already a bottleneck for traffic flowing through the town on the A4 between Newbury and Reading. By introducing a new road network with traffic calming, traffic lights and roundabouts, the impact on the flow of traffic will be significantly impacted.</p> <p>Reference is made to the close proximity of the potential development site, to Thatcham Railway Station. Whilst this may be true, the ability to get to the station during peak times is already near impossible by car. Whilst we appreciate an emphasis is made on sustainable travel, there is no requirement for residents within the development to embrace this, as a result cycle paths and pedestrian routes may be built, but in poor weather and dark winter months, residents will turn to their cars and further impact on an already congested road network.</p> <p>With congested roads in Thatcham, residents will seek out short cuts, this will undoubtedly introduce additional traffic to local roads and quiet lanes in</p>	<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p>Bucklebury. These roads are designed with layouts and speed limits to support local traffic only.</p> <p><b>Flood risk</b> Recent flood alleviation works to the north of Thatcham have been built to protect the houses, businesses and infrastructure in the areas most severely affected by the 2007 flooding event. Whilst SUDS are being proposed within the development to manage the outflow of surface water, they are not designed to support the heavy volume of water from such a large-scale scheme. In addition to this, SUDS will release water into the relatively new flood management system and increase the risk of flooding within Thatcham once again.</p> <p><b>Wildlife</b> The impact on local eco systems and wildlife will be significant. Whilst plans identify mitigation actions and reference sustainable developments, it is abundantly clear that the development of farmland will destroy the spaces used and occupied by wildlife. The additional footfall on the Common will also impact on the wildlife.</p> <p><b>Pollution</b> The development will generate significant levels of light (even with dark sky lighting) it will upset the life of birds and mammals; they cannot adapt and will be driven from their habitats. This light pollution will also affect the residents of Bucklebury, spoiling their night sky. The volume of homes proposed will generate pollution from carbon emissions and those associated with population density. The clean air of the Common would be a thing of the past.</p> <p><b>Rail</b> Whilst Thatcham railway station is within a reasonable distance of the proposed development, there is little or no capacity for additional cars in the car parks or on-road parking. There is no reference to the improvement of</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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	<p>infrastructure that is linked to the station, without this the already creaking system will be overwhelmed.</p> <p><b>Medical</b>            Medical services in Thatcham, Bucklebury, Cold Ask and Chapel Row are all already under pressure. Whilst new services are included in the proposed scheme, there is no obligation for services to be provided prior to the completion of housing. As such, in the intervening period, new residents from the development will expect to join surgeries already at capacity. Thatcham remains a small town that is desperate for investment. By granting planning permission for this development, the local authority is devolving its responsibilities, by placing the need to provide services and infrastructure onto developers.</p> <p>Before West Berkshire Council considers further development in Thatcham, it must first demonstrate to existing residents its commitment to invest. Without this, WBC will continue to face strong opposition to applications that see the housing numbers increase significantly.</p>	<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site</p>

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		would support the service provision and regeneration that Thatcham requires.
Margaret Neville (lpr1060)	<p>I have read the details of this proposal and I would like to strongly object to it on the following grounds:</p> <p>1a. <b>The increase in traffic</b> inevitably flowing up Harts Hill, through Broad Lane in Upper Bucklebury and on into Bradfield Southend, along Burden's Heath/The Ridge and beyond into Cold Ash will be extremely dangerous. These are narrow roads, many without pavements and the extra volume of traffic will inevitably result in accidents. One particularly dangerous bottle neck is around St Finian's School where parents are forced to park on the road and there are no pavements to walk their children to and from the school entrance. Passing drivers become held up and tempers fray. It's already an accident waiting to happen and will only become worse with increased traffic.</p> <p>Harts Hill is a narrow winding road. Larger vehicles are forced into the opposite carriage way to manoeuvre round bends and this again is very dangerous. We cannot allow so much more traffic to use it.</p> <p>Upper Bucklebury and Cold Ash already have traffic calming measures which cause regular bottle necks and these will become worse.</p> <p>It is unreasonable to suggest that drivers will use the A4 and the Thatcham ring road to access the A34 and M4 - indeed the most likely route north or west to those roads is either up Harts Hill and Burden's Heath or along Floral Way, up Cold Ash Hill, past the primary school and through the chicanes past Down House School. Either way, these are dangerous routes.</p> <p>Another route out will inevitably involve crossing the railway at the end of Pipers Way. It already regularly takes 10 to 20 minutes to get over that Level Crossing.</p> <p>1b. <b>Bucklebury Common is an AONB</b> and this development will have a severe detrimental impact on it. There are nightjars and nightingales (to name but two of the rare species) which breed in close proximity to the proposed houses. The habitats of these birds will be disturbed.</p> <p>More visitors will inevitably access the Common and whilst I know we all have the right to do so, unfortunately there are many who do not respect the delicate Eco structure of the area. Even letting a dog run freely can destroy the nests of nightjars and other ground nesting birds.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>

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	<p>In addition, there is a huge problem with joy riders going through the woods in four by fours and on motorbikes.</p> <p>I understand it is the law to provide an Environmental Impact Assessment with a plan of this scale. Please could you let me know whether this is underway or has been completed.</p> <p>These are my main objections but I would also like you to consider the following points please:</p> <ol style="list-style-type: none"> <li>2. What provision is being made for Doctors' Surgeries? Local surgeries are already overstretched and cannot cater for any more patients.</li> <li>3. Is parking going to be improved at Thatcham Station? The current car park is usually full on weekdays already (pre pandemic of course).</li> <li>4. Will there be any discussions around providing a bridge over the railway instead of the level crossing in Thatcham?</li> <li>5. What plans have been put in place for sustainable drainage? I know that Thatcham has recently had a flood relief system built but I don't know if this will cope with or even be part of the drainage for this development.</li> </ol>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Holly Sparkes (lpr1062)	<p>I'm emailing in objection to the proposed plan to build 2500 houses on the farm land between Upper Bucklebury and the A4 and floral way.</p> <p>I'm in objection for a number of reasons-</p> <p>Firstly the proposed plan will lead to over development of the area- Thatcham has become extremely over developed in recent years with housing estates popping up everywhere and I believe it's important to protect the remaining rural countryside.</p> <p>Secondly it will cause the loss of the Thatcham green belt, connecting Upper Bucklebury to Thatcham and resulting in an agglomeration of housing estates.</p> <p>And finally I'm in objection due to the increase of traffic, and noise and air pollution caused by the proposed development.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

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		<p>infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Colin Heslop (lpr1063)	<p>In my view, while development is bound to continually be applied for, this site is currently a very valuable and effective boundary between two separate and very different communities namely Thatcham and Upper Bucklebury. However given that Thatcham has been designated as a development area and this site has been chosen as the preferred location, may I suggest that, as part of the approval, the tree area, that is currently shown on the plan, should be designated as common land by either a covenant or another irrevocable medium, insuring that it is unavailable for future development of any sort. Additionally there does not appear to have been an adequate consideration as to how road traffic is going to disperse from this site.</p> <p>With the current high traffic volumes travelling through Upper Bucklebury adding additional traffic that may choose the upper route to Reading and the east from this site will make Upper Bucklebury a more serious traffic zone. Additionally the increased traffic that will be heading south inevitably over the railway and canal will bring the whole A4 and Pipers way junction to a standstill, due to the increased time the level crossing is closed, and consideration should now be given to a bridge over the railway /canal linking in with a way off the new estate south and east to ameliorate this problem. Further consideration needs to be given to the additional traffic that will be heading north for the M4/A34 junction at Chieveley, with particular attention</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process. In regards to the suggestion on trees, the scheme will be landscape led it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. It is out of the remit of the Local Plan to stipulate a covenant.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>

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	<p>to Burdens Heath and The Ridge Cold Ash, with the St Finian's Catholic school parking problems that currently exist.</p> <p>I understand that an additional secondary school is to be included in the development and I think it is important to include the other sort of facilities such as a doctor's surgery, chemists shop, post office, general stores, and a primary schooling, along with sensible bus and particularly cycle facilities, preferably prior to the bulk of the housing is completed.</p> <p>Finally, and most importantly, prior to the commencement of the development a safe route for pedestrians and cycles must be arranged between Upper Bucklebury and Thatcham as there is a strong possibility of an accident if the current situation is allowed to subsist, particularly while the building works are progressing with the inevitable increased heavy goods and plant movements. <b>This can be addressed by arranging, the prior inclusion of, footpaths and cycle paths on Harts hill, Burdens heath, and The Ridge Cold Ash.</b></p>	<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Comments on the provision of facilities on site are noted, local centres which provide local retail facilities and small-scale employment space will be provided on site as well as a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development.</p> <p>The scheme will deliver active travel improvements on routes between the site, town centre and railway station.</p>
Sandra Wilkinson (lpr1065)	<p>I have learned of this huge planned development and I am very concerned. This is a green belt area and should not be built upon. Once lost it is lost forever.</p> <p>The roads in the area are not suitable to handle the increased traffic these houses would generate.</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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	<p>Changes: Please re-consider and look for brown-field sites instead</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the</p>

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		<p>plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Rachel Powell (lpr1067)	<p>I would like to register my objection to the proposed plan to develop 2500 houses on the outskirts of Thatcham.</p> <p>More than ever recently we've been educated on the impact of development and the destruction of rural countryside on the future of our planet.</p> <p>From an environmental perspective, the prospect of building these houses would be a terrible loss of a diverse range of habitats for the wildlife around that area. There are a number of red and amber listed birds, for example, whose existence would be threatened by the loss of this habitat.</p> <p>In addition, I don't believe the infrastructure of the town of Thatcham is built to support such a massive increase in town population, and the increase of traffic would cause various issues - both from an environmental and infrastructure perspective.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant</p>

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Roger Hills (lpr1068)	<p>I wish to register our profound objections to the application to build 2,500 new residences in Thatcham. I will keep my comments as brief as possible knowing that others have taken to print in far more detail.</p> <p>The public explanation for the application is given as the urgent need to improve the infrastructure of Thatcham. However, it is the long held belief of many that the station/level crossing/parking are unfit for purpose, issues that are not addressed in the application. Too little attention has been paid to the dramatic increase in traffic and pressure on local roads and services if permission is granted; insufficient attention has also been given to safeguarding AONB considerations. Overall, I am particularly mindful of the funding issues facing the police which have received such attention recently. Finally, the development would have significant implications for future Council Tax considerations.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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		<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Nick Le Rougetel (lpr1069)	<p>I just think the local authorities intention to grant the planning of 2500 house totally out of proportion the local needs, with the government's intention of restructuring the employment and wealth of the country.</p> <p>Changes: These developments should be in the north not the overcrowded south.</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

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		<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes</p> <p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>
Heather Gassor (lpr1070)	<ol style="list-style-type: none"> <li>1. The roads cannot cope with more vehicles.</li> <li>2. If a new school is built where are the staff coming from?</li> <li>3. Not enough doctors surgeries, again if a new one is built how you can staff it?</li> <li>4. More pollution.</li> <li>5. Agricultural land should be used for agriculture.</li> <li>6. All brownfield sites should be used, including properties.</li> <li>7. What is being proposed would result in THATCHAM NEW TOWN!</li> </ol>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys</p>



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		<p>from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Staffing of schools and doctors surgeries is out of the remit of the Local Plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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		<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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		<p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The proposed allocation of sites takes account of the evidence from the HELAA and Sustainability Appraisal (SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy. Thatcham lies in the top tier of the settlement hierarchy (it is an Urban Area). Urban Areas will</p>

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		<p>be the prime focus for housing and economic development.</p> <p>The proposed strategic allocation of North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p>
Tim Hindle (lpr1071)	<p>Whilst I appreciate the need for WBC to build more houses in the county, a county that has a large AONB and an extensive floodplain, the choice of the north-eastern edge of Thatcham seems to me to be a particularly "heartless" decision. Thatcham is already a mere agglomeration of earlier such tag-on developments, developments that have been pushed forward with little or no thought of how to make them part of a thriving community with a "heart", a place with a centre, something more than a Waitrose, a needlework shop and a Costa's coffee stall. Adding another 2,500 more homes at the edge of this higgledy-piggledy place can only make it even more heartless. The heavy focus of the proposal on traffic flows suggests that the development is already being seen as a mere dormitory facility for other areas.</p> <p>Changes: Thatcham would be a better place if the 2,500 homes could be broken up into several units spread around the town's perimeter, and the money for infrastructure given over to decent development of the town's existing centre.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Melissa Neller (lpr1072)	<p>As a resident of &lt;personal information removed&gt;, I object to the building work for all those houses. I am concerned at the pressure this would put on the local doctors surgery where you already have to wait weeks sometimes for an appointment. The schools are over run (I understand I read somewhere that a new school will be build) but I still don't think it will hold enough places to cope with the demand as a new school is needed for the children already yet alone with many more this estate will bring. The public</p>	<p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>transport has been cut completely in some parts of the rural areas of west Berkshire, I'm sure this would also be an issue for people living in the houses who can't drive and need to get to the local doctors etc. We also have issues with the water and the pump that provide water to the chapel row area and I'm concerned that with this many houses it will put more demand on the water supply that we already don't have. We often have our water turned off so they can fix and maintain broken pipes, it would put pressure of that system if it was connected. There is also a huge amount of wild life in the local area, what would happen to the animals with these houses all being built on that land? The traffic is also a massive concern, when it's not covid and the lack of public transport the amount of cars on the road slows everything down from harts hill, around Francis baily school and it all backs up along joining roads. I think this would be a terrible impact on the services and residents of Bucklebury and upper Bucklebury and would thin out a lot of services that are already stretched. Please don't build more houses and out strain on the services even more, we are already so overlooked when it comes to things like doctors, public service and transport, schools, water, electricity and internet/phone services.</p>	<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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		<p>modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

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Aubrey May (lpr1073)	<p>I would like to express my concerns about the proposal to build this very large development of 2500 houses on farmland adjacent to Upper Bucklebury. I have lived in &lt;personal information removed&gt; for over sixty years, and often walk to Thatcham over the fields, should this development go ahead I will be walking through a housing estate rather than the rural countryside that I have enjoyed for many years. A development of this size needs lots of services i.e. Drainage, Hospitals, Doctors and also the railway crossing at Thatcham Station is inadequate, to name a few.</p> <p>Can West Berkshire provide the services needed for such a large development? We also have the question of traffic, pollution and the disruption the building would cause.</p> <p>For the reasons stated we are against this development going ahead.</p>	<p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected</p>

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		<p>increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Colin Prince (lpr1074)	<p>I would like to object to the development of the land between Upper Bucklebury, the A4 and Floral Way, on the grounds of :-</p> <ol style="list-style-type: none"> <li>1. Over development of the area</li> <li>2. Loss of rural countryside</li> <li>3. Increased pollution</li> <li>4. Increase of traffic. This last objection has the most impact as the traffic through Chapel Row would increase dramatically.</li> </ol>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>



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		<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local</p>

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		<p>environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Richard Mower (lpr 1077)	I would like to strongly register my objection to the proposed full development of the above sites for the following reasons.	In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the

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	<p>The Vast majority of Upper Bucklebury residents are against this development, many have already registered their objections, however many are not aware of the application or consultation as no information has been sent out by WBC. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</p> <p>It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</p> <p>It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC's own intentions.</p> <p>A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far ?</p> <p>It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ? In the NWN the following statement is attributed to Hilary Cole.</p> <p>The council's executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), said: "We are very keen to work with the local community because it's such a big proposal and development for Thatcham. "We have taken a conscious decision to do this around Thatcham so it will deliver the</p>	<p>Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme</p>

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	<p>infrastructure we need. “We feel that Thatcham is best placed to take a development of this size.”</p> <p>I have two specific issues to object to on these statements made. Firstly WBC have done very little if any to work with local residents – see above points and secondly Ms Cole’s statement infers that the decision is made, so why is so called consultation being held ?</p> <p>WBC and Thatcham councils have wasted a great deal of tax payers money in completing many surveys and writing an 800 page report, effectively making this a fait accompli, before going to consultation on the proposal.</p> <p>It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <p>This will significantly impact the freight traffic using the industry site at Thatcham It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</p> <p>It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p> <p>It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this size. The shop is also likely to suffer as the plan indicate</p>	<p>would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p>that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</p> <p>It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</p> <p>It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</p> <p>There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. When would this be built before or after the houses ? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p> <p>What impact will Brexit have on new residents to the area in that we have a large proportion of EU citizens already here, but this is likely to continue in future hence is the demand for housing still appropriate. ONS statistics show that in 2019 29% of mothers of babies born were not from the UK. Does there need for such extensive development therefore required.</p> <p>West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC%20Environmental%20Strategy%20Summary%20A4%20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC Environmental Strategy Summary A4 20.pdf?m=637141844400230000</a> WBC - Environment Strategy - with declaration of climate</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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	<p>emergency. This will not contribute with the increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and so on.</p> <p>The plan suggest the provision of a “country park”. There is no budget available for.</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (Policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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		<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services</p>

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		<p>and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Dawn Adams (lpr1080)	<p>I don't think it is an exaggeration to say I was filled with horror to learn of the plan to build a massive housing development in the NE of Thatcham through to the Bucklebury area. Is no green area safe from being concreted on? There is already terrible congestion along the A4 Bath Road and to imagine more cars turning out from huge building estates onto the main drag will just create gridlock with nobody getting anywhere faster than walking pace! It is so unsettling to buy a home in rural area and pay a premium price for that location, to then hear, that your home is under 'threat' of being swallowed up in a massive brick building jungle, of which, you would never choose to live in. There is already several new builds springing up along the A4 from Calcot/Theale right through to Newbury all adding to the stress of the area. The infrastructure is poor as it is, potholes in the road is just one example, and standards have slipped in provision for the current population, so why can it be thought a good idea to add to the problem? It is not a case of 'not in my back yard' I would want everyone, in all areas, to enjoy their green spaces, if, that is where they choose to live and make their home. The government is constantly promoting the mental health of the population of this country, by advocating that people get out into the green countryside and feel the calm of nature and open spaces, and what is happening? more and more green areas are being destroyed by building houses and industrial sites and pushing the countryside further and further away. I am afraid that the Planning Department of all councils has become the enemy of the</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just</p>



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	<p>people, a thing to be feared and suspicious of, in what disruption it is going to cause to your happiness and to your lifestyle, by, what ' sneaky' blight it has in the pipeline that very few people are ever happy about. I thought the Conservative councils were protective of the Shire counties and in keeping them 'green' in this pleasant land? Not only have we got the worry of the Coronavirus and the damage this is doing to the country but now we are under attack of being further stressed by losing what we value in this area of where we live.</p> <p>Please accept this email as a strong and heartfelt objection to the Planning of the Development of housing in this area.</p>	<p>changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thattham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thattham to the AONB.'</p>
Laura Vat (lpr1082)	<p>I would like to hereby record my strenuous objection to the proposed development in Thattham of 2500 houses.</p> <p>The main reasons for this objection are as follows:</p> <ol style="list-style-type: none"> <li>1. Overdevelopment of the area</li> <li>2. The associated impact of increased traffic in an area which already struggles with traffic issues</li> <li>3. The associated impact of increased pollution</li> <li>4. Loss of countryside</li> <li>5. Loss of Thattham green belt</li> </ol>	<p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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	<ul style="list-style-type: none"> <li>6. Inadequate school provision</li> <li>7. Inadequate medical provision</li> </ul>	<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>

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		<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>
Jeremy Lutterloch (lpr4)	Having read through the proposed plans, I have to say that whilst I am fully in favour of growth throughout the county and indeed the country, I am a little disappointed that these plans do not provide for a two way road bridge over the GWR railway, Kennet and Avon Canal and the River Kennet from North Thatcham to South Thatcham. I am sure that if the developer were to have included a road bridge within their plans then they would meet with much less opposition from residents in and around the area. Most of the residents of the proposed site would need to be either employed and/or educated. Thatcham is not a high density employment area. I would suggest	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural

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	<p>that Reading, Newbury, Swindon and Basingstoke are the main centres for local employment with London providing further employment for commuters via the GWR Railway. The impact on both productivity and the environment by not providing a road bridge over the railway, canal and river will be disastrous. Productivity will be improved if a bridge is built because residents will not be delayed by the level crossing. The environment would benefit because vehicles will not be waiting, engines idling, at the level crossing. The proposed development could add a further 40+ more cars to the already long level crossing wait. With a minimum 4 intercity trains an hour travelling East or West plus 3 local trains an hour and daily freight trains, the waiting queues of traffic at the level crossing would be catastrophic to both the environment and the mental health of commuters. Have the local council and/or the proposal developers of the site been asked to put forward their plans on this particularly difficult issue of transportation? I understand that there have been proposals for a road bridge previously put forward to the east of Thatcham without success.</p> <p>Change proposed: The development itself is probably acceptable but a Road Bridge is an absolute necessity if these plans are to be approved I have lived in Thatcham and Newbury for the last 55 years and whilst I believe that Thatcham needs further housing and employment I do believe that it is imperative the Road Bridge be built across the railway, the river and the canal if any new residential building developments are to be approved.</p>	<p>routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Mark Chance (lpr7)	<p>The existing town centre and services in Thatcham do not have the facilities to support such a large development. This will drive more journeys to Newbury, Basingstoke, Reading and beyond for recreational and commuting on a transportation links which will not have capacity.</p> <p>Change proposed: The local services and town centre facilities need to be scaled up to support the current scale of housing around Thatcham. Improve North/South routes through Newbury/Thatcham, as there are limited options to cross the railway line or Kennet &amp; Avon canal. Thatcham Train crossing needs a bridge. The</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	A4 in its current capacity will struggle with the additional traffic coming from 2,500 dwellings heading into Newbury and onto the A339 and other road links.	
Pauline Cload (lpr9)	<p>I generally oppose this huge and extensive expansion of Thatcham, for a number of reasons - see below. 1. This is a massive and totally out of proportion proposal and would radically alter Thatcham, turning it much more into an urban sprawling town, losing its ancient village feel and drastically cutting current residents off from the surrounding countryside. The proposed building styles and densities would also be out of keeping, making the town lose its individual character, homogenous little boxes are an eye sore at this scale. 2. There are insufficient school places, shops, medical services etc to support such a huge increase in housing and population. 3. In a similar way infrastructure such as gas, water, sewerage, power are all inadequate to cope - there are already large parts of this proposed area and adjacent lands, that have brownouts, no access to mains sewerage or are totally reliant on oil for heating. Similar there are areas where mobile and internet signals are desperately poor, so adding more pressure to these is untenable. 4. Such a large series of developments would have significant and detrimental impacts on local wildlife, green spaces, trees, hedgerows etc and would risk significant changes to water management water with attendant risks of flooding for residents of Thatcham especially those on already established flood risk areas in the valley floor. 5. The roads in the area could not cope with increased traffic. The A4 is already often congested and slow through Thatcham. Travel south is heavily restricted by the railway, river and canal. Traffic from this development would be forced north onto small rural village roads such as Cold Ash Hill/Hermitage road/Red Shute and similar roads up through Bucklebury, Midgeham etc. These roads, which are often steep narrow - are totally incapable of dealing with those levels of traffic and would blight them with pollution and disturbance as people attempt to get onto the equally congested A34 / M4. It is also notable that this would be damaging to the AONB. 5. I cannot see how this proposal is in any way compatible with aims to become net zero carbon, Besides the building works, the loss of green space, the vast increase in population, the</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>traffic generated and the proposal for a wood burning power station are all very much not 'green' or in line with stated claims to reduce carbon footprint of West Berkshire.</p> <p>Change proposed: Housing should be in the scale and proportion to the existing towns, with an emphasis on smaller developments that do not swamp swathes of the countryside. More use of Brown-field sites and sites where there is already suitable access to transport and socially needed services. (or these should be properly accounted for in any expansion rather than relying on inadequate existing services. Green buffers between rural villages and towns need to be maintained and not built over wholesale or nibbled away.</p>	<p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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		<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



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		<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several</p>

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		<p>sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Lynn Hayter (lpr15)	<p>Thatcham does not need to grow any bigger. It does not need another housing development and especially one of this magnitude, and it would be very detrimental to the town and its residents on all fronts. Thatcham does need to retain the very few open and green areas that it has, it cannot afford to lose any more open countryside. The suggestion that massive housing development of this nature would lead to improved infrastructure and facilities for the town is used every time the district council wants to place big housing developments in Thatcham rather than in other parts of the district. Such improvements never materialise. The same is usually true of the social housing aspect of such developments, which usually disappears when the developers say that it is uneconomical for them to build. The site is within the OCZ AWE Aldermaston 8km Buffer. It is completely wrong to place up to 2500 homes in such an area, when there are plenty of other places in the district where they could be built.</p> <p>Change proposed: New housing allocation for the district would be better placed in more rural areas, to enable small villages to retain enough population to keep a few retail businesses alive. This would help to allow real communities to develop instead of barren groups of just a few very large properties. I believe that almost every person would jump at the opportunity to live in a real community around a village green, with a church, primary school, post office/shop &amp; a pub. Housing development should be for the benefit of the eventual occupants, not to suit the profit requirements of the developers.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be</p>

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		<p>important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
David Bridle (lpr21)	<p>Lack of commitment to enhance any adjacent existing estates for residents. The Thatcham North East allocation would need to address / mitigate the following existing and subsequent adverse impacts. There is surely great opportunity to redress some of these issues as opposed to a focus on the new site itself: 1. Telecommunications Infrastructure - already telecommunications infrastructure (e.g. mobile phone signal strength is relatively poor for a 'town'. Additional 4G &amp; 5G masts with good coverage are required. 2. Traffic volumes &amp; road safety especially outside schools! Already existing poor provision of effective vehicle speed reduction measures outside high risk sites/routes such as North Thatcham Children's Centre &amp; Park Primary on Park Lane (RG18 3BZ). Narrow pavement, no automated vehicle speed/warning signage or speed camera, no safe crossing points, ineffective speed pillows. All such roads needs to be 20MPH to change driver behaviour. (There is reference in SP other policies that new developments should not have adverse effect on the health and safety of existing communities). Higher volumes on these high risk routes will create an adverse impact. 3. The development needs to provide adequate on site children's services/centre and not increase the numbers using the existing North Thatcham Children's Centre where there is already high pedestrian/vehicle conflict/risk. No mention of this or a new doctors surgery</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant</p>

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	<p>also required to avoid approx. 4000+ people having to travel through local roads to the Main A4 surgery further compounding traffic and road safety issues for local residents. 4. Construction Traffic Management plans (working with West Berks Highways) should be effective in preventing use by construction traffic of nearby residential through roads such as Park Lane. 5. Emergency Services and associated indirect noise impact - Thatcham Central and North residents already have to tolerate almost constant siren noise from predominantly ambulances using A4 to get to the Reading Hospital. Ambulances from Newbury station (the West) should use the Northern ring road to access this new development as it has the higher 40mph limit and should be facilitate faster access in and out to the Reading Hospital instead of trying to navigate an already congested Thatcham Town centre A4 bottleneck. Have SC Ambulance Service been consulted and what are their response plans re access? 6. Housing provision - affordable and social rented housing. Thatcham North already has an over-concentration of 'affordable and especially social' housing - refer to National Indices of Deprivation maps, Sovereign Housing Association maps, and house price maps for West Berkshire (e.g. Park Avenue Estate and Sagecroft Estate). There should be a balance/mix of housing provision across West Berkshire and Thatcham's already high concentration of such housing should not be compounded by additional provision of low quality / social / affordable housing - the mix should redress the balance by allocating a percentage that adjusts the mix to counter this overconcentration. 7. Areas of open space should have clear management and maintenance responsibilities clearly contracted and understood. There are many areas in Thatcham where land ownership is unclear and therefore such areas fall into disrepair. Any SUDS features would also come into this. 8. Leisure provision - North East Thatcham has very few (and very low quality) areas for leisure, especially for children. For example, Memorial Park, Sagecroft and Park Avenue estates have no/very poor provision. There is an over reliance on the 'Discovery centre' as a leisure destination. North Thatcham would benefit (as there are and will be a high proportion of young families) from creation of a high quality children's adventure play area opportunity for example in the Memorial Park. Where is the commitment to create a decent children's adventure play park in exiting North Thatcham and enhance the local club</p>	<p>impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>

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	<p>facilities for example tennis? Has anyone surveyed leisure provision in the existing estates in North Thatcham? Other than a skate park there is virtually nothing and very disappointing for young families moving into this area who have to trek either all the way across the town to get to the Discovery Centre or K&amp;A canal or all the way up to Cold Ash for access to woods. 9. Cycles often use public footpaths instead of local roads - better highways management and traffic calming / management to make local residential through roads/highways safer for sustainable transport. How easily will existing residents of North Thatcham estates be able to access a new 'country park' which is mentioned? 10. Thatcham would benefit from adequate provision of a small retail centre in the NE development with appropriate parking capacity where food retailers such as Lidl / Aldi (or both) can operate. Currently everyone from East, Central and North Thatcham has to travel to East Newbury, Tesco, Lidl, Aldi (for lower cost food) increasing pressure on our already congested local road network which suffers high pollution levels, especially along the A4 Town centre and residential through roads. 11. The Town centre and immediate surrounds including local 'destinations' would benefit from better (dropped kerbs and dedicated cycling paths) for walking and cycling, as well as additional (frequent) local small bus service routes. 12. Litter. Provision of more waste bins, in and around the town centre which is already dominated by takeaway provision, leading to local residents suffering from persistent rubbish along paths and streets surrounding the town centre where Thatcham Town Council do not operate regular litter picking rotas. The bins need to be in places which are calculated at certain walking distances from shops and schools. 13. Opportunity to enhance Thatcham's appearance through enhanced biodiversity - through better management and design of small park/grass areas. There are many unkempt small roadside areas which are grass which could be planted (with local residents permitted to carry out maintenance). Such areas could be removed from grass cutting contracts saving council £ as they are often hard to access with machinery. North Thatcham's Sagecroft Estate and Park Avenue estate has such areas, often uncut, covered in litter and with no locals taking responsibility to enhance their own living environments. Thank you for considering all of the above. Thatcham's</p>	<p>The routes the ambulance service takes on emergencies is not a matter for the Local Plan, the Primary Care Trust are a statutory consultee in the Local Plan process.</p> <p>Affordable housing provision and housing mix will be provided in accordance with the relevant policy contained in the LPR.</p> <p>The maintenance of any open spaces provided will be agreed as part of the planning application process. The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>Active travel improvements will be delivered on routes between the site, town centre and railway station.</p> <p>The proposal includes provision for local centres providing local retail facilities and small-scale employment space. It is out of the remit of the Local Plan to stipulate occupiers of the unit.</p> <p>Comments regarding rewinding road verges are noted.</p>

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	<p>existing estates and residents seem to have been excluded from these plans yet we are being asked to support them.</p> <p>Change proposed: Please note previous comments regarding provision of services and facilities for existing local residents. New developments should be a catalyst for enhancement of a place as a whole. Thatcham has great history and potential, however it is not demonstrating its history or potential or providing adequate services for existing residents especially in North Thatcham.</p>	
Torbjorn Hultmark (lpr60)	<p>This development will due to both its size and position be devastating to the beauty and ecology of the area. The area forms part of an outstandingly rich section of Berkshire countryside both in terms of wildlife and farming heritage. Moreover, its effect on the immediately adjoining Areas of Outstanding Natural Beauty such as Blacklands, Midgham, Bucklebury Common, the Harts Hill area and areas around Cold Ash will be considerable. This is an incredibly important area and has to be preserved. Moreover, this is in an overall area that has seen an enormous increase in housing over the past decades with Thatcham growing exponentially. Traffic, pollution and the general transport and other infrastructures are already creaking at the seams. I am seeking for this proposal to be rejected in full. Quite apart from the fact that exceptional countryside such as this has to be protected due to ecology and heritage, it has to be preserved for current and future generations' health and wellbeing.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following</p>

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		<p>developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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		modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Paula McAuley (lpr79)	<p>I am writing to OPPOSE any further development in Thatcham. I have been a resident of the town for over 40 years, been schooled here and raised my family. As you can imagine I have seen a massive increase in new build homes over this time, but very little investment in any infrastructure as admitted in your own report. My objections are as follows:-</p> <p>SEWAGE/WATER Thames Water are already struggling to cope with the current population in Thatcham, and have been served notice to clean up their act. Despite the recent flood alleviation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The new houses currently being built in Woolhampton are testimony to this, as water ran through the buildings during construction and the road was covered in sludge. The construction of the flood alleviation works ran over time and budget, and were shoddily completely to the point where the very residents who were to benefit from he works were fed-up, and formed a residents group. There is little appetite for further construction works in any form across the town.</p> <p>PUBLIC AMENITIES Our current leisure amenities are desperately underfunded, and building further amenities, in the new development offers nothing to existing residents. Our existing public right of way will be lost in the new development - we do not need "public green spaces for all to use" - we have the countryside. At present our library, toilets, youth services and leisure centre are desperately underfunded and barely accessible. Community halls struggle for bookings.</p> <p>ESSENTIAL SERVICES I have on several occasions, called the police to report anti-social behaviour, and am told there are no patrols in Thatcham tonight. 2500 additional homes will exacerbate this. We have no A&amp;E department at our local hospital, no maternity unit and waiting times for</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a</p>



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	<p>routine doctors' appointments is in some cases are 12 weeks, pre Covid. The report states a need for two primary schools, but there is no mention of a secondary school, yet 20-25% of Thatcham's children currently travel to Newbury as there aren't enough spaces. Schools struggle to recruit teachers, and we are about to close a primary school in Thatcham as no demand. ENVIRONMENT Thatcham already suffers with light pollution, the dawn chorus can be heard at 1am. The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent. Thatcham Vision found residents in favour of Brown Field development. There is no commitment to net-zero carbon mentioned in the report. Please advise where can the environmental impact study be viewed? TRANSPORT Traffic is already congested at the Floral Way and Siege Cross Roundabouts right down to the train station. The area is further congested with Francis Baily school run traffic and the new Orcas which are an accident waiting to happen. HGVs travel in these areas all day, every day, due to the distribution centres in Pipers Way the addition of more housing will make this worse. Northfield Road, Park Lane and particularly Harts Hill Road will become rat-runs to avoid these roundabout. There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters. ECONOMY It is beggars-belief that Newbury is described as being the central hub for shopping, and will continue to be so. Whoever, wrote this clearly has no knowledge of the area at all. If you live in North or East Thatcham is it almost as quick to travel to Calcot, Reading or indeed Basingstoke and the retail offerings (and parking) are far greater. To make Newbury a central hub, the housing has to be in Newbury. Thatcham has few high quality jobs, most residents are self-employed or commute. In recent years three major banks have pulled out of our High Street, and pubs are unsustainable. The Plough has closed, and The Mill House changes hands with alarming frequency. Both main supermarkets are overpriced, (compared with, for example, Tesco) the development requires 40% affordable housing people in affordable housing do not shop in Waitrose! This development does nothing more than create a dormitory town which does nothing to integrate with the existing town. Could you please provide details on how you proposed to run affordable housing schemes? The</p>	<p>'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p>

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	<p>housing association properties in the area are poorly constructed I have friends constantly on the phone to their housing association to rectify faults with windows and doors that don't close properly etc. Panorama recently spoke out <a href="https://www.bbc.co.uk/programmes/m000pk2b">https://www.bbc.co.uk/programmes/m000pk2b</a> I can't envisage any developer providing 40% affordable housing, without cutting corners it simply isn't financially viable unless there is a sting in the tail, or they reduce the percentage required. Finally, and probably most importantly, I believe the Government algorithms for calculating the housing requirement are currently under scrutiny.</p> <p><a href="https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993">https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993</a> Please advise if your current consultation is in line with this, takes the Pandemic into account and the loss of our town centres?</p> <p>Change proposed: Brownfield Sites would be a preferred option. A bridge over the railway line is essential. Nothing in this plan integrates the new development into existing parts of Thatcham - it's a whole new town. Infrastructure in Thatcham needs improving across the whole spectrum before this could proceed.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all</p>

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		<p>development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>All Local Plan Review Evidence Base documents can be viewed <a href="#">here</a>.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural</p>

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		<p>routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to affordable housing, the relevant policies are set out in the Local Plan Review.</p>
Jana Little (lpr6)	<p>The main concern I have are: - the existing infrastructure is completely inadequate to support this development. - Thatcham is under-provisioned in key services and transport, the town-centre cannot grow - There is only one major road in-and-out of the town (excluding the station crossing which is closed for up to 40 minutes in the hour), Floral Way was a relief road dimensioned for Dunston Park - not to support the traffic flow of a new estate. - Estate would have to be demonstrated to be net-zero carbon to be consistent with the West Berkshire and Thatcham Council's aspiration of 2030 net zero. None of the above points are addressed in the vision. - Wood</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>burning power plant to power the housing would also increase the carbon which is inconsistent with government requirement of reducing carbon emissions and the Council aspiration of 2030 net zero carbon emissions</p> <p>Change proposed: Finding a much more better suitable place for housing nearer to main large road network to have traffic moving. Newbury has such provisions with an access to multitude of main access points. Furthermore, Newbury has sites with power access not needing a building a wood burning power plant.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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		<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>
Nina Hopkinson (lpr25)	<p>Thattham does not have the infrastructure to support any more housing. The Town Centre is not big enough to encourage the development of shops and with Newbury being so close will never attract decent size and diverse shops. The medical practices already have a higher number of patients that is recommended and there does not appear to another Doctors Surgery in the plan. There are already to many cars for the area especially near the station - the other day it took me 25 minutes to come into Thattham from Newbury at Thattham Station. As someone who was born in Thattham when it was a village I have seen it move from a lovely village to an urban sprawl and strongly believe that Thattham has already taken the brunt of housing and it is now time to STOP!! There must be other places that could take the additional housing, however I am not convinced that there is a need for any more housing in West Berkshire.</p> <p>Change proposed:</p>	<p>Thattham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development</p>

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	<p>To not have any more housing in Thatcham! To provide the infrastructure that Thatcham disparately needs without increasing the overall size of Thatcham.</p>	<p>without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Liz Butcher (lpr110)	<p>1.Existing infrastructure is inadequate for current use and will not support the extra demands of this development. 2. Key services are already inadequate. 3. The A4 is the only major road into Thatcham East/West and is already inadequate. The level crossing in Station Road currently causes major tailbacks. The Floral Way "bypass" was created to relieve current traffic from the large Dunston Park housing development, and will be unable to cope with another 10 000 residents and their vehicles. 4. Net zero carbon levels cannot be met by 2030 as planned, and this development will make this goal completely unachievable - more cars, more heating, more concrete, more sewage. 5. If the renewable energy planned is biomass, this is problematic with poor reliability and results in woodchip having to be imported from outside the UK to provide the right quality and quantity. 6. New schools planned but may well not be needed - Parsons Down school has already been closed because of falling numbers. 7. 40% affordable housing planned - this never happens in West Berks because developers always say it is not viable when the final appeal is given. 8. Thatcham and Newbury do not need "new" country parks, this is a sop. We have plenty of green spaces for walking and cycling such as the Nature Discovery Centre, Snelsmore Common and Greenham Park.</p> <p>Change proposed:</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to</p>

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	<p>To regenerate small brownfield sites, not garden infill. It is well recognised that developers do not like these sites as they are expensive to clean up before building, but long term this makes best use of the land. I would like West Berks to liaise with housing associations to look at small developments within towns to help young families.</p>	<p>the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> </ul>



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		<ul style="list-style-type: none"> <li>Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Affordable housing will be delivered in accordance with the relevant policies contained within the LPR.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed</p>
Nigel Butcher (lpr112)	<p>1. Existing infrastructure is inadequate for current use and will not support the extra demands of this development. 2. Key services are already inadequate. 3. The A4 is the only major road into Thatcham East/West and is already inadequate. The level crossing in Station Road currently causes major tailbacks. The Floral Way "bypass" was created to relieve current traffic from the large Dunston Park housing development, and will be unable to cope with another 10 000 residents and their vehicles. 4. Net zero carbon levels cannot be met by 2030 as planned, and this development will make this goal completely unachievable - more cars, more heating, more concrete, more sewage. 5. If the renewable energy planned is biomass, this is problematic with poor reliability and results in woodchip having to be imported from outside the UK to provide the right quality and quantity. 6. New schools planned but may well not be needed - Parsons Down school</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic</p>

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	<p>has already been closed because of falling numbers. 7. 40% affordable housing planned - this never happens in West Berks because developers always say it is not viable when the final approval is given. 8. Thatcham and Newbury do not need "new" country parks, this is a sop. We have plenty of green spaces for walking and cycling such as the Nature Discovery Centre, Snelsmore Common and Greenham Park.</p> <p>Change proposed: To regenerate small brownfield sites, not garden infill. It is well recognised that developers do not like these sites as they are expensive to clean up before building, but long term this makes best use of the land. I would like West Berks to liaise with housing associations to look at small developments within towns to help young families.</p>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs</li> </ul>

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		<p>development to the most sustainable locations in the district.</p> <ul style="list-style-type: none"> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Affordable housing will be delivered in accordance with the relevant policies contained within the LPR.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed</p>
Robert Tayton (lpr239)	I have several concerns regarding the North Thatcham development. 1) The number of houses will increase the transport problems. In Upper Bucklebury there will be an increase in throughput along Broad Lane and Ridge Road. There is a primary school close by and the road is already very busy and will	Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and

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	<p>become more dangerous. Along Ridge Road there are no pavements and children unaccompanied use this road. Also the rail crossing in Thatcham is bad at the moment with very long waits sometimes. 2) Amenities - there is not enough schooling, medical availability or social amenities in the area to take the increase in population. This will cause problems social as well as medical. 3) We already have many problems on Bucklebury Common with motorbikes and 4 wheel drive cars carving up the pathways. This will increase with the increasing population. People have to live somewhere.</p> <p>Change proposed:  1) Traffic will need to be controlled to keep the speed down. It is not practical to widen roads in the A area but strict speed control across the common and along Ridge Road (long straight roads where speeding is rife) will have to be organised. The level crossing in Thatcham will need a bridge to be constructed to stop the present situation getting worse. 2) Many amenities will need to be provided. The obvious ones are medical surgery, adequate shops and schools to suit the population but you will also need to provide facilities for the youth otherwise there will be an increase in youth crime which we have seen in the past with large developments. 3) Regular policing of Bucklebury Common will be needed to stop cars and motorbikes destroying the countryside. Large fines and notices stating what will happen to people who abuse the countryside will be needed.</p>	<p>walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to</p>

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		<p>the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Colin Duff (lpr451)	<p>Any new development other than minor infill projects must be fit for the future and therefore such a large development such as this must at least be carbon neutral, preferably carbon negative. (3. Strategic objectives 1. Climate Change. Policy SP5) Developers' lack-lustre standard boxes must no longer be permissible. Such a large green field development appears not to be consistent with the stated section 2 context of West Berkshire being a rural area as it significantly erodes countryside. This proposed development is adjacent, possibly part of, an area known to have significant bronze and iron age significance. Therefore this must not be harmed (3. Strategic objectives 7. Heritage. Policy SP9) This proposed development will result in a significant increase of traffic onto the A4 potentially impeding emergency "blue light" response not only to the whole community but also for AWE. Part of the proposed development falls within AWE Aldermaston's OCZ, but much of its traffic will travel through the OCZ. (Policy SP4) This development incorporates part of Thatcham's existing flood defences (Dunston Park bund) so the protection this provides must not be harmed. (Policy SP6) This development will significantly increase the population of Thatcham and the town size and therefore must in a legally binding way be subject to a town strategic development plan, not just bolted on to the NE end of the town.</p> <p>Change proposed:</p>	<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> </ul>

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	<p>There is no doubt that more housing, especially affordable housing, is required but this development is so large it will have a major impact on the character of the area. Any new development must have a more holistic approach fo its effect on the current town and its residents. A much smaller development is preferable. Any transport statement must be part of, and be a positive contributor to, a greater strategic plan for transport around, to and from Thatcham. Not just relate to its interface with existing roads and modes of transport. Transport to and from Thatcham is predominantly on an east-west axis and this will only make this far worse. Therefore the town needs independent access north (to the M4/A34) and south (to the A339/A34) to relieve traffic on the A4 eventually heading north or south.</p>	<ul style="list-style-type: none"> <li>Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in</p>

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		<p>to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
John Parascandolo (lpr380)	I would like to strongly register my objection to the proposed full development of the above sites for the following reasons. It would effectively join Upper Bucklebury with Thatcham, effectively removing the rural aspect of the area to which I moved to. It is a massive over development of the Countryside in an area which consists of rolling hills and farmland. A previous application was rejected by the secretary of state in 2017. It will have a significant impact on traffic in the area and especially on traffic using Upper Bucklebury as a cut through to avoid the congestion on the A4 (Increased by this development) to Reading. I also do not consider the traffic modelling to be accurate. It will significantly increase the noise and light	The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the

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	<p>pollution to Upper Bucklebury. This development will increase pollution during the construction and from the increased population and traffic thereafter. West Berkshire declared a climate emergency on 2 July 2019, this development contradicts this declaration. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. The plan suggests the provision of a country park. Fortunately placed on the borders to Upper Bucklebury, (no doubt in the attempt to maintain the clause for a strong greenbelt). There are no guarantees that this will be initially included or protected from housing development later. The Lack of consultation; no information has been sent out by WBC. I therefore request that the consultation period be extended, and all residents should be formally written to ensure all local views are considered.</p> <p>Change proposed: Reduction in the number of houses and proposed area especially towards Upper Bucklebury. Traffic restrictions on Harts Hill Road. Opening of route to South by provision of a bridge over railway at Thatcham Guaranteed green belt boundary between any smaller development and Upper Bucklebury.</p>	<p>separation and identity of individual settlements will be embedded into the design process.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>



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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's</p>

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		Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.
Christopher Tocher (lpr370)	<p>The changes to both Thatcham and surrounding villages which would result from the proposed strategic site allocation would negatively affect the well-being and quality of life of existing residents so significantly, I am shocked that it has been allowed to be published for public comment and review. The bias of expansion development to the north and East of Thatcham, even spread over the time period stated, would totally overwhelm the facilities relied on by the existing community, and the proposed addition of a few specific food shops, schools and playing fields would be completely inadequate for maintaining current amenities for a town of Thatcham's size, let alone improve access and assist in Thatcham becoming a thriving market town. The reality is that Thatcham is a significant commuter town, simply observing the train station platform on any weekday morning from 6am till 9am will evidence this. The parking available at the Thatcham station is inadequate now, and there is no suitable proposal for how an additional 2500 houses worth of cars and commuters would be able to access the station realistically without degrading the access or quality of the current facility for existing residents. The current road infrastructure is already not fit for the size of Thatcham, let alone adding 2500 homes without drastic improvements. The traffic queues surrounding the train Station (in every direction) due to the level crossing when trying to access South Newbury, the A34 southbound, or the M3 via Basingstoke has been a joke for decades, and gets worse every year. The time it takes to drive through the town on the A4 is shocking, putting pressure on surrounding B roads and causing minor village roads and Thatcham estates to become rat runs during morning and evening traffic spikes. Further cars which will be inevitable from such a significant development as the one proposed, and in such a targeted area, would clearly exacerbate the issue, and the few suggestions on how the strategic site allocation would address this feel at best token, and at worst, negligent.</p> <p>Change proposed:</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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	<p>I believe that a strategic site allocation would be much more inline with both the stated West Berkshire vision and also the well-being of Thatcham and surrounding villages residents if it were seeking to spread the site allocation more evenly across the region, and not make Thatcham a sacrificial lamb to facilitate the anticipated housing needs of the county in the coming years. Any further and more proportional development of Thatcham is</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
David Griffiths-Eyton (lpr368)	<p>I object because I am very concerned about the impact that the development will have on traffic on local roads. The proposal states that there will be "travel improvements...appropriate vehicular accesses...sustainable transport through routes" but what does that really mean and when will it be delivered? That part of the A4 is already notoriously busy at peak times. Harts Hill Road is steep, winding and in need of repair. Cox's Lane is single lane and completely unsuited to any increase in traffic. The inevitable increase in waiting time to access/leave Floral Way and other routes will lead to more traffic using the roads to the north of the development to avoid the gridlock. Broad Lane / Burdens heath in Upper Bucklebury and other</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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	<p>parts of the AONB will probably bear the brunt of this, making them more dangerous. There are already sections without pavement that are used by children walking to the village primary school. In addition a development of this size will require considerable increase in the availability of local amenities, particularly schools and GP surgeries. The proposal mentions plans for primary schools and one secondary but when would the secondary start accepting pupils? Kennet School is already stretched.</p> <p>Change proposed: I understand the need for housing and the fact that the AONB, flood plains and AWE place limits on WBC's options. However to build a single development of this size in one place will cause more problems than it solves and make life a misery for the current occupants of the area for a generation. Therefore I believe the development should be significantly reduced in size, for example to only one of the three proposed sections. When deciding which of the three to take forward, much more thought should be given to the level of traffic and how to mitigate its impact on the surrounding roads.</p>	<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>

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		<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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		<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Susan Millington (lpr465)	<p>The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties, never mind additional ones.</p> <p>Change proposed: The Colthrop industrial estate should become a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for affordable and social housing.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Joe Kelly (lpr383)	<p>1. I doubt the validity of the arguments used to support the scale of proposed housing increases in West Berkshire. And my doubt is increased by the inevitable uncertainties, regarding future growth in all aspects, arising from both Brexit and the COVID-19 crisis. The long-term impact of these two major events cannot yet be properly forecast and I believe that a responsible approach to long-term planning would be to pause now and allow some passage of time (perhaps two or three years may be necessary) before making any large-scale infrastructure decisions. It would be most irresponsible for West Berkshire Council to rush ahead in this. 2. I am particularly appalled at the proposal to blight the north-east side of Thatcham and the southern border of the Bucklebury AONB with an enormous development of 2,500 houses, schools etc. This most surely makes a mockery of WBC's claimed intention to "continue to conserve and enhance the North Wessex Downs AONB" and suggests outright cynicism in its declaration that "the rural environment...adds significantly to the quality of life enjoyed by urban residents of the District and is a considerable asset for</p>	<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that</p>

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	<p>the area." Furthermore, it is criminally absurd to suggest that the roads in the vicinity of this proposed development could possibly cope with the inevitable huge increase in traffic. Even in lockdown, traffic volumes through local villages remain at a marginally unacceptable level for residents, cyclists and pedestrians. Any increase in vehicle use will increase both the level of accidents and the level of road surface wear, the latter already an issue that WBC seems unable to address adequately, due presumably to lack of funds.</p> <p>Change proposed:</p> <p>1. Await the outcome of medium-to-long-term analysis of likely future growth (in population, travel requirements, business activity, education demands) post-Brexit and post -COVID before making any plans for major housing developments in West Berkshire. This would allow time also to obtain a more intelligent view than is currently prevalent, regarding the scale of road-use reduction from increased home-working and other social factors, although it needs to be borne in mind that large-scale housing developments inevitably reduce the average age of residents in an area such as this, thereby increasing proportionately the numbers going out to school and work each day. 2. Do NOT build upon the land to the north/east/west of Thatcham's Floral Way. That road forms a very recognisable urban boundary, beyond which lies the rural beauty that is so inherent a part of West Berkshire's character and a major reason for many people living here.</p>	<p>whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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		<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Steve Davies (lpr448)	<p>I cannot find any reference to the level-crossing issue. This currently causes a lot of traffic queues at peak times and is an issue for anybody who works or shops south of Thatcham, e.g. in Basingstoke or Kingsclere. When I worked in Basingstoke it was usually necessary to divert down the A4 to Midgham/Woolhampton and then across through Tadley or Silchester. These new homes can only exacerbate the Thatcham traffic problems. Are there plans to remove the level crossing? There is also development to the south of Thatcham in Crookham which will add to the frequent traffic queues on the south side of the level crossing. There is also very limited parking around the station.</p> <p>Change proposed: Replacement of the level crossing with a bridge to the east of the station. Isolate the station and Royal Mail / industrial units by removing the current roundabout. Road would bend round to the east with a junction providing access to the station/pub/Royal Mail. Add a new roundabout providing access to the new bridge / industrial units.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>



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		packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Lauren MacKinnon (lpr472)	<p>WBC has launched the consultation just before Xmas most people I know are unaware of the consultation. It's really important that everybody in Thatcham understands its impact to have their say. I feel the consultation has not been well publicised and has been done at a time when people are busy with Christmas and Pandemic concerns. Thatcham Town Council had no visibility of the Local Plan before its publication. For years, Thatcham has been under-provisioned for basic services. This development will bring in new developer contributions' to support the people on the new estate, but those contributions will do nothing for the rest of Thatcham.</p> <p>SEWAGE/WATER Thames Water are already struggling to cope with the current population in Thatcham. Despite the recent flood alleviation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The new houses currently being built in Woolhampton had water running through the buildings during construction and the road was covered in sludge. Building more will increase the road run off and flooding risks in Thatcham. The fields and streams are already boggy/over flowing Thatcham also has a history of flooding more homes will add to this risk.</p> <p>PUBLIC AMENITIES Thatcham does not have enough doctors or other amenities for the current community, it takes several weeks to get a doctor's appointments; pharmacies always have long queues as do dentists. More homes/ people will make a broken system worse. Our existing public rights of way will be lost in the new development - we do not need public green spaces for all to use - we have the countryside. The countryside has been the main thing that has got me through lockdown, without this my mental health would have suffered greatly. The countryside is one of Thatcham's great resources, it is a meeting place for the community. Where will the children sledge, the runners, walkers and dog walkers go? Large areas of open country side make Thatcham, Thatcham. At present our library, toilets,</p>	<p>The consultation was run in accordance with the council's Statement of Community Involvement (SCI). A public consultation such as this would usually last 6 weeks but because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>youth services and leisure centre are desperately underfunded, out of date and barely accessible.</p> <p>ESSENTIAL SERVICES We have no A&amp;E department at our local hospital, no maternity unit and waiting times for routine doctors' appointments is in some cases are 12 weeks, pre Covid. What impact will there be on blue-light services that use the A4 to access Reading and Basingstoke A&amp;E hospitals? The report states a need for two primary schools, but there is no mention of a secondary school, yet 20-25% of Thatcham's children currently travel to Newbury as there aren't enough spaces. Schools struggle to recruit teachers. Therefore the development in Thatcham is ill thought out.</p> <p>ENVIRONMENT Thatcham already suffers with light pollution, The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent. The countryside is the natural boundary between these locations. The enormous detrimental impact to the natural environment surrounding Thatcham and its residents. Access to wild green space is needed, the beauty of our countryside needs to be preserved. This is of great concern and is a target of the council, how can the council meet its environmental strategy with the increase of people/ cars? Where are the tree preservation orders? There are families of deer and swifts/ starlings what provision has been made for this? Please advise where can the environmental impact study be viewed? Will existing rights-of-way in Thatcham be protected in a consistent way with other sites identified? The proposal fails to make any specific requirement for the development to be net zero carbon, which is a commitment of both West Berkshire Council and Thatcham Town Council by 2030. The A4 is an air quality management area and in 2016 the annual mean NO2 was exceeded at two sites. How can you be confident that the increase in traffic from 2,500 new houses has no adverse effect on air quality in an Air Quality Management Area? How are West Berkshire policies on Climate Change, Health &amp; Wellbeing and Water Quality going to be met by such a large scale unsustainable development. West Berkshire Council unanimously declared a Climate Emergency on 2nd July 2019. This strategy has a primary target of achieving carbon neutrality by 2030. This will not be the case with the large scale development. How with this be achieved with the influx of cars the new build with bring? 'Our environmental assets will have been protected for</p>	<p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>

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	<p>future generations.' How with this be the case with the housing plans? The strategy states the council will maintain a high quality of life for residents and the 2036 Vision, commits to continuing to support the achievement of healthy communities and positive life outcomes for every single local resident. This will not be the case for myself and other residents due to the impact on air quality and mental wellbeing the lack of countryside will offer. As the environmental strategy states the links between an active lifestyle, good air quality, access to green and blue space and health are clear, how would such a development promote and continue to deliver these benefits? TRANSPORT The environmental strategy states the aim of reducing vehicle emissions to improve local air quality. Traffic is already congested at the Floral Way and Siege Cross Roundabouts right down to the train station. The area is further congested with Francis Baily school run traffic. HGVs travel in these areas every day, due to the distribution centres in Pipers Way the addition of more housing will make this worse. This will affect the health of residents and the environment. Pot holes are already an issue. There is no provision for additional commuters at the station, bus routes are already poor and the wait at the crossing is long causing 1 km queues. These will all increase and have a detrimental effect on the environment and residents of Thatcham if the housing is developed. The transport links are full to capacity.</p> <p>ECONOMY Thatcham has few high quality jobs, most residents are self-employed or commute. In recent years three major banks have pulled out of our High Street, and pubs are unsustainable. The Plough has closed, and The Mill House changes hands regularly this shows the lack of amenities for residents, the infrastructure is poor and cannot handle more housing. This development does nothing more than create a dormitory town which does nothing to integrate with the existing town. In previous developments in Hermitage, it has been stated that they did not want to end up like Thatcham. With village amenities but with over housing. Will the plans take into account the current Pandemic? The minimum of housing should be built in the other areas mentioned below not the maximum.</p> <p>Change proposed:</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> </ul>

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	<p>Thatcham Vision found residents in favour of Brown Field development. I believe the development of brown field sites should be developed rather than new housing, as well as using empty housing stock in Newbury, Thatcham and other areas, for example more houses could be developed in Aldermaston, or north west Newbury. Burghfield/ Burghfield Common, Padworth, Greenham and Mortimer Common and Calcot areas especially have empty homes and brown field sites. The London Road Industrial Estate can take more than 500 new homes and still provide increased employment. There are other sites in need of redevelopment in Newbury where the same should be encouraged. Newbury is described as being the central hub for shopping therefore, the housing should be in Newbury.</p>	<ul style="list-style-type: none"> <li>Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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		<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p>

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		Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.
Fiona Campbell (lpr490)	<p>I do not support the proposals to build 2500 houses on land between north Thatcham and Upper Bucklebury (the Policy SP 17 "North East Thatcham Strategic Site Allocation") due to reasons given already in response to this 'event' including: the unexplored 30% allocation reduction in suitable sites for building in West Berkshire and the appalling prospect of further damage to the AONB NE of Thatcham, Bucklebury Common, the River Pang and the rural character of the area (which your plan WILL change). Bucklebury Common did not fare well during lockdown with increased people traffic and that could be taken as a trial run for increased population density. It seems likely that, despite the pandemic and current situation, employment rates are high in West Berkshire partially due to its rural character - a "considerable asset" as you say. Additionally your plan does not seem to give much mention to the increased traffic, potential flood run-off through your new build and the fact that previous 'Visions' were based on a boundary of Floral Way that this 'new Vision' (how medieval) discards. The River Pang is a chalk stream and as such is unbelievably, globally, rare and important. This LPR threatens it again.</p> <p>Change proposed: To reiterate previous comments and add my own: I hope that West Berkshire Council will: Seek a reduction from Government on the target number of homes to be built as a result of the enlargement of the DEPZs. Change your plans so that there are no new large development adjacent or almost adjacent to this or any AONB. Prioritise the entire River Pang as a conservation corridor and give it protection within your 'visions'. Describe and publish exactly what you mean by 'rural character' in 2037 (as compared with today and also 1997 - which is the year of your referenced World Commission Environment report - Our Common Future.). Link this AONB</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR</p>

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	<p>with others as further green corridors throughout West Berkshire, thus demonstrating a genuine, more far-reaching, 'vision'.</p>	<p>is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Christina Valentine (lpr512)	<p>The proposed project of 2500 new homes is simply too large, this new plan (which is notably a much larger proposal than the previously rejected Siege cross development) will rapidly change the identity of Thatcham. Sacrificing farming land and green fields in this vast scale is short sighted and not the way forward. The land is a natural wildlife habitat to species such as greater crested newts, sparrow hawks, owls to name a few. We, together with many of the current local residents have chosen to live here to enjoy the green space surrounding us. A focus on redevelopment of brownfield sites throughout the county must first be exhausted before accepting the redevelopment of green sites and even then these should be sensitively planned to blend in rather than creating an entirely new community alongside the existing under resourced town centre.</p> <p>Change proposed: Focus on smaller developments, brown field sites as a priority. We say NO to a large scale development dramatically changing our town, sacrificing our green space, farming &amp; wildlife for future generations.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for</p>



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		<p>Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>

Respondent (with lpr ref)	Response	Council Response
		<p>strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Anthony Fenn (lpr534)	<p>I object to this proposal on the following grounds: It is outside the settlement boundary established and adopted by WBC in 2017. Thatcham has multiplied five times during my lifetime and according to WBC's own study by David Lock Associates, Thatcham compares poorly with similar towns suffering from a lack of public and commercial services. Consequently WBC recognised in its 2017 Core Plan that Thatcham's infrastructure has not kept pace with its housing growth and the settlement boundary was established to protect the character of the settlement with the presumption against development outside this area and to prevent unrestricted growth into the countryside. The Core Plan concluded that due to Thatcham's rapid expansion it required a period of consolidation and there would be no significant growth. In view of WBC's own arguments I cannot support this</p>	<p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>volte-face that will destroy the character of Thatcham and put an unbearable strain on the local and surrounding infrastructure.</p> <p>Change proposed: Re-think the proposal and allocate new housing in brownfield sites throughout West Berkshire.</p>	<p>AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

Respondent (with lpr ref)	Response	Council Response
		<p>infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Charles Cairns (lpr491)	<p>This plan represents a considerable increase in the population of Thatcham and the facilities of surrounding villages. The pressure on infrastructure, which is already under strain, is considerable. Traffic: Traffic from the development accessing the A4 will put pressure on the existing link road, Floral Way, with the potential to create bottlenecks at busy roundabouts with a concomitant tail back on the link road itself. This situation will result in motorists seeking alternative routes which in turn will increase the load on roads such as Harts Hill which is a narrow road with blind corners which already carries too much traffic. The impact on the roads through Upper Bucklebury, Cold Ash (The Ridge), and Burdens Heath will be considerable. There is already considerable pressure on The Ridge at the times for School arrival and collection; this extra traffic will increase the potential for accidents. AONB: Use of the Common is already impacting on the wildlife</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic</p>

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	<p>and the flora. Increased use will result from the additional population adjacent to it. To alleviate this stress on the natural environment it is necessary for recreational facilities to be provided within the "country park" belt. Infrastructure: Should this development proceed, the provision of the additional schools, both Primary and Secondary, must be given priority and take place in the initial phase of the construction. If the schools are not built within the first two years of the development then the increase in pupil numbers will have to be borne by the already overstretched schools of Thatcham. The inclusion of the infrastructure in the outline plan are fine words; but unless translated into action in a timely manner, no more than words. The credibility the West Berkshire Council and of future projects will be destroyed if promises are not kept.</p>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be</p>

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		<p>published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>
Paul Robinson (lpr518)	<p>The proposal to essentially increase the size of Thatcham by 25% makes no sense in terms of loss of green space and increased traffic to give but two examples. However, the primary reason I object is this would overwhelm all local services, such as doctor's surgeries and schools, which, despite promises, would NOT keep up with demand - West Berks Council are repeat offenders in this respect.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity</p>

Respondent (with lpr ref)	Response	Council Response
		<p>and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Francis Baker (lpr944)	<p>I would like to OBJECT to the NE Thatcham Development of 2500 homes you are proposing as part of the Local Plan Review 2020 -2037 Emerging Draft December 2020 document By virtue of its scale, proximity and high visibility from several approaches to the AONB and the wider landscape, the proposed extension will have a significant harmful effect upon the setting, sense of remoteness, tranquillity and dark night skies of the North Wessex Downs AONB, contrary to Policy SP2 of the WBLPR and Paragraph 172 of the NPPF. The allocation is located on land forming part of the LCA WH4: Cold Ash Woodland and Heathland Mosaic Landscape Character Area as defined by the West Berkshire Landscape Character Assessment and includes land within the designated AONB. Accordingly, development of the type and scale proposed will result in the unacceptable loss of land which is of high landscape value in its own right, contrary to Policy SP8 of the WBLPR and Paragraph 170 of the NPPF. Paragraphs 1.26 and 2.24 of the Thatcham Growth Study (Stage 3) states that an objective of the Study is to avoid coalescence of settlements. However, the proposed development will significantly reduce the physical and perceived separation between Thatcham and Upper Bucklebury and an unacceptable loss of separate identity, contrary to the objectives of the Study, the AONB Management Plan, the West Berkshire Landscape Character Assessment, WBLPR Policies SP2 and SP8 and Paragraph 172 of the NPPF. The requirement for a network of green infrastructure linking Thatcham to the plateau and the AONB will result in an unacceptable increase in urban pressures on the environmental, economic and social fabric of the AONB, its communities and rural way of life, contrary to Paragraphs 91 and 172 of the NPPF. The proposed development will have an unacceptable impact on extensive areas of ancient woodland which adjoin the allocated site, contrary to Policy SP11,</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>



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	<p>Dc4 and DC14 and Paragraphs 170 and 175 of the NPPF. The strategic site allocations at Sandford and North East Thatcham are expected to deliver approx. 2,250 dwellings by 2037, which equates to nearly 50% of the total supply of dwellings to be delivered on all allocated sites over the plan period (4,670 dwellings). In light of the very real concerns about lead-in times and the deliverability of both sites, I believe there is an undue reliance on them. This has considerable potential to undermine the Council's ability to meet the housing needs of the area and maintain a 5 year housing supply over the plan period. The two sites also represent a significant component of the urban focus of the Spatial Strategy and are major contributors to the clear imbalance between urban and rural development, which is not justified by evidence and will have unacceptable consequences for the AONB, particularly with regard to meeting local housing need and maintaining vibrant and balanced communities.</p>	
Councillor Tony Vickers (lpr880)	<p>There is no evidence that the site can be delivered in a way that could be remotely called sustainable. The fact that Thatcham's infrastructure particularly transport - has not kept up with housing development over recent decades isn't something that an enlargement of the town of this scale can mitigate. This new development cannot be expected to fund the investment needed to make up for pre-existing deficiencies. We completely support the Thatcham Town Council response, which is extremely thorough. This development will not only result in considerable harm to the amenity of Thatcham residents; it will have a major impact on surrounding villages, because traffic generated by the development will use minor roads through Cold Ash, Brimpton, Bucklebury and Aldermaston to reach Basingstoke and the A34 / M4 main highways at peak times. The A4 in both directions is already congested and the traffic modelling done so far has been totally inadequate to show this. Yet the policy and its supporting text make almost no reference to traffic or highways infrastructure, apart from the meaningless phrase sustainable transport through routes. With almost no detail being presented, this proposal is evidently far more sketchy even than Sandford Park was at the equivalent stage in the last Plan preparation. If Thatcham has to take more housing, this is not where it should go. Other promoted sites may need to be looked at again but in all cases the traffic implications must be foremost. We realise that the late cancellation of Grazeley from the</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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	plans for both West Berkshire and Wokingham, which is linked to the extension of the AWE DEPZs, has put Thatcham NE in the frame. However we believe it cannot be the right solution. We wish the Council to prioritise the search for an alternative.	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Sites at North East Thatcham and Grazeley were promoted simultaneously for development as part of the call for sites. The Council's evidence indicated that both sites were potentially suitable for development subject to further work being done and masterplanning of <u>both</u> sites was undertaken. In producing the emerging draft version of the LPR, the Council took a cautious approach to development at Grazeley, assuming it would take place for the most part beyond the plan period. Development at North East Thatcham was assumed to come forward much sooner, with at least half in the plan period to 2037. Changes to the AWE Burghfield Detailed Emergency Planning Zone (DEPZ), resulted in the Council withdrawing support for development at Grazeley. This had no effect on proposed development at North East Thatcham which continues to be the Council's preferred site for new strategic development in the Local Plan Review.</p>
Patrick Bowring (lpr989)	Dear Sirs, I am all for much needed housing development, but this one is just too large and ill-thought out. There is simply not the infrastructure to	Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR),

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	<p>support it, whether schools, doctors, hospitals, roads, town centre and station parking, pubs and sport and leisure facilities. This development will increase the present 28,000 population of Thatcham by 25-30% (8-10,000 people), whilst bringing approximately 5,000 more cars on to the A4, Thatcham's congested roads and country roads, particularly at peak times, causing yet more traffic. Significantly, the A4 cycle lanes (cycling mentioned profusely in the draft) already looks to be a dismal failure. WBC should provide as a minimum the basic infrastructure first and only then put forward such a development proposal - not the cart before the horse! I have read the Q&amp;A section and was not re-assured by the answers given, particularly with regard to the Thatcham level crossing. If WBC does not prioritising the building of a bridge then the development should not go ahead. As it exists now, long queues encourage traffic delays and in consequence rat runs through narrow country lanes and villages, which cannot cope with more traffic. Then there is the West Berkshire Crematorium. The crematorium was built in 2006 to provide 'a quiet and rural setting' in the countryside, not 15 years later to be engulfed in the middle of a housing development. People's entrusted ashes have been interred/scattered within this peaceful 'rural' crematorium grounds and many living might consider it as a major betrayal or even sacrilege to build in any close proximity. The full planning permission on which the crematorium was granted might provide some insight? Besides this, no mention of the health risk of the crematorium is made. According to some statistics one cremation can emit as much carbon into the air (besides other serious toxins) as 3,500 passing cars! Does West Berkshire Crematorium use deNOx technology and what are its carbon emissions? Would any informed family buy a home and bring up their children in close proximity or down wind of a crematorium? I think not. No information is given in the draft. Nevertheless, I would support some smaller development subject to acceptable existing infrastructure in the Dunston Park area and down to siege Cross Farm, but no further along the A4 corridor. If such a development went ahead it would also totally destroy the present spectacular rural views from Greenham Common across the Kennet Valley.</p>	<p>which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

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		<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p>
Philip Teal (lpr354)	Surface Water Runoff	In relation to potential impact on surface water, all new development must include sustainable drainage measures,

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	<p>The proposed 170 hectare site is currently farmland sloping towards Floral Way and the A4 and as such this land during periods of rainfall absorbs much of this water helping to prevent the overloading of existing storm drainage systems. The Thatcham Flood Alleviation Schemes recently completed lie to the South and West of this site and therefore unlikely to fall within the catchment area of the majority of the North East Strategic Site. However, the storm waters generated by this scheme, which is far greater than other schemes already rejected for this area, from building roofs, road and hardstanding gully's etc. will need to be discharged into the existing storm sewer system. With the effects of global warming, the rainfall in the Thatcham area has been recorded as significantly increased over the past two years and this can only increase further in coming years and yet when the existing drainage systems were constructed along Floral Way some 25years ago together with connections to existing storm water systems serving other parts of Thatcham the current change in climate would not have been considered. The addition of this quantity of additional rainwater from this proposed development can only serve to surcharge the existing system to such an extent so as to significantly reduce the benefits of the Flood Alleviation Scheme. The surface water runoff from any development on this land must therefore be contained and substantial sustainable drainage schemes (SUDS) including rainwater harvesting must be incorporated as a prerequisite of any approval. Foul Water This development will undoubtedly put significant pressure on the existing foul drainage system. 2500 homes will house upwards of 7500 persons. The average foul discharge per person per day is about 150 litres which could represent a minimum 450 litres per household per day. During the peak times, especially in the morning it is possible that 25% of this discharge could occur within a 2 hour period, thereby loading the existing foul drainage system with an extra 140 cm (min) of sewage per hour from new housing stock only. Concerns must be raised as to whether the existing foul drainage will have the capacity to accept this additional future load due to issues that have already been experience with the current sewage system on the A4. Increased Traffic on the surrounding road network is already heavy especially on Floral Way during peak periods and Harts Hill is regularly used as a rat run to avoid the congestion which regularly occurs on the A4 thereby significantly increasing</p>	<p>and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>

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	<p>the vehicular movements through the villages of Upper Bucklebury and Southend Bradfield. At peak times there are already long traffic queues at the Harts Hill Road/Floral Way and Floral Way/A4 roundabouts and the proposed development will further increase traffic through Thatcham, along the A4 to Reading and through local villages to unacceptable levels. It is understood that a road access to this development is proposed onto Harts Hill Road by way of a mini roundabout which will inevitably encourage additional vehicles to use the rural routes as opposed to the main trunk roads. Every new development results in a large number of vehicle movements and in particular where green field sites are developed, substantial quantities of spoil needs to be removed. Irrespective of how much or how little of this proposed site is developed it is essential that all spoil excavated remains on site and not taken out onto public roads. During the construction of the Flood Alleviation Scheme there were significant lorry movements on Harts Hill serving the gravel quarry which made use of this road hazardous to regular road users. Not only had these traffic movements caused the road surface to deteriorate but I personally witnessed several near misses between tipper lorries and private motor vehicles. This was particularly prevalent on the sharp bends due to the inevitability of the large vehicles having to cross the centre line of the road in order to negotiate the tight turns. These tipper lorries also dragged mud out from the quarry onto Harts Hill Road making conditions even more hazardous and it is essential that any future use of this quarry MUST be severely restricted. Construction sites demand large vehicle movements throughout the construction period and therefore Thatcham will be disrupted by the proposed works for most of the 15years over which this development is planned and by the very nature of the works mud and slurry will be brought out onto Floral Way unless it is mitigated by applying strict conditions to ensure all associated road works are complete before housing is commenced and that manned raised wheel washes are incorporated through which all vehicles must pass before encroaching onto the public highway. Construction vehicles should be prohibited from using Harts Hill Road. With the ever increasing traffic movements on Harts Hill Road, as a result of this proposed development, local traffic will inevitably try to find alternative routes which can only lead to increase traffic flows through Cold Ash and along The Ridge to Burdens</p>	<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Heath, a road along which is unsuitable for a large increase in traffic flows and will cause additional safety fears for pupils attending St Finians Primary School. Healthcare The discussion document refers to additional primary schools and shopping facilities to be provided within the scheme, however there is no mention of healthcare. The nearest doctor's surgery located at the Thatcham Medical Practice on the Bath Road is already oversubscribed and has recently taken steps to relieve pressure by moving some patients to the Chapel Row and Burdwood Surgeries. Despite this and before Covid, it remained difficult to get routine appointments within 3 weeks and with additional patients coming within their catchment area this surgery will find it even more difficult to accommodate them. It is a matter of record that the NHS has an ever increasing shortage of GP's and without ensuring that additional medical facilities are provided at an early stage to serve any further Thatcham development then it would be wholly irresponsible for the Council to allow such development to proceed. There are also no NHS dentists available in the Newbury area as all books are full. These proposals will increase the Thatcham population by about 30% from its 2019 level so it therefore follows that an ever increasing Thatcham population will completely overwhelm the existing local healthcare providers with new and existing residents being unable to obtain the necessary healthcare they need. Statutory Services Whilst it is the statutory bodies responsibility to ensure that developments are provided with the necessary infrastructure, for many years the Village of Upper Bucklebury suffered from an intermittent water supply either by reduced pressure or no pressure at all but in recent months Thames Water completed the new pumping station and main to serve the village, connecting onto the existing service at the Burdens Heath crossroads. This development plan proposes housing to be constructed up the hill towards Upper Bucklebury and therefore it follows that this new main will also be required to serve at least part of the development. Concern must be raised that this will again cause supply issues to Upper Bucklebury and the surrounding area. Whilst acknowledging that there is a demand for housing in this area I cannot accept that a development of this magnitude can be anything other than detrimental to the market town of Thatcham and given my comments above I urge the Council to reconsider these proposals.</p>	<p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>

Respondent (with lpr ref)	Response	Council Response
Maud Elliker (lpr28)	<p>I've been reading with some interest the proposed mass expansion of Thatcham by 25%. As like every other region in the UK, there is growing pressure to increase housing to accommodate an over populated country. I totally understand the need for more housing, but I think this expansion is a step far too large for the area. Firstly, increasing primary schools and another secondary school is needed, but a medical practice that can cope with the extra requirements is a must. Has anyone tried to get an appointment in Thatcham recently? Secondly, yes flood defences have been built, but that mass of concrete will cause extreme environmental damage which will increase flooding risks. Thirdly, increased housing to that extent will increase pollution. This is not going in the carbon neutral direction. By reducing incredibly valuable green spaces, (nature's lungs), will increase pollution and have a diverse effect on the community. Fourthly, green belt MUST be protected. This is our heritage and what we can pass onto future generations. By reducing it by this amount will devastate wildlife, which is being eliminated at an alarming rate by humans. But if this proposal is pushed through, more by greed and profit, rather than the impact on the entire community, surely it makes far more sense to just build a new Kennet Secondary School and sports centre, and use the land formerly the Kennet School as houses. But priority for any planning committee must be to look at all brown field sites as the Government has stated that greenfield areas should not be used. I do hope all responses will be recorded for the future impact on our community.</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These</p>



Respondent (with lpr ref)	Response	Council Response
		<p>policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>'Green Belt' is a planning policy tool which aims to restrict urban sprawl. It is for local authorities to define and maintain Green Belt land in their local areas. There is no designated Green Belt land in West Berkshire.</p>
Helen Hedges (lpr37)	Representation submitted 6 January 2021 I wish to lodge an official objection to the horrendous plan to build 2500 homes in Thatcham making it	Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR),

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	<p>a flood risk, pollution risk, road risk and overall disaster to the countryside and overstretched infrastructure. Build at Theale by the Pangbourne/Theale roundabout in the wasteland there where the infrastructure will cater for this amount of people/cars and better access yet still in West Berkshire with minimal objection. Please confirm by return this official complaint is lodged opposing this ridiculous underhand proposal. Further representation submitted 29 January 2021 Please accept this as an objection to the underhand plan to put thousands if houses in beautiful rural land around Thatcham. I would strongly urge you to move this requirement to CHIEVELEY where there is plenty of land and the village needs an injection of more houses, facilities and infrastructure and perfect for the road links of the M4 and A34. I urge you to approve Chieveley as your housing development plan.</p> <p>Change proposed: Build at Theale by the Pangbourne/Theale roundabout in the wasteland there where the infrastructure will cater for this amount of people/cars and better access yet still in West Berkshire with minimal objection. I would strongly urge you to move this requirement to CHIEVELEY where there is plenty of land and the village needs an injection of more houses, facilities and infrastructure and perfect for the road links of the M4 and A34. I urge you to approve Chieveley as your housing development plan.</p>	<p>which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Name Supplied (lpr1267)	<p>Having been a fortunate resident 40+ years, the volume of houses being built in recent years, e.g. Kennet Heath 900 homes, has not been sustainable. The infrastructure in local schools, healthcare and facilities has not kept up with demand, as detailed in the plan at 6.36 However, in recent decades, the provision of social infrastructure has not kept pace with housing growth. Whilst I fully acknowledge the requirement for additional homes in West Berkshire, (especially affordable) Thatcham is, as detailed in the plan, viewed as a large village and does not have the infrastructure in place for even the current population, far from it! Indeed, the plan details at 6.19 The TSGS (Thatcham Strategic Growth) shows that Thatcham compares poorly to other similar centres in terms of overall service provision, including public services and commercial services. The town's self-image is of a large village, rather than as a thriving market town. Developments,</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy</p>

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	<p>including this one, promise of new additional schools never come to fruition Dunstan Park as well as on Kennet Heath to name examples. The plan details proposal for an additional secondary school, with Kennet School already in the East of Thatcham that is not where the School will be needed as far too close proximity. Land near the Hospital, by the Garden Centre roundabout, would be more central to the need allowing students to the West of Thatcham able to walk/cycle to school rather than travel by vehicle to secondary schools in Newbury. The plan details two primary schools, could this be clarified if this is one infant and one junior school? Existing primary schools in Thatcham are severely underfunded and understand that the intake for September 2021 means that all will have spaces resulting in again being underfunded. How does the council take into consideration declining birth rate in the community? And therefore, potential, subsequent requirement for vast amount of homes? There is no mention of pre-school facilities in the plan? Further objections: Sewage/Water Thames Water are already struggling to cope with the current population in Thatcham and have been served notice to clean up their act. Despite the recent flood alleviation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The new houses currently being built in Woolhampton are testimony to this, as water ran through the buildings during construction and the road was covered in sludge. The construction of the flood alleviation works ran over time and budget and were shoddily completely to the point where the very residents who were to benefit from the works were fed-up and formed a resident's group. There is little appetite for further construction works in any form across the town. Will drainage studies be done on existing housing estates as to assess the impact. Even with the flood alleviation works, there is a noticeable increase in surface water when we have just a few days of rain. This will of course be further exasperated with fields being built on and climate change. ( <a href="https://www.theguardian.com/uk-news/2020/feb/17/uk-must-prepare-for-more-intense-storms-climate-scientists-say">https://www.theguardian.com/uk-news/2020/feb/17/uk-must-prepare-for-more-intense-storms-climate-scientists-say</a> ) Public Amenities The report states Strategic development in Thatcham will bring considerable benefits to the town, not only in the provision of new housing, including affordable housing, but in the provision of new schools, community</p>	<p>allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's</p>

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	<p>facilities and recreational provision. Can you please provide detail as to the Community Facilities and recreational provision that would be provided as the report does not detail this and also how in future they would be funded, particularly with the existing facilities having such limited funds and rely on charitable donations. Our current leisure amenities at Kennet Leisure Centre are desperately underfunded, and building further amenities, in the new development offers nothing to existing residents. Our existing public right of way will be lost in the new development - we do not need public green spaces for all to use - we have the countryside.</p> <p><a href="https://www.bbc.co.uk/news/health-38520092">https://www.bbc.co.uk/news/health-38520092</a> At present our library, toilets, youth services and leisure centre are desperately underfunded and barely accessible. (<a href="https://www.newburytoday.co.uk/news/news/31897/funding-pledge-to-support-thatcham-library-for-another-year.html">https://www.newburytoday.co.uk/news/news/31897/funding-pledge-to-support-thatcham-library-for-another-year.html</a> Healthcare We have no A&amp;E department at our local hospital, no maternity unit and waiting times for routine doctors appointments is in some cases are 12 weeks, pre Covid. Environment The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent. Thatcham Vision found residents in favour of Brown Field development. There is no commitment to net-zero carbon mentioned in the report. Please advise where can the environmental impact study be viewed? Also, to quote the councils Environment strategy 2020-2030 document, on page 13 states "Protect our environment for future generations as one of the key elements of the Vision for the West Berkshire Environment in 2030. Additionally, on page 15, one of the Strategic Objectives to Deliver the Environment Vision is "Maintaining and enhancing our green and blue spaces and encourage people to use it. The strategy for The Path to a Greener West Berkshire in 2030 on page 21 has a key theme on Protecting and Enhancing our Natural Environment. Our existing public right of way will be lost in the new development.</p> <p>(<a href="https://www.countryliving.com/uk/wildlife/countryside/a757/reasons-to-go-for-a-walk/">https://www.countryliving.com/uk/wildlife/countryside/a757/reasons-to-go-for-a-walk/</a>) I'm intrigued as the comment made by Hilary Cole regarding the vision that less commuters will be about following the trend that Covid-19 has brought more homeworking. There are several studies that show that the decline has been brought forward by 5 years due to the pandemic, with more flexible working. Therefore there is likely to be more brownfield sites</p>	<p>flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>with large offices closing and the trend to towards smaller hub offices. Thus, large office complexes such as Bayer in Newbury already vacant will remain empty. Before planning on destroying the countryside should a detailed review of current empty commercial areas be conducted to ensure all potential brownfield areas are fully considered? Transport Traffic is already congested at the Floral Way and Siege Cross Roundabouts right down to the train station. Quite frequently during peak rush hour times, cars queue up Floral Way from before the Mill House roundabout and can struggle to get out from Foxglove Way onto Floral Way. The area is further congested with Francis Baily school run traffic and the new Orcas which are an accident waiting to happen. HGV's travel in these areas all day, every day, due to the distribution centres in Pipers Way the addition of more housing will make this worse. Northfield Road, Park Lane and particularly Harts Hill Road have already become rat-runs to avoid these roundabouts and the A4. The addition of such a large number of dwellings and increase in cars c3,400 based on the average of 1.4 per household (<a href="https://www.nimblefins.co.uk/number-cars-great-britain#:~:text=How%20many%20cars%20are%20there%20per%20household%20UK%3F,per%20household%20in%20the%20UK">https://www.nimblefins.co.uk/number-cars-great-britain#:~:text=How%20many%20cars%20are%20there%20per%20household%20UK%3F,per%20household%20in%20the%20UK</a>). Would heavily add to the already congested roadways in such a small area. And with their no possibility of having a bridge over the railway this will vastly increase the queues when the barrier is down, which can frequent up to 20 mins leading to queuing traffic up to the A4. There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters. Economy Thatcher has limited high-quality jobs; a high proportion of residents are self-employed or commute out of the area. In recent years three major banks have pulled out of our High Street, and pubs are unsustainable. The pandemic has only exasperated the problem with even fewer local amenities.</p> <p>Change proposed: Please refer to response to Q2 in line with each comment. With the forthcoming Census next month (March 2021) would it not be more prudent to wait and review the true data from that before creating the Local Plan</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

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	Review? Information from the census helps the government and local authorities to plan and fund local services, such as education, doctors surgeries and roads.	
Deborah Reynolds (lpr517)	<p>Response to consultation by West Berkshire Council on Emerging Draft West Berks LPR and Thatcham Growth Study Stage 3 report by David Lock Associates From Dr Debby Reynolds CB This response addresses two major documents which have been issued for consultation at the same time. It makes seven recommendations to address weaknesses in Chapters 3, 4 and 5 of the emerging Local Plan and opposes the housing allocation in SP13, especially SP17 North East Thatcham Strategic site. The SP17 proposal is disproportionately big, poorly sited and would have too great an impact on the surrounding population, infrastructure and environment. Chapter 3 Shaping West Berkshire Vision and Objectives The chapter on Our Vision and Strategic Objectives need to be strong and future proofed. The vision statement in para 3.4 is welcome and that West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside. However strategic objectives on Heritage, AONB and Green infrastructure do not spell out a compelling vision for nature. Written strategic objectives on nature are sadly lacking. This means the Council's plan lacks ambition for the future and demonstrates no apparent priority is attached to the natural environment, biodiversity or nature conservation It is remarkable that the clear global concerns on biodiversity, species loss, habitat loss and climate emergency, well-rehearsed in section 5, are so condensed into inanimate, inherited and purely visual aspects of our area. The council should aim do far more to respond to peoples concern that this is not only under threat globally but also imperilled by weakness in their own plans. Recommendation 1 Add in a new standalone strategic objective on Nature for Future Generations Gives a specific means to deliver the vision of abundant biodiversity across the entire area, Holds the council to account for concerns of local people on delivery of Section 5 currently called our environment and surroundings, To be measured by conservation of existing assets and the creation of new ones. Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In terms of impact on the natural environment, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability</p>

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	<p>developers. Chapter 4 Development strategy our place based approach The spatial strategy SP1 and SP2 and supporting text are important. SP1 states: Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements. However the red-lined envelope depicted in the Thatcham growth study fails to address the necessary separation and is in direct contradiction to this strategy. The separation of Newbury and surrounding rural settlements from places identified in the development strategy (e.g. Thatcham regeneration) needs to be strengthened in every aspect of Council thinking and policy.</p> <p>Recommendation 2 The LPR must step up and improve its policy, internal and external guidance on separation. The requirement for a strategic gap, to include buffer zones, with recognition of village visions prepared by Parish Councils is essential. It must ensure that sufficient budget is allocated to meaningful strategic separation by developers in their appraisals. Pre-commencement conditions must be set to enforce this. SP2 states the proposed arrangement if an application is deemed to be major development with proximity to the AONB and aspects that further consideration will take account. However the consultation on the Local Plan Review and a simultaneous consultation of a detailed growth study, which is clearly a major development, is a seriously flawed procedure. This is confusing to local people who want to express their views, gives the clear message that the parameters in the plan are already fixed and therefore one or other consultation has a predetermined outcome. In addition the time table for two such large consultations is unfair. Recommendation 3 Complete consultation on the LPR to make the much needed improvements. This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP. Spatial strategy SP3 and 4 reflect many aspect of national policy. However there is no evidence that the policy alteration associated with exclusions around AWE Burghfield or</p>	<p>Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced. The biodiversity policy and natural environment policy within the Local Plan Review has been strengthened following consultation. Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further</p>

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	<p>Aldermaston have been taken into account centrally, thereby updating the national allocations. Residents can rightly expect the Council to have challenged this at the highest level, including by Judicial Review, before producing a plan B such as the Thatcham development. All the materials in the review predate the dramatic alterations associated with online shopping and the COVID-19 pandemic. Therefore it is clear that the housing allocations are flawed in several respects. Recommendation 4 provide clear evidence of Up To Date national comparable figures for developable land. This must demonstrate that reassessment centrally has been undertaken, demonstrate the impact of this and COVID-19 are all accounted for in the Local plan review. Set demanding targets for conversion of brown field commercial property to residential. Chapter 5 Our environment and surroundings responding to climate change There are several important and strategic statements to emphasise here, in particular: To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11 Ecological distinctiveness design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11 A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings. Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to nature recovery networks. However the absence of the strategic priority reduces their impact and will not ensure their delivery. Recommendation 5 In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document. This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect. Chapter 6 Delivering housing SP 13 lists the sites for residential and mixed use in Newbury and Thatcham for sites 1 ha or more. Here it adds in NE Thatcham as SP17 for the first time. This draft</p>	<p>updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In terms of consultation, following the Regulation 18 consultation, responses will be considered and where necessary amendments to the plan will be made. The Plan will then go through another period of consultation known as Regulation 19 consultation prior to being submitted to the Planning Inspectorate to be examined by an Independent Examiner through what is known as an Examination in Public.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing</p>



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	<p>local plan review and associated report therefore set out a huge increase in development area and house numbers. There is no justification for such an increase in allocation, and in SP17 the proposal of 2500 houses is completely disproportionate for Thatcham and surrounding areas. In the opinion of Bucklebury Parish Council the figures are flawed and therefore withdrawal for a fundamental review and meaningful justification is essential. The impact on the local setting and breach of the Floral Way boundary, objections raised by the North Wessex AONB, are not addressed. No case has been made for ribbon development and the Colthrop village concept is a completely unacceptable joining up of Midgham and Bucklebury Parishes with Thatcham and should be removed from any future considerations. Any housing allocation must demonstrate local benefits to the natural environment. The model for infrastructure provision is dependent on realising house sales, therefore is not baked-in or inevitable. A transparent, enforceable commitment to ensure fair share of profit and investments in local assets is an essential pre-commencement commitment which should be policy for any development. The level of ambition for infrastructure provision and biodiversity gain is insufficient. No budget is allocated to achieving 10% biodiversity gain in the appraisal of viability, the design features do not demonstrate any input from conservation professionals, nationally or locally. Green and biodiverse are not equivalent. The concept, beneficiaries and impact of a new strategic country park are unclear. Any future consideration of the idea must make clear that is outside the area of allocation and protected in perpetuity. If land at Colthrop village is no longer needed for farming it should be entirely devoted to biodiversity net gain and used to establish a fully functional wildlife corridor between the Kennet valley and Bucklebury heathland. Numerous aspects of the Bucklebury vision have been ignored. It appears that the views of residents on the edge of the proposed area were either not sought or not taken into account. Recommendation 6 SP13 is unacceptable and needs alteration, particularly removal of the proposed NE Thatcham line item. All the reasons are set out above and in the Bucklebury Parish Council and Thatcham Town Council submissions. SP17 North East Thatcham Strategic site allocation SP17 sets out that The Council will be supportive of proposals which have regard, and positively respond, to the master-planning work</p>	<p>needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>

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	<p>contained in the Thatcham Strategy Growth Study (2020). It then lists features the NE Thatcham Strategic allocation may be expected to deliver. However the residents of Bucklebury and Thatcham do not see it that way and their responses should give the Council grave cause for concern. The main objections are listed below: Flawed housing demand analysis The analysis of housing demand predicating this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking WBC's own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed. Strategic Gap A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed. Traffic A development of the scale proposed will generate considerable traffic but the analysis in the proposal underestimates the volume and impact on the Parish. It is assumed that the bulk of the new traffic will use the A4, accessed via Floral Way. However, the A4 is already overloaded at peak times and new residents will look to find alternative routes. These inevitably will be through the Parish for those looking to access the A34 and the M4. The roads through these villages are ill suited to additional traffic; they are rural, single carriageway roads mostly lacking footpaths and featuring blind bends. Speeding is a well known problem in the Parish and more cars will make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and will endanger children walking to school. AONB and Bucklebury Common It is clear that the proposed development to the north-east of Thatcham involving 2500 houses would have a big influence on the local wildlife. The proposed development abuts Bucklebury Common and AONB. This development would have a lasting and negative impact on these special environs. The impacts fall into</p>	<p>Local Nature Recovery Strategies (LNRS) are a flagship measure in the Environment Act 2021. Local Nature Recovery Strategies are a new system of spatial strategies for nature they will: map the most valuable existing habitat for nature; map specific proposals for creating or improving habitat for nature and wider environment goals; and agree priorities for nature's recovery. Once the Local Nature Recovery Strategy is produced for the District it will guide the delivery of biodiversity net gain and other nature recovery measures through illustrating where the most valuable existing habitats are located and will focus on habitat creation and/or improvement where it will achieve the best outcomes. These strategies will be strongly linked to the implementation of SP11.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected</p>

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	<p>two categories; those that impact the AONB directly and those resulting from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. Importantly the plants in and bounding the AONB will suffer and the Common will be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles. The visitor numbers, from the proposed development, would exacerbate damage to a struggling ecology. Bucklebury Common, one of the few remaining areas of lowland heath lies just a kilometre or so to the north-east. It is well known for some special birds in particular the nightjar, but also the woodlark, tree pipit, stonechat and woodcock. These nest on the ground are very susceptible to disturbance especially by dogs. The development would put much more pressure on the heath and make successful breeding of these species much less likely. So the council's attention should focus on this impact of the proposed scheme not highlighted in the Biodiversity and Green infrastructure. Just visible at the north east edge of the plan on page 36 is the edge of Bucklebury Common, the eastern portion of which (east of the settlement of Upper Bucklebury) is an area of lowland heath, which has been restored by conservation management. This site is already subject to considerable recreational pressure. Heathland is a priority habitat identified in the Berkshire Local Nature Partnership Biodiversity Plan, and holds breeding populations of two of the priority species in the plan, Nightjar (<i>Caprimulgus europaeus</i>) and Woodlark (<i>Lullula arborea</i>). Another species on the UK's list of Red Data birds, Woodcock (<i>Scolopax rusticola</i>) also occurs, a species which has suffered a dramatic contraction in its UK breeding range (more than 50% in the 25 years to 2010) and numbers. These are ground nesting birds, vulnerable to disturbance. The wider area forms one the Berkshire's Biodiversity Opportunity Areas (BOA), known as Bucklebury Plateau (see - <a href="http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf">http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf</a>) As no doubt the council is aware, lowland heath is a threatened habitat important for a number of species of wildlife. Its global distribution is limited, with the UK having about 20% of the world's remaining area. About 80% of the UK's lowland heath has been lost since 1800. The Thames Basin</p>	<p>increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>

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	<p>Heaths of north Hampshire, west Surrey and south east Berkshire are an area of Special Protection (SPA) and now benefit from planning policies requiring the provision of suitable areas of natural greenspace (SANGS) as mitigation for any new residential development within 5 km of the heathland areas. In this case the site would introduce 2500 new households almost all within 2 km of Bucklebury Common, and we consider that mitigating the impact of the increased recreational pressure, and the opportunity to enhance biodiversity should have formed part of the scheme, consistent with current Local Plan Policy CS17, emerging policy SP11 and NPPF paragraphs 170 and 175. The restored area of Bucklebury Common referred to above is currently a relatively small fragment of heathland maintained by voluntary effort. It does though form part of a larger area within the Bucklebury Plateau BOA extending to the west of Upper Bucklebury that has potential for habitat restoration as heathland. Recommendation 7 remove SP17 from the Local plan review. Conclusion In summary, I have serious concerns about the emerging draft Local Plan which can be addressed through adoption of the seven listed recommendations. Otherwise the impact on West Berkshire, Thatcham and especially the village of Upper Bucklebury will be very damaging. With increased traffic, a steady flow of visitors the consequential damage to the local environment, the character of our area would change forever and not for the better.</p>	
David Clyde (lpr132)	<p>I wanted to express my real concern about having an additional 2,500 new homes to the east of Thatcham. There are many reasons and I'll mention a few here. 1/ The impact on the traffic on the A4. All traffic would need to head to the A4 or even worse, onto Floral Way. At peak times, the queues on Floral Way and then the A4 are horrendous. This is not good for journeys but particularly air pollution as cars hardly move. 2/ The crossing over the railway. Having a level crossing in a town the size of Thatcham makes it difficult to get south with the only other option, going around it and putting larger traffic volumes in other places like Brimpton. It seems crazy that there was a bridge built over the railway in Ufton Nervet based on the small numbers that travel there and not in Thatcham. 3/ We have one secondary school in Thatcham, which is pretty full and adding an additional 2,500 houses just puts an additional strain on it. It would end up not coping with</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to</p>

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	<p>the demand and kids would have to travel further. Again not good for the pollution and environment generally. 4/ Other facilities will be stretched, GP surgeries, dentists, etc. and they are stretched as it is. 5/ Finally I'm worried about losing further green space in West Berkshire. The green space is part of the attraction of where we live and I moved here nearly 25 years ago for the space and less traffic that was in Reading. Extra building on non brown field sites makes them become a permanent urban area and takes away the space, trees, wildlife and creates many more problems than it solves.</p>	<p>the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be</p>

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		<p>important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p>
Duncan Powell (lpr355)	<p>I am writing on behalf of my whole family to voice our concern and objection to the proposed development of 2500 home in North East Thatcham. Having attended a presentation by Mr Southgate of Bucklebury Parish Council last Friday, I sense it is a done deal already as far as the Parish Council is concerned and that the parishioners were being sold the least bad option proposed by WBC and supported by the Parish Council. We are dismayed that the Parish Council seem to display so little resistance and are not leading the crusade to stop this project. We are equally dismayed that West Berkshire Council seems happy to forge ahead with this plan with little consideration for the hugely negative impact on the local communities. The timing of this consultation will not be a coincidence. I get a sense that West Berkshire Council is trying to push this project ahead by hiding it at a time when people have been taken up with Christmas period and concerns about Lockdown and Brexit. People have consequently had insufficient time to review the plans and formulate a formal response before the fast-approaching deadline. I will not accept that this is already a done deal on the basis that there is nowhere else for the housing to go. Even if this were the case and having spoken to the CPRE (Campaign for the Protection of Rural England), it would seem that West Berkshire Council could indeed object</p>	<p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that “We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government’s aspirations to have plans in place across the country by 2023.”</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the</p>

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	<p>strongly to the housing allocation and could negotiate a reduction in the allocated numbers if suitable locations are not available. This possibility was not mentioned at our presentation. The effects of this proposal are devastating for the town of Thatcham and I imagine there will be plenty of objections from its residents, but my arguments are principally focussed on the village of Upper Bucklebury and the adverse impact on our community. Do we need it? I understand the need for development and accept that we must build more homes, but I question the need to build as many as 2500 in Thatcham, irrespective of current targets. It seems a totally disproportionate allocation in an area where so little of the land is developable due to AONB and flood plains. The plans would have been in place well before the Covid pandemic, so would it not be sensible to review the requirements given the changing nature of our demographics and working patterns since then? If the plan was to house commuters to London, who knows how many will still want to, or be required to, work in London (or in any office) post-Covid? If the work pattern continues to favour a work-from-home arrangement, then who will be coming to live in these houses? Also, with the birth rate dropping and local primary schools not filling all classes in some year groups, will we see half empty classrooms in the proposed new school(s)? It will be more likely that the school(s) will not get built at all. If, however, these new houses were purchased by keen commuters and assuming people returned to office work in London, I would be curious to see what plans are in place at the station to accommodate the hundreds of extra cars that would need to be parked there. Not everyone will be walking to the station and the facilities there would just not be adequate. Amenities New schools, together with shops and other leisure facilities, are part of the proposed plan. However, it is not clear at what stage these facilities will appear. Unless they are built first, there is the risk they will not be built at all since anyone already living in the new houses will necessarily have already found a school solution for their children. If the provision of infrastructure such as schools is dependent on house sales then we have a potential chicken and egg situation; schools will not be built until houses are sold, but houses will not be bought until there is a school built. If there is little perceived demand and with dwindling budgets at the end of the project, the schools may well not materialise.</p> <p>Impact on Upper Bucklebury It is impossible to overestimate the negative</p>	<p>Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>The consultation was run in accordance with the council's Statement of Community Involvement (SCI). A public consultation such as this is would usually last 6 weeks but because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p>

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	<p>impact this development will have on the village of Upper Bucklebury. Whichever way you look at it, with the development creeping up the hill, Upper Bucklebury will all but merge with Thatcham, separated only by a small copse at the end of Long Grove. This cannot be a good thing for the identity of our village and for the peace, tranquillity, and security of our community. The new Thatcham development and Upper Bucklebury would be linked via the footpath that currently runs from Long Grove to Colthrop. This has already seen increased footfall since the pandemic and will only increase with the new development as residents choose to walk, exercise dogs, ride bikes to the countryside to the north via Upper Bucklebury. Are the residents of Long Grove expected to continue to repair and maintain their road for the benefit of non-parishioners? The inevitable increase of visitors to our village/parish and Bucklebury Common can only have a detrimental effect on our local environment. The ancient woodlands, meadows and wildlife surely need to be protected. Bucklebury Parish Council say on their website: "Loss of habitats or habitat change as a result of inappropriate management are one of the most damaging threats facing rare species in Berkshire. These habitats should be safeguarded wherever possible and appropriate advice sought on managing them to conserve the natural diversity of life and to halt the extinction of species diversity not only in Berkshire but also in the UK. "If this development were to go ahead, these precious woodlands and rare habitats would almost certainly be under threat with a substantial increase in the visitor numbers our woodlands would be a short hop for the residents of the new development compared to anywhere else in Thatcham and the surrounding area they could walk (or drive!) to. It was interesting to hear in the presentation of the estimated 12% increase in traffic heading up Harts Hill towards Upper Bucklebury. This is already significant on such a dangerous hill, but unfortunately is probably an overly conservative estimate. It will not take long before the increased congestion on the A4 and Floral Way (already congested at peak times) leads to more Rat Run traffic through our village. As well as environmental and noise concerns, many parents will be concerned for the safety of their children in the village especially as they walk to and from school. This planned development and these two issues of increased traffic and damage to the local environment in particular go completely against the Bucklebury Vision</p>	<p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>which very clearly emphasises a commitment to maximise rural conservation and protection from pollution, protect the environment for future generations to enjoy, conserve and enhance the natural beauty of the landscape, resist any development that would create unacceptable levels of traffic, and so on. Sadly, I cannot see how this new development fits in with our parish's agreed Vision. Country Park I am bemused by the idea of a proposed Country Park and have some reflections on this. Firstly, I am not sure why we need one at all. We are adjacent to vast Areas of Outstanding Natural Beauty with magnificent vistas and miles and miles of some of the most beautiful walks you could wish for. I can only think it is to make us feel better about the development by creating a natural gap between us and them. The reality is more likely that it is a steep bit of land that would be too difficult and expensive to build on, so it is turned into a country park. It would be interesting to know what this park would look like. Steep slopes do not really lend themselves to informal recreation and I would also be curious to know if budget has been allocated to maintain it long term? All discussions around the county park and its protection seem very unclear and I think more detail and commitment are needed. I am also surprised that there seems to have very little mention of biodiversity, which is surprising with a development of this magnitude. It is my understanding that with any development of this nature, there should be a percentage of net biodiversity gain. There was no mention of this at the presentation of how this would be achieved and it's hard to understand how it could given the amount of farmland that will be given over to housing and other amenities. Conclusion In summary, I would like to register my objection to these plans in the strongest terms. The impact on the village of Upper Bucklebury will be immeasurable. With increased traffic, a steady flow of visitors seeping in and the consequential damage to the local environment, the character of our peaceful village will change forever and not for the better. I have urged our Parish Council to represent the views of all parishioners to West Berkshire Council on this issue and not just accept that this is a done deal. At the same time I am urging West Berkshire Council to reconsider the development plans for Thatcham and strongly object to the allocation as you are entitled to do. Please fight the corner of your local communities and defend the Vision that they are so keen to promote.</p>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p>

Respondent (with lpr ref)	Response	Council Response
Peter Weedon (lpr366)	<p>I wish to OBJECT to the scheme on the following grounds and quote from the Stage 3 Report Thatcham Strategic Growth Study. The development is attempting to squeeze a quart into a pint pot due and is concentrating a disproportionately high area of West Berkshire Council's housing obligations into a small percentage of its total land holdings. The entirety of the site is outside of the existing settlement boundary of Thatcham, currently closely drawn along Floral Way, the A4 and Pipers Way. (2.12) The West Berkshire Landscape Character Assessment outlines a landscape strategy for WH4 (Cold Ash Woodland and Heathland Mosaic) which will inform development proposals at NE Thatcham. Key principles are: Retain the distinction between and individual identity of settlements Conserve elements that mark a transition between settlement and countryside (2.36) The development seriously undermines the green gap between Upper Bucklebury and Thatcham and will ultimately merge the two. North Wessex Downs AONB Board has stated its objection to development on all the sites that make up NE Thatcham, through the HELAA process, due to the impact on the setting of the AONB and the breaking of the Floral Way boundary. (2.47) There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling (2.51) Development at NE Thatcham breaks out of the valley bottom that has defined Thatcham's extent (4.2) It is important to note that Thatcham has few examples of hillside development, and so extending the urban grain and pattern of the immediate surroundings is unlikely to achieve a positive result. (Design Principles 4.5) The highways strategy is to direct traffic away from rat-running through Cold Ash and Bucklebury by routing vehicle traffic southwards towards the A4. (4.21) This is unlikely to be effective in practice as evidenced by the increase in traffic through Upper Bucklebury every time there is an accident/congestion on the A4. This study proposes that capital funding for the new secondary school within North East Thatcham would be 50% funded by the developers, delivered through a Section 106 agreement on developer contributions. (5.2) I seriously question West Berkshire Council's ability to fund the balance and ongoing costs of the school. As an Upper Bucklebury resident I am also concerned with the impact of: Increased light pollution no reference in the document Substantial increase</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council</p>

Respondent (with lpr ref)	Response	Council Response
	<p>in noise pollution and detrimental impact on quality of life decades of construction work Increased air pollution increase in traffic</p> <p>Change proposed: That no development should be permitted north of Floral Way to preserve the green gap between Thatcham and Upper Bucklebury.</p>	<p>is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation</p>

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		<p>to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>
Paula Saunderson (lpr965)	Strongly object on Environmental issues Increasing Flood Risk to other nearby areas Highways - lack of railway bridge Air Pollution Density Travel & Traffic Plans Loss of Green fields NIMBYISM	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

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		<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p>

Respondent (with lpr ref)	Response	Council Response
Clive Tombs	<p>The area identified under policy SP17 appears to offer the potential to deliver large scale residential development adjoining the established urban area of Thatcham and also close to the existing employment area at Colthrop.</p> <p>Change proposed: There needs to be much more emphasis placed on delivering and maintaining physical measures and service improvements, to ensure sustainable transport means are primarily used for local travel between (a) the proposed new development at North-East Thatcham (b) the established town centre and (c) Thatcham Station. As well as wide, uninterrupted, well-signed footways and cycleways, there needs to be high-quality bus services - operating to simple routes at least 30 minute frequency, with proper supporting infrastructure e.g. waiting shelters, and properly subsidised for a minimum of 5 years in order that they can be allowed to grow patronage - providing connections between the proposed new development, town centre, Hospital and Newbury (and at least allowing interchange with the core Jet Black bus service to/from Reading, if not affording direct services to Reading), and also between the development, business area/Pipers Way and Thatcham Station at least at peak times. It is important that these provisions are made and fully-funded to provide a quality service for the long-term - otherwise there is a risk of ending up with car-dominated areas such as the existing Floral Way estates where the bus connections appear to have only been delivered in a half-hearted way for a short period after those estates were built. Full consideration also needs to be given to adequate measures to fully address the likely impacts on the highway network associated with travel further afield, especially from the development (and the wider Thatcham area) to Basingstoke/M3 as well as to A34/M4. While construction of a bridge to replace the level crossing, and upgrading of the road infrastructure from east of Thatcham via Crookham Hill to the A339 may be unpalatable to some and is reportedly extremely expensive, this may be essential to allow for the level of travel demand between Thatcham and Basingstoke/M3, without the extensive delays at the current level crossing or impacting on Newbury. Completion of the Thatcham Northern Distributor Road to a consistent standard should also be brought</p>	<p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In relation to the other matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



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	into consideration, rather than relying on the NDR using a sinuous, old portion of Bowling Green Road. Further, consideration should be given to whether the A4 through Newbury has sufficient capacity to carry traffic from the proposed new development through to the A339 and on to the A34/M4, or whether additional provision is required.	
Amy Brocklesby (lpr137)	I have been hearing a lot about the application for many new homes in the Thatcham area. After moving to the area just under 2 years ago I have learnt a lot around quality of life! but since moving here I have also seen the negatives to this small village! Parking is an issue every street has many cars parked all over as none of the new builds have enough parking with them every house now a days need 2 spaces most new builds only come with 1! I still to this day cannot get a dentist I call every month on and around the Thatcham/Newbury area and none Are taking patients as they are full! Doctors are also under pressure and nothing seems to be helping them out! Roads they are always busy and you always sit in a queue I've realised no matter what time of day! Postal and waste collection services are already pushed too with the amount of residents now! I think when building this many at once we really have to think about what impact on the environment and the structure already there of that can't cope and it clearly isn't now then nothing should be built until this is sorted! We really need to start considering healthy as well-being and not just £ before making decisions around building our planet won't last for ever!	Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers
Mathew Cooke (lpr867)	I'm writing to provide feedback for the NE Thatcham Development of 2500 homes you are proposing as part of the Local Plan Review 2020 -2037 Emerging Draft December 2020 document. After careful consideration I would like to object to this development proposal for a number of reasons. Inadequate Supporting Infrastructure for Scale of Development The proposal doesn't contain details of an increase in healthcare services to support +25% housing in the Thatcham area. The proposal doesn't address the strain of increased demand on Thatcham Train Station. Taking into account the fact that parking facilities at Thatcham Train Station are already insufficient to cope with current demand, there would need to be a significant	Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.

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	<p>increase in the provision of parking at the station to cope with increased demand. The road infrastructure in a number of common commuting directions from the development are not sufficient. These include: Travelling north to the A34 in the Cold Ash direction. Travelling east from the development through Upper Bucklebury, Chapel Row &amp; Bradfield (many chose to use this route instead of the A4). Travelling south across the Rail Level Crossing. Negative Impact on Surrounding Villages &amp; North Wessex Downs AONB The location of the development straddling Harts Hill Road, which includes a roundabout, will lead to a significant increase in traffic using the Harts Hill Road route: This increased traffic will negatively impact many surrounding villages including Upper Bucklebury, Cold Ash, Burdens Heath, Chapel Row and Bradfield. The current roads will not be sufficient to support this increased level of traffic. These roads already suffer with concerning levels of speeding (recent Parish Council SIPS deployment has confirmed this and the police have the figures). The increased traffic will be a safety concern for local residents, particularly children whilst walking to and from school. The houses located on Harts Hill Road and Burdens Heath in Upper Bucklebury, and The Ridge in Cold Ash, do not have a footpath outside. Increased traffic along these roads will make it significantly more dangerous for pedestrians in these areas in particular. The increased volume of traffic will impact the quality of life for the residents of the villages mentioned through increased traffic noise and disturbance. The close proximity of the development to the North Wessex Downs AONB will put increased strain on this area: It already ready suffers from significant waste issues, that would be a lot worse if not for the kind village volunteers who regularly undertake rubbish clearing days. It would also experience an increase in 4 wheeled vehicles being used illegally in the woodland that the Parish work hard to limit/prevent. The development would have a detrimental impact on the wildlife that currently lives in and enjoys the area. It will lead to a loss of the open aspect of the local neighbourhood and loss of existing countryside/rural views from a number of existing properties. This will specifically impact those properties along the lower Harts Hill Road region.</p> <p>Change proposed:</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that</p>

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	<p>I do understand that West Berkshire has a requirement to provide additional housing in coming years. However, I object to the scale of this development in this single location, for the points I mention above. If development of the proposed site is essential, I request the following be carefully considered: Significantly reduce the development from its current size of 2500 homes, to limit the impact on local residents by considering using additional sites across the West Berkshire area. We consider the proposal to be an unacceptably high density of homes. Concentrate the development toward the southern Colthrop land. This would concentrate the development nearer to the A4 and limit the impacts I highlight to the surrounding villages and the AONB. Ensure the development cannot be accessed from the Harts Hill Road. This would involve removal of the proposed Harts Hill Road roundabout. This is essential to limit the negative impacts of increased traffic into the surrounding villages. In addition to the above, share plans that show how you will limit the flow of traffic through the surrounding villages including Upper Bucklebury, Cold Ash, Burdens Heath, Chapel Row and Bradfield. Challenge the plans to concentrate the development in a band closer to Floral Way, in order to ensure that the development is as far away from the Wessex Down AONB as it can be. Share plans to address the infrastructure challenges I highlight above including the train station facilities and the level crossing. I would happily talk further with you if required</p>	<p>whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced. Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing</p>

Respondent (with lpr ref)	Response	Council Response
		<p>requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

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		infrastructure, active travel routes, education and community facilities, and highway improvements.
Ian and Diane Dalgarno (lpr356)	<p>We are writing to express our concern and objection to the proposed development of 2500 home in north-east Thatcham. Firstly, we feel that communication to the community on this major issue has been very poor. We only discovered the plans when a local resident posted news of the proposed development on social media and although word has since spread there has been no formal communication by the Parish Council to the local community which we would have expected given the size of this project. It would appear that West Berkshire Council is trying to push this project through the back door, hiding it at a time when people have been distracted by Christmas, Brexit and Lockdown a good time to bury bad news is an expression that springs to mind leaving residents with insufficient time to review the plans and formulate a formal response before the fast-approaching deadline. We did attend a Zoom presentation by Mr Southgate on Friday 15th January and we got the distinct impression this was a done deal as far as the Parish Council is concerned and that the residents were being sold the least bad option. We wish to register our objections to this development on the following grounds: Thatcham is already over developed with a poor supporting infrastructure Thatcham medical services are already overstretched Without a bridge over the railway any further traffic in the area will cause Thatcham to become gridlocked at peak times The development will have an extremely adverse impact on the rural community of Upper Bucklebury particularly with increased traffic flows. There will be a huge detrimental impact on wildlife and its habitats Finally, we would question the need for all these houses anyway. Presumably housing plans were developed when we were members of the EU and based on open borders no longer the case. Covid will have a detrimental effect on birth rate which is already in decline Loss of jobs and income will mean people will not have the means to buy expensive property With the closure of shops and office in town centres the opportunity should be taken to convert such properties into low cost property to rent or buy. We urge the Parish Council to do all they can to resist this unwanted and (probably unnecessary) development.</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>

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		<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

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		<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council</p>

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		is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.
Caroline Tocher (lpr369)	<p>As recent residents of Thatcham, having moved to Midgham in December 2020, we strongly object to this proposed development. The context of the Local Development plan states that the 'rural dimension is very important in shaping the character of West Berkshire' and you acknowledge in your vision that 'the character of these rural areas [Cold Ash/Ashmore Green etc] visibly contrasts to the more urban areas of Newbury and Thatcham'. The proposed development places the rural hamlet of Midgham on the doorstep of Thatcham and will significantly alter its rural character. Having lived in both areas, the local community in Midgham feels much more localised and tight-knit than Thatcham itself, and to lose the surrounding countryside will significantly alter the local environment and character of the area. This plan contradicts the points you have raised about the context of the area in sections 2 and 3. It also contradicts the Statement in section 4 about the Eastern area that 'the individual identities of the separate settlements within this area will be maintained'. Development could be spread more evenly around Thatcham and Newbury, rather than all concentrated in this one area, leading to a huge decrease in quality of life for current residents of Midgham and Thatcham alike. As previous residents of Thatcham, and having many relatives and friends living in the town still, our objections encompass not just how the villages around Thatcham will be affected, but how the lives of current Thatcham residents will be affected too. The proposed development is effectively a suburban add on to Thatcham which will add very little for existing Thatcham residents and will take away substantially more from them. The whole premise you have given for expanding Thatcham is presented as being to aid Thatcham in becoming 'a thriving market town' by bringing 'considerable benefits to the town', and yet you haven't recommended any improvements to the town itself. Instead, you acknowledge that the new development is 'an urban extension' with 'supporting facilities'. These sound supplemental and designed to service the new areas alone. The facilities for the rest of the town, meanwhile, would remain largely unchanged. The town centre, by its historic nature, is not fit for major expansion and to do so would distinctly change the character of</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Thattham itself. Pressure on Thattham Medical Centre and local dental surgeries is already high, and yet would be 25% higher with this new development. Our previous address, Fortuna Mews, is directly off of the A4. My husband and I would travel daily out of the area using this road and experience substantial delays because traffic volume was so high already. When the M4 is closed traffic becomes unbearable. The plan, however, only talks about road improvements between the new development and the town centre and railway, thereby simply increasing traffic on the rest of Thattham and Newbury's trunk roads by 25% with no plan to address this in place. There is also a significant risk that this will massively increase traffic up Harts Hill Road, through Upper Bucklebury and along through Chapel Row as people seek alternative routes to Theale and the M4 than the A4 which is inevitably going to struggle. This already happens to some degree. This road runs through the North Wessex Downs AONB and will significantly decrease the quality of life for people in these areas. Throughout the rest of the local plan you aim to minimise impact on these areas. It is, in fact, the reason given for focussing largely instead on Newbury, Thattham and the Eastern area. Finally, you talk of the benefits for the whole town brought by 'recreational facilities' including a country park, yet you are building over open countryside that Thattham residents already benefit from. By doing so, you are cutting them off from the countryside and increasing traffic as they all get in their cars to reach it. A huge benefit of living in Thattham is the easy access to open countryside and beautiful walks, no matter where you live, and this would be removed from huge swathes of the town. The whole premise of this development is to make Thattham more 'thriving' - but if any of us wanted to live in a larger urban environment, we would probably have moved to Reading instead. Thattham provides welcome affordability for the area whilst giving access to the unique area it is located in. This plan feels as if Thattham and surrounding areas are being thrown under the bus and sacrificed so that large scale developments do not need to happen in any of the regions more typically 'desirable' towns.</p> <p>Proposed change: I understand that development needs to take place, but this should and could be spread around the region's urban centres more. Increasing</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>Thatcham by 25% is disproportionate to the changes being effected in other parts of West Berkshire. Even developments around Thatcham could occur in patches, rather than in this one block which will substantially change this side of Thatcham and Midgham Parish.</p>	
<p>Durran Heslop (lpr1044)</p>	<p>I write in respect of the proposed large housing development in North East Thatcham as detailed in your current Local Plan Review Consultation. Your invidious position regarding the need to provide more housing is well understood and your efforts to avoid the intervention of the Inspector are much appreciated. However. Thatcham has suffered enough with sprawling development and already seems to be a way over-developed "dormitory" for the wider area. In this instance I write as gravely concerned resident of Bucklebury Parish for this new proposal seeks to massively advance the township of Thatcham towards Upper Bucklebury and to the AONB which it borders. Setting aside opinion as far as possible, I would like to register my comment about what I believe are valid town planning issues which indicate against such a large development in North East Thatcham: Traffic: -The traffic forecasting in the plan already anticipates that a proportion of new traffic generated by the development will pass up Harts Hill and into Bucklebury Parish, likely most through Upper Bucklebury. -The route West towards Newbury on the A4 is significantly urbanised and congested at all but the quietest times with slow journeys owing to traffic lights, junctions and weight of traffic and little hope of improvement. -The route South over the railway is severely restricted by the level crossing. Even without such a significant increase in Thatcham's population this route suffers severe congestion and improvement of this needs to be considered as part of the overall plan. -The route East down the A4 is expected to take the bulk of the traffic but is already congested at busy times, -The closest access point to the North out of the proposed development is Harts Hill Road running straight into Bucklebury Parish. -It seems likely, therefore, that traffic to the North through Bucklebury and Cold Ash to access the A34 and M4 (at J12 &amp;13) could be considerably greater even than forecast. -Harts Hill Road from Thatcham to Upper Bucklebury is characterised by a steep hill and multiple blind bends, all of which are relatively narrow and unlit in keeping with the proximity to AONB -Adequate foot and cycle ways are lacking throughout the</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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	<p>route which is hazardous enough with the existing level of traffic. -Aside from the central area of Upper Bucklebury, residential roads along Burdens Heath and into Cold Ash are similarly lacking in footways. -Roads through Bucklebury Parish are wholly inadequate to support increased traffic volume and speeds. Proximity to AONB: -Whilst the plan seeks to cap the development at 100m above sea level, in contrast to Upper Bucklebury sitting at 134m, in order to limit visual impact on the AONB, there will be impacts nonetheless. -Bucklebury Common, which is public access land sitting adjacent to the proposed development, is already experiencing elevated levels of visitors including illicit vehicular access all of which is causing damage to the environment thorough inconsiderate parking, dog fouling, littering, 4x4 and motorcycle disturbance &amp; damage all of which is detrimental to the valuable natural environment including rare Heathland habitat. It can be expected that the impact of this development can only be severely detrimental to Bucklebury Common. -WBC seeks to implement a "country park" belt between the 100m cap and the land above, further detail is required to ensure that this area is adequately protected to guarantee it is safe from future development. -The country park area will require concrete plans for landscaping it so that it creates a buffer zone to attract the new residents and mitigate the anticipated growth in visitors to Bucklebury Common. There are other concerns that I hold, some of which may or may not have weight in planning terms including: -Provision of medical facilities. Whilst schools and shops are planned into the proposal, medical facilities are perhaps not so well catered for. -Provision of foot/cycle/bus ways may need to be baked into the individual planning consultations for the developments and are definitely in need of mention.. -if we aim for people to use more public transport, then surely development South of the A4 in closer proximity to the newly electrified rail provision would be preferable. -Aside from the issue of the level crossing, Thatcham Station is in danger of being wholly inadequate for the increased population. Thank you for taking my comment into consideration as part of the consultation process, I hope that the proposals as they stand can be examined in more detail, amended and improved for the greater good of both the prospective new residents, the existing residents of Thatcham and the parish of Bucklebury with it's rare and increasingly endangered rural nature.</p>	<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p>
Sue Dorling (lpr372)	<p>As a resident of Upper Bucklebury I have seen this delightful village grow steadily over the 56 years that I have lived here. The building of the above houses will do irreparable damage to the environment which is a precious and much needed facility for all of us. 2500 houses will result in far more people than the area can cope with plus something in the order of another 5000 cars on the roads and more speeding through the villages which are already being used as a rat run. This will pollute the atmosphere still further. We already have damage being done to our common by 4 x 4s and parents are reluctant to let their children walk to the village school, which is already full, because it is just not safe. There can be no benefits to the people of Thatcham and the surrounding villages as overcrowding and pollution will encourage vandalism and anti social behaviour. Please think very carefully about your responsibilities to local people.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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		<p>modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Prue Matchwick (lpr374)	I strongly oppose this development as the local community infrastructure, even with the suggested improvements, will be insufficient. Floral Way must remain the boundary between Thatcham and the countryside to the north.	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the</p>

Respondent (with lpr ref)	Response	Council Response
		continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.
Bob Champion (lpr376)	<p>Siege Cross Development</p> <p>Thatcham has a population of 26,000. As part of the West Berkshire Development plan it is proposed to build 2,500 homes in one development at Siege Cross. Assuming an average occupancy of 3 per household this means an increase in population of 7,500. That would be 285 increase to the population of Thatcham. Therefore, for every 4 facilities, e.g. shops, doctors, care workers etc another 1 will be required in Thatcham. This is the weakness of the way the proposal has been put together. In context, the increase in population is roughly 2.5 times the population of Theale and 50% more than the population of Hungerford. Why Thatcham? There does not seem to be an economic strategy plan that concludes that development in Thatcham meets the economic, social and environmental objectives for West Berkshire. Two key issues driving these objectives should be the protection of Newbury Town Centre and the potential expansion of Heathrow Airport. How is West Berkshire going to respond to these challenges? Housing should follow economic activity. Just to build houses because a site is available, is poor planning. Without employment considerations there is a danger that all that is created are ghettos that do not make an area attractive to those who will invest in local business opportunities. From an environment and inward investment point of view West Berkshire does not make most of east west rail connections. Rapid connections with London, Reading, Heathrow, to the East and direct connections to Bristol in the West should be high on the agenda. Also, a frequent light rail service between a park and ride at Enborne, and Reading will offer many small/medium housing development opportunities whilst environmentally support economic growth. To support Newbury Town Centre, because of its closeness to the Motorway network Chieveley should be considered as offering housing development opportunities. To ensure those opportunities are environmentally friendly Chieveley needs a frequent express bus service to Newbury Town Centre and the Railway station. This bus would stop at the recently approved</p>	<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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	<p>housing developments near Vodafone HQ. The light railway would offer the development of houses at Enborne adjoining the Park &amp; Ride on the A34. A development of 2,500 homes needs to be part of a cohesive strategy for the district. The Siege Cross proposal does not contain any justification as to why 2,500 houses have to be built in Thatcham. Thatcham If there are strong strategic reasons why 2,500 additional homes are required in Thatcham (which is doubtful) what alternatives to the Siege Cross development have been considered? Alternatives would be 4 or 5 separate developments of around 500 homes each around Thatcham not in close proximity of each other or at a different major site. If this was a true consultation these alternatives would be considered with the strengths and weaknesses of each coming to a preferred solution. The smaller site alternative would require possibly 2 the north of the town, one to the east, west and south. A large alternative site could be on the old Colthrop Paper mill and surrounding land. This may require flood prevention work but does offer opportunities for the construction of a bridge over the railway, canal and river; relieving the level crossing congestion. A 28% increase in local population could equate to a corresponding increase in vehicles using the level crossing with resulting delays, environmental and economic costs. This does not take account of future growth in passenger and freight railway traffic. What would the age profile of the new 7,500 occupants of Thatcham on this site? Where will they go to nursery, school, college, work, and what retirement facilities will they require? What would they expect to be on their doorstep in the new commune, what would they expect to be provided in Thatcham town centre? What would they be willing to travel further afield to? This ignores leisure and social support facilities including Health. It is essential that Thatcham does not become a dormitory commuter town. The plan therefore creates a need to attract / create 3500 to 4000 new jobs in Thatcham. Where is the proposal to create these? What sort of jobs would they be? Where would they be sited? This means that such an expansion to Thatcham would create the need for a business park. Where would this be sited? Has a science / technology park or a university campus been considered? Thatcham Town Centre will be unable to support the retail needs of such an enlarged population. There is no room for expansion. Demand may create proposals for a retail park to the east of Thatcham.</p>	<p>Employment allocations are also being considered through the LPR.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised</p>

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	<p>However, such a development may further damage Newbury Town Centre. Also, the Siege Cross development will mean new residents will have to travel across Thatcham to get to Newbury Town Centre. Siege Cross This development needs to be for a future way of living. It needs to reflect more working from home, with office hubs, excellent broadband facilities, whilst taking account of aim to be carbon neutral. Just putting 2,500 homes on the edge of Thatcham makes it more difficult to satisfy these objectives. Siege Cross is a hilly site. 5% of the population of West Berkshire is over age 80. In real numbers this will increase, what special facilities will be included? Will the site create mobility problems for them? Especially in icy weather. How will they be overcome? Connectivity If Thatcham is to be expanded to the extent envisaged and thrive, communication with the outside world is essential. This means technology infrastructure; road and rail connections need to be first class. North /south connectivity is currently poor. This creates east / west congestion which the growth of Thatcham will add to. Theale, Hungerford, and Marlborough all have direct access to the M4 despite much smaller populations than Thatcham without the proposed expansion. A link road will relieve congestion on A4 to the east and west. The 3 major neighbouring conurbations are Reading, Swindon and Basingstoke. A link to the M4 will provide easier journeys to the first two. Thatcham to Basingstoke to the South by road is full of obstructions. River, Canal, and Railway. A southern link road to the A339 is required. This link road could connect with a east- west road linking better with the A 34. This would relieve congestion in Newbury and bring Winchester, Southampton within easier reach. An outer ring road around Newbury and Thatcham would be created. This would create easier connections with the rest of the country whilst reducing congestion within what will, when combined with Newbury, be a large conurbation. A Link road from a new junction on the M4 near Yattendon, passing to the east of the Colthrop industrial estate crossing the railway, river and canal before connecting to the Southern connectivity described above is a must before any expansion of Thatcham can be considered. It should not be overlooked that logistics and distribution are major employers in Thatcham. Congestion is the enemy of those businesses. A development of this size needs local employment. It therefore important that the infrastructure is created to enable those businesses to</p>	<p>since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>



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	<p>thrive. Â The Railway whilst being a major east west connection is underused. With the correct investment it could be used to provide regular reliable environmentally friendly direct links to Bristol, Heathrow, Gatwick and London. It could also be used to provide better local links for employment and leisure in Newbury, Theale and Reading. A Parkway station should be considered where the railway crosses the A34 at Enborne. This will reduce parking demands and commuting traffic into Newbury Town centre. It would also help with Race Day congestion. The railway offers many passing points so that a frequent local service could become an environmentally strategic axis for West Berkshire. With trains running every 15 mins Park &amp; Ride facilities adjoining A34 at Enborne with possibilities for a new small village. In addition to the existing stations, a new station should be constructed close to new Racecourse bridge. This would serve the new housing and be close to Hospital. This link would offer new housing possibilities south of Colthrop with easy access to Thatcham Station. The Pedestrian route from Theale station to Calcot Retail Park should be improved. Facilities to change trains at Reading West need improvement to provide access to the new Reading Green Park station. This would create an east west public transport corridor that is environmentally friendly, encourages economic growth and opens up many potential sites for small housing opportunities that are near the stations. However, this results in an increase in train movements. This means a bridge over the Railway at Thatcham to relieve the level crossing becomes even more essential.</p> <p>Â Building the development without the necessary infrastructure to support it could lead to a reduction in employment not an increase. Conclusions The proposal to build 2,500 homes at Siege Cross is back to front. There seems no reason other than to satisfy a Government house building target. Can West Berkshire accommodate such a housing target? Only as part of a strategic economic plan that looks at what the alternative strategies are for the area, concluding the additional population / housing that it can accommodate and support. The plan will identify how Thatcham will develop. It goes without saying that additional homes will have to be built in and around Thatcham. The number and where should be determined by the strategic plan. To build 2,500 homes on one site and then try to satisfy the</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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	strategic requirements it creates is completely the wrong way around. Therefore I must object to the proposal.	
Gary Clarke (lpr697)	<p>Especially Thatcham SP17 A development on this sight was rejected as recently as 2017. The development is outside the centre of Thatcham and there is a serious mismatch between housing and economic strategies. A mismatch that will result in undue strain on infrastructure given the increased commuting that will be needed. This development is therefore unsustainable and inappropriate in direct conflict with the environmental goals outlined in section 3.5.</p> <p>Change proposed: A Council led plan to rejuvenate Thatcham Town Centre rather than a developer led plan to build on greenfields. Once a strong plan is in place for Thatcham then and only then can new housing in the area be considered.</p>	<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Nigel Colman (lpr371)	<p>As a local resident I would like to object in the strongest possible terms to the proposed development in NE Thatcham. This proposal is on a scale that is quite frankly ridiculous and would remove such a huge area of local green space that it must be rejected outright. Furthermore, the impact on local infrastructure and associated traffic volumes would be disastrous for the local area.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a</p>

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		'living document' and will be updated regularly updated in consultation with infrastructure providers.
Susan Brown (lpr373)	<p>I strongly oppose the WBC proposal for Thatcham North East and the development of 2500 houses and associated infrastructure. This would be a total overdevelopment of the site. It virtually abuts an AONB and erodes settlement boundaries. The impact on traffic and public transport links seems not to have been considered. The A4 is already very congested, particularly during rush hour and the likelihood is that this development would not only significantly worsen the congestion, but also result in increased traffic through the various villages to the north of the A4 including Upper Bucklebury, Chapel Row and Southend Bradfield, the main cut through routes used whenever there is an issue with traffic flow on the A4. Public transport wise there is no way that Thatcham station and the other small village stations along the A4 will be able to deal with increased passenger numbers. Parking at these stations is already totally inadequate. The need for additional education placements doesn't appear to have been thought through at all. 2 primary schools and 1 secondary school, given the size of the development area, seems a rather unusual way to cater for the education issues that will arise from the development. Our current local schools are already struggling to provide adequate education due to a total lack of funding. There is nothing strategic about this approach, it is piecemeal and ill considered. There is no mention of how health care will be provided. Local surgeries are already totally overstretched and the area only has a small community hospital rather than a fully functioning medical provision. There is no way that the current NHS provision will be able to cope.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.' The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary</p>

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		<p>and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>
Carol Gower (lpr 375)	A very important consideration is THE WATER SUPPLY. At Burdens Heath Upper Bucklebury we still have problems with the water Pressure, particularly in the Summer. Yet more demand is worrying to say the least.	<p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p>

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		<p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
<p>Gary Clarke (lpr698)</p>	<p>This development changes the character of Thatcham and destroys green fields in contradiction to all current thinking on new developments. A country park is NOT countryside and is not an acceptable substitute. Traffic is already at a standstill on Floral Way and the A4 in normal rush hour times and heavy lorries using the distribution centres on Colthrop Industrial estate add to transport issues in the area. The queues and pollution at the rail crossing at Thatcham will be made worse by the new development and the ensuing increase in commuter car journeys. The residents of the new houses are not at all likely to work locally and any plan that relies on hoping that they will is unacceptable.</p> <p>Change proposed: Brownfield sites should be used first and the Council should not be adopting a developer led proposal which is in the developers favour to the detriment of Thatcham residents.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>



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		<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p>

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		<p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Stephanie Molloy (lpr1286)	<p>Objection to proposed development of 2500 houses along A4 and Floral Way at Thatcham. I strongly object to the proposal to build 2500 House along the A4 and Floral Way in Thatcham, for the following reasons: 1: Reduction in the strategic gap between the settlements of Thatcham and Upper Bucklebury. 2: This is allowing urban sprawl - is the plan to join Thatcham, Cold Ash, Upper Bucklebury, Midgham and Woolhampton into one conurbation? Adding 2,500 homes is like adding the town of Hungerford onto the side of Thatcham. What ever happened to not building on the green belt? Many years ago when I told my father I was moving to Thatcham, he said it was a lovely pretty village, surrounded by green fields. I asked him when he was last here. Oh after the war he said! When he came to our then property in Thatcham he could not believe the change and was concerned it was now just part of Newbury. This cannot happen to the rest of Thatcham and its surrounding villages, especially Upper Bucklebury and Cold Ash. 3: Infrastructure impact - Road Traffic - Thatcham is already full of traffic, not just at peak times, adding 2,500 homes, with at least one car (but more than likely two cars per household) will add a minimum of 2,500 cars to the roads. A major increase in traffic along Harts Hill, Coxs Lane, etc., and any other cut through people use as they try to get onto the A4, will be heavily impacted to the detriment of the roads themselves; lifestyles of those living on those roads and congestion not just at peak times. 4: Infrastructure Impact - Railway Crossing - This is already not fit for purpose, having been</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and</p>

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	<p>designed when there was light traffic in the area. No plan to increase any domestic dwellings in Thatcham should go ahead until the crossing situation is fixed. 5: Infrastructure Impact - Schools - The suggestion is to build 3 new schools - how many are secondary schools, as Kennet School is already full, and The Downes has changed its catchment area so young people from Upper Bucklebury can go there instead just down the road. Traffic and impact on the neighbouring village schools needs to be seriously looked at too to stop them being overwhelmed and unable to offer places to children of their own village. 6. Infrastructure Impact - Doctors - All the Doctors practices are over stretched - not just because of COVID-19 - even with the current triage and use of new technologies it is difficult to get to see a Doctor on the day you need them. This needs to be factored in, in any development plan for Thatcham. 7. Infrastructure Impact - Water and Sewage - The local system is being managed on a daily basis by Thames Water. Woolhampton is already full with no plans to increase capacity - what is the situation in Thatcham? An additional 2,500 homes will require a lot of new pipework to get it to Lower Way safely, with months (if not years) of upheaval and disruption to local residents. 8. Infrastructure Impact - Rubbish, Landfill and Recycling - We all know this will be impacted, you only have to look at the current situation. What are the plans for doing this correctly and recycling more. Fly tipping on Bucklebury Common is rife and all the good people who go common clearing or litter picking, are only able to scratch the surface as our beautiful village land is used as a rubbish dump. 9. West Berkshire declared a climate emergency on 2 July 2019.  <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summarydocument-Â-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summarydocument-Â-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf</a>? m=637141844400230000  WBC - Environment Strategy - with declaration of climate emergency. How will this be mitigated by increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and urbanisation. 10. WBC Refusal for Application 15/00296/OUTMAJ Siege Cross Farm Thatcham - The proposal to build 495 dwellings was refused by WBDC, not least for being contrary to the Development Plan, the impact it would have on Education, the Landscape and Visual impact it would have and Planning Obligations. If 495 were refused how can 2,500 be being</p>	<p>adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>considered? <a href="https://www.newburytoday.co.uk/news/news/22093/very-strongmessage-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strongmessage-to-developers-after-thatcham-appeals-turned-down.html</a> 11. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern. 12. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West Berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ? 13. It will completely surround the Crematorium at Thatcham which was placed there to be away from residential properties and has constraints placed on it. 14. Have WBC considered the reuse of brownfield sites to house these 2,500 homes? Better use of Thatcham town centre, a review of the use of property should undertaken in light of the changes that have taken place since the COVID-19 disruption. 15. Flooding - Remember 20 July 2007? Most of Thatcham was impacted as it is built on a flood plain. If you were to build on the land proposed where does all the water go? If you remember the A4, Midgham and Woolhampton were badly impacted too by this flooding. The proposal is overdevelopment of Thatcham, which is already struggling to cope. It is out of character and will have a detrimental impact for the surrounding villages, the A4 and to the town itself. There is insufficient parking in the town, limited parking at the train station and already almost full train services at peak times into London. Doctors are stretched. Floral Way is used as a way to get round the town, as it is too painful to drive through it, with all the traffic lights. This will only get worse. The surrounding countryside is full of natural beauty, fauna and flora, which should not be disturbed. Walking on the land between Upper Bucklebury and Colthrop last summer, we saw orchids and other wild flowers with plenty of bees and butterflies to feed on them. Do not be responsible for destroying this beautiful habitat. Reading the BBC News Website today, there is an</p>	<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated</p>

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	<p>article by Prof Sir Partha Dasgupta, of the University of Cambridge, who has written a review for the Government. He states: "Truly sustainable economic growth and development means recognising that our longterm prosperity relies on rebalancing our demand of nature's goods and services with its capacity to supply them. "It also means accounting fully for the impact of our interactions with nature across all levels of society. <a href="https://www.bbc.co.uk/news/science-environment-55893696">https://www.bbc.co.uk/news/science-environment-55893696</a></p>	<p>water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary</p>

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		<p>infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the</p>

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		<p>separation and identity of individual settlements will be embedded into the design process.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p>

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		<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Piers Allison (lpr1955)	<p>I am writing about the Local Plan Review 2020 -2037. I am commenting in particular on the plan to build 2500 houses on land between north Thatcham and Upper Bucklebury (the Policy SP 17 "North East Thatcham Strategic Site Allocation"). I do not support your plans. It will all but join Thatcham to Bucklebury, thereby connecting a village within the AONB with the large Thatcham. It will damage the character of Bucklebury, result in increased damage to Bucklebury Common, increase usage of Bucklebury Ford with the resulting rubbish and damage to the River Pang. The development will not support your own vision and strategy to protect the AONB, with a development on its very boundary. It will degrade the AONB, so that it is becomes an Area of not quite such Outstanding Natural Beauty. Whilst your document "Local Plan Review 2020 -2037" makes some consideration for the AONB, it makes no reference to Bucklebury and 1 minor reference to Upper Bucklebury. Your document mentions no consideration to the impact of your proposed 'Thatcham extension' on Bucklebury Parish. Some specific points in your document: Thus the enlargement of the DEPZs has reduced the available West Berkshire non-AONB area by <math>54/182\% = 30\%</math>. West Berkshire Council should make representations to Government to argue for a reduced number of houses as a result of the DEPZ regulations coming in after the original demand calculations were made. The new provision should</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and</p>



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	<p>be for 6188-6842 (a reduction of 2652-2932 houses). In Policy SP4, West Berkshire is following the ONR's recommendation against development of 200 dwellings or greater from the larger Outer zone. If the reduction in available area due to that larger zone was to be considered, the number of houses in WBC's new provision should be even smaller. The DEPZs Within the section "What has happened so far?" you refer to the previous consultations conducted in 2018 and February 2020. However those were conducted before the Aldermaston and Burghfield DEPZ areas were extended, and thus the validity of those consultations is now questionable. Protection of the AONB Within your vision and strategy, you seek to protect the AONB (which I admire): "Our vision: West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside." "Strategic Objectives: Together with partners, to continue to conserve and enhance the North Wessex Downs AONB, with appropriate landscape-led development delivering wider environmental, economic and social benefits." However, by planning for a new development of 2500 homes, up to the very boundary of the AONB, you introduce the high risk of doing the opposite of your vision and strategic objectives. The population of the extended Thatcham will overspill into the Bucklebury area of the AONB. It will increase the damaging 4x4 traffic on Bucklebury Common, put more cars into the narrow single track lanes that wind down from the Cold Ash - Upper Bucklebury ridge into the Pang Valley, send more people down to the recreation ground and playground in Bucklebury Village, add to the numbers of people who 'play' around Bucklebury Ford and who litter the River Pang. Within your section on development INSIDE the AONB (Policy SP2), you write: "If the proposal is considered to be major development, then the second part of the policy will apply and the following factors, as set out in the policy, will be taken into account: Detrimental effects on the environment, including wildlife and cultural heritage Your Policy SP2 applies to development within the AONB. It should equally apply to development adjacent to the AONB, where the development's residents will overspill into the AONB. Whilst the houses can't move, the people will. Your plan for 2500 homes adjacent to the AONB will not protect the AONB. Previous Land Character Assessment (2002) In Policy SP8, you say that "Proposals for development should be</p>	<p>the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation</p>

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	<p>accompanied by an appropriate landscape assessment". In the supporting text, you reference the "North Wessex Downs AONB Landscape Character Assessment (2002)". That assessment (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=40260&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=40260&amp;p=0</a> ) considered a development on the northern edge of Thatcham. That assessment concluded: "Conclusion and cumulative effect of all THA sites (THA011, THA014 and THA027) and the potential cumulative impact on Thatcham and Cold Ash. It is recommended that the above three sites should only be considered further as a whole, limiting development to the slopes below 95m AOD. If any one of the sites were to be developed in isolation this would result in an unacceptable level of expansion of Thatcham north of the well defined settlement boundary along Bowling Green Road and Heath Lane. In the light of modern housing along the lower slopes of Cold Ash Hill, the low visibility of those parts of the sites close to the settlement and the more suburban character of these particular areas, the recommended reduced developable areas shown in THA0011.2, THA014.2 and THA027.2 could be justified in landscape and visual terms. However it is particularly important to limit the northern expansion of this area in order to retain the separate identities of Cold Ash and Thatcham, to retain the open rural character of the open countryside between the two settlements and to prevent further intervisibility between the built forms of each settlement." Yet in your proposal to join north Thatcham to Upper Bucklebury, you may make no such equivalent consideration. Your proposal has development up to 125m AOD. You make no equivalent comment that "However it is particularly important to limit the northern expansion of this area in order to retain the separate identities of Bucklebury and Thatcham, to retain the open rural character of the open countryside between the two settlements".</p> <p>Change proposed: I trust that West Berkshire Council will: 1. Seek a reduction from Government on the target number of homes to be built as a result of the enlargement of the DEPZs. 2. Changes its plans so that there are no new large development adjacent or almost adjacent to the AONB.</p>	<p>to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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Piers Allison (lpr485)	<p>I am writing about the Local Plan Review 2020 -2037. I am commenting in particular on the plan to build 2500 houses on land between north Thatcham and Upper Bucklebury (the Policy SP 17 "North East Thatcham Strategic Site Allocation").</p> <p>I do not support your plans. It will all but join Thatcham to Bucklebury, thereby connecting a village within the AONB with the large Thatcham. It will damage the character of Bucklebury, result in increased damage to Bucklebury Common, increase usage of Bucklebury Ford with the resulting rubbish and damage to the River Pang. The development will not support your own vision and strategy to protect the AONB, with a development on its very boundary. It will degrade the AONB, so that it becomes an Area of not quite such Outstanding Natural Beauty.</p> <p>Whilst your document "Local Plan Review 2020 -2037" makes some consideration for the AONB, it makes no reference to Bucklebury and 1 minor reference to Upper Bucklebury. Your document mentions no consideration to the impact of your proposed 'Thatcham extension' on Bucklebury Parish.</p> <p>Some specific points in your document:</p> <p>Thus the enlargement of the DEPZs has reduced the available West Berkshire non-AONB area by <math>54/182\% = 30\%</math>.</p> <p>West Berkshire Council should make representations to Government to argue for a reduced number of houses as a result of the DEPZ regulations coming in after the original demand calculations were made. The new provision should be for 6188-6842 (a reduction of 2652-2932 houses). In Policy SP4, West Berkshire is following the ONR's recommendation against development of 200 dwellings or greater from the larger Outer zone. If the reduction in available area due to that larger zone was to be considered, the number of houses in WBC's new provision should be even smaller.</p> <p><b>The DEPZs</b></p> <p>Within the section "What has happened so far?" you refer to the previous consultations conducted in 2018 and February 2020. However those were conducted before the Aldermaston and Burghfield DEPZ areas were extended, and thus the validity of those consultations is now questionable.</p> <p><b>Protection of the AONB</b></p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The LPR goes through a series of consultations in its production, the amendment of the Aldermaston and Burghfield DEPZ boundary does not result in previous consultations being void. However, what it does mean is that this new position has to be considered through the LPR which the Council has done in the Regulation 18 consultation and will continue to do so through the</p>

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	<p>Within your vision and strategy, you seek to protect the AONB (which I admire):</p> <p>"Our vision: West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside."</p> <p>"Strategic Objectives: Together with partners, to continue to conserve and enhance the North Wessex Downs AONB, with appropriate landscape-led development delivering wider environmental, economic and social benefits."</p> <p>However, by planning for a new development of 2500 homes, up to the very boundary of the AONB, you introduce the high risk of doing the opposite of your vision and strategic objectives. The population of the extended Thatcham will overflow into the Bucklebury area of the AONB. It will increase the damaging 4x4 traffic on Bucklebury Common, put more cars into the narrow single track lanes that wind down from the Cold Ash - Upper Bucklebury ridge into the Pang Valley, send more people down to the recreation ground and playground in Bucklebury Village, add to the numbers of people who 'play' around Bucklebury Ford and who litter the River Pang. Within your section on development INSIDE the AONB (Policy SP2), you write:</p> <p>"If the proposal is considered to be major development, then the second part of the policy will apply and the following factors, as set out in the policy, will be taken into account:</p> <ul style="list-style-type: none"> <li>• Detrimental effects on the environment, including wildlife and cultural heritage..."</li> </ul> <p>Your Policy SP2 applies to development within the AONB. It should equally apply to development adjacent to the AONB, where the development's residents will overflow into the AONB. Whilst the houses can't move, the people will.</p> <p>Your plan for 2500 homes adjacent to the AONB will not protect the AONB.</p> <p><b>Previous Land Character Assessment (2002)</b></p> <p>In Policy SP8, you say that</p> <p>"Proposals for development should be accompanied by an appropriate landscape assessment".</p> <p>In the supporting text, you reference the "North Wessex Downs AONB Landscape Character Assessment (2002)". That assessment</p>	<p>progression of the LPR when new information/ evidence is published.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between</p>

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	<p>(<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=40260&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=40260&amp;p=0</a>) considered a development on the northern edge of Thatcham. That assessment concluded:</p> <p>"Conclusion and cumulative effect of all THA sites (THA011, THA014 and THA027) and the potential cumulative impact on Thatcham and Cold Ash. It is recommended that the above three sites should only be considered further as a whole, limiting development to the slopes below 95m AOD. If any one of the sites were to be developed in isolation this would result in an unacceptable level of expansion of Thatcham north of the well-defined settlement boundary along Bowling Green Road and Heath Lane. In the light of modern housing along the lower slopes of Cold Ash Hill, the low visibility of those parts of the sites close to the settlement and the more suburban character of these particular areas, the recommended reduced developable areas shown in THA0011.2, THA014.2 and THA027.2 could be justified in landscape and visual terms. However it is particularly important to limit the northern expansion of this area in order to retain the separate identities of Cold Ash and Thatcham, to retain the open rural character of the open countryside between the two settlements and to prevent further intervisibility between the built forms of each settlement."</p> <p>Yet in your proposal to join north Thatcham to Upper Bucklebury, you may have made no such equivalent consideration. Your proposal has development up to 125m AOD. You make no equivalent comment that "However it is particularly important to limit the northern expansion of this area in order to retain the separate identities of Bucklebury and Thatcham, to retain the open rural character of the open countryside between the two settlements".</p> <p>Changes: I trust that West Berkshire Council will:</p> <ol style="list-style-type: none"> <li>1. Seek a reduction from Government on the target number of homes to be built as a result of the enlargement of the DEPZs.</li> <li>2. Change its plans so that there are no new large development adjacent or almost adjacent to the AONB.</li> </ol>	<p>them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against</p>

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		substantially higher numbers than the housing need based on the standard methodology.
Jane Halliday (lpr625)	<p>SP17 NE Thatcham. The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties and will not be able to cope with additional ones.</p> <p>Proposed change: Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</p>	<p>THE LPR will form part of the Development Plan for West Berkshire and all the relevant policies contained within the document will be utilised by officers when determining planning applications.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>All sites which have been submitted to the Council for allocation have been considered. A site must be available, achievable and suitable to be allocated.</p>
Peter West (lpr720)	<p>I think Thatcham is already over-developed. Many people prefer to live in Thatcham over Newbury because it is smaller, quieter, has less bustle and less traffic away from the A4. Adding an extra 2500 dwellings would fundamentally change Thatcham for the worse. I want Thatcham to retain its 'large village' atmosphere. I also disagree with the findings of the 2020 Thatcham masterplanning study - this is the first I've heard of it. I have also commented on the Review of Settlement Boundaries at Appendix Three. These comments form part of the reasons why I am objecting to the proposed policy.</p> <p>Proposed change: I consider north east Thatcham "the area shown on the plan - is not a suitable location for strategic large scale development. It is too far away from the centre of Thatcham and will lead to large numbers of extra car journeys</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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	<p>on Floral way, Harts Hill Road and on the A4 through Thatcham. Large areas of existing housing ‘ particularly streets off Floral Way (eg Foxglove Way, Trefoil Drove, Simmons Field, Archangel Way) and streets off Falmouth Way (eg Bolingbroke Way, Ashman Rd) would be subjected to 15 years of noise and disruption from building work and roadworks. If any area of Thatcham needs to be examined for further development, it should be in the south east quadrant, south of the railway line. Because some of this land is in a flood plan, areas slightly higher up Crookham Hill - land around Highfield and Waterside copses should also be considered. development in these areas would be closer to Thatcham rail station and a similar distance to the existing town centre as the north east sector proposed housing. There would be less intrusion - building noise, roadworks etc - to existing housing. Any development plan for the south east quadrant could also deliver the one piece of infrastructure urgently needed in Thatcham - a road bridge over the railway at Thatcham Station.</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



Respondent (with lpr ref)	Response	Council Response
Simon Tonkyn (lpr692)	<p>1/ You state (Ref 6.36) that Thatcham has grown 5 times its size since 1951 and reflecting that the social infrastructure has not grown in synchronisation with this. I struggle to understand the logic therefore of how adding more than 2500 houses would improve the situation. Would it not make sense to resolve this for the existing housing stock before adding thousands more houses into the mix?</p> <p>2/ How exactly would on-site renewable energy assist in the delivery of a carbon neutral development. Where is the supporting evidence and surely no development by definition would deliver this outcome. Also how many additional vehicles (many not electric) would be added to the local road network further increasing emissions and pollution with potential detrimental health impacts?</p> <p>3/ You talk about appropriate vehicular accesses and sustainable transport through routes and yet even before any of this is considered traffic heading in and out of Thatcham via Thatcham station is routinely stationary for up to 40 minutes causing traffic at times to be backed up all the way to the A4. It is reasonable to assume that a significant proportion of working people living in this development would be working in locations that would make this the most likely route they would take to their place of work. This would further exacerbate the delays and pollution caused by cars and lorries leaving their engines running. There are already proven cases of deaths resulting from vehicular pollution and this proposed development would be a direct contributor to increasing rather than reducing pollution and how would this contribute to the target of carbon net zero by 2030 announced by West Berkshire Council?</p> <p>4/ The A4 between Thatcham and Theale is a well-known accident hotspot, so much so that the council have placed signs warning drivers of the dangers of the road. With more warehousing being built responding to the move away from normal retail outlets this can only get worse as more and more lorries use this road causing more congestion, more pollution and in turn more risks of accidents and risk to life. The proposed development will be at the two pinch points where all this HGV traffic enters the industrial estates and this can only increase the accident risk further and increase the dangers for pedestrians who use the existing pavements on the A4 in the area for exercise.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Being carbon neutral means having a balance between emitting carbon and absorbing carbon from the atmosphere in carbon sinks. Removing carbon oxide from the atmosphere and then storing it is known as carbon sequestration. In order to achieve net zero emissions, all worldwide greenhouse gas (GHG) emissions will have to be counterbalanced by carbon sequestration.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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	<p>5/ You state that there will be a biodiversity net gain. How can that possibly be the case with so much habitat destruction and the loss of existing paths and green space. Destroying an area of this size cannot possible result in a biodiversity net gain.</p> <p>6/ Once the Covid-19 pandemic restrictions are lifted traffic in the area will return to pre-pandemic levels and all the resultant traffic congestion that was there is all directions beforehand. The location of this proposed development, without large scale infrastructure improvements including a bridge over Thatcham railway crossing, will just eacerbate this. In addition the increase of traffic using Crookham Hill (which is a very narrow road) can only but increase the risk of accidents and injury.</p> <p>7/ There is no evidence I am aware of that the trend away from retail outlets in town centres is going to change. In fact the opposite is happening. Isnt it much more likely that to satisfy the demands of 2,500 more homes that instead of retail outlets and some character in Thatcham town centre it will just become larger and large supermarkets and even more soulless. In conclusion I would say that Thatcham having grown 5 times since the 50's has contributed enough to the demands for increased housing and this development further erodes the very character this seeks to enhance and should not proceed.</p> <p>Change proposed: West Berks Council have been quoted as saying that certain road improvements would not actually improve congestion rather just increase the volume of traffic thereby negating any benefit. This huge development may well be sold quickly and add several thousand more families into an area already over developed and though I admit to having no expert knowledge amd of the opinion (just like the road improvements) have no net benefit and this need could be satisfied in other locations causing less impact to peoples lives and the environment.</p>	<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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		<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further</p>

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		<p>updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>
Joanna Brass (lpr1241)	<p>I and my family are very concerned about the proposed development of the beautiful green belt land between Upper Bucklebury and the A4/Floral Way. A development of 2,500 houses in the green spaces of Thatcham seems unreasonable. We have two main reasons: (i) concern for the existing under-invested Thatcham town and (ii) loss of the beautiful and locally important green belt. I'll start with the green belt issue. Our first reaction to the news of the development was of complete surprise, as it runs contrary to what we understand to be the Central Government's most basic national planning policy: to preserve green belts! The fundamental aim of the policy as we understand it is to prevent urban sprawl by keeping</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern</p>

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	<p>land permanently open. It is essential to allow the land in question, or as much of to as possible, to remain as green belt to (i) check the unrestricted sprawl of Thatcham up into the area of outstanding natural beauty and rural character that is Bucklebury Common and its surrounding area, (ii) stop Thatcham merging into Upper Bucklebury, (iii) assist in safeguarding the countryside from encroachment, (iv) preserve the setting and special character of the hamlets and small villages in the Bucklebury area, and (v) assist in urban regeneration, not just in Thatcham but also in Newbury, by encouraging the recycling of derelict and other urban land. Our decision to live in the woods near Midgham/Upper Bucklebury was heavily influenced by the rural character of the surroundings including the existing green space separating it from Thatcham (including the part that it is now proposed to build on). We enjoy it at least weekly, regularly walking our dogs on various footpaths in the vicinity. To change the area in the way proposed is entirely unacceptable. It would mean the loss of a much loved green space, visually damaging the existing landscape around the currently undeveloped side of Floral Way, it would mean the loss of a much loved rural landscape, disrespect the idea of a settlement boundary between Thatcham and Bucklebury, trigger the loss of trees, hedgerows and other vegetation that are essential for wildlife, and represent the over development of Thatcham. Our concern for Thatcham. We do not live right in Thatcham, but consider it our main town and in normal (ie not lockdown) times we are in and out of it multiple times a day. There seems to us to have been a failure over many years to invest in the Thatcham area and its most basic infrastructure - the town centre, roads, public transport, schools, GP surgeries, leisure facilities, maintained green spaces, youth facilities, care support and community centres are all under strain and all need work. These are all needed for our community to prosper and have all been neglected over a prolonged period of time. A new development will not fix any of this. Nobody who truly knows Thatcham would believe that the town could support an expansion of 2,500 new houses. The transport links were at full capacity (pre-Covid/lockdown) with terrible peak time congestion on the A4. The last thing the town needs is thousands of extra cars compounding these problems - on top of competing with the HGV's from the industrial area and distribution centres which already attract the massive lorries and the</p>	<p>and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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	<p>pollution they bring. We note that WBC's strategy of 2012 identified that, after a period of rapid housing growth, the infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration nor significant new facilities, all we are aware of is the spending on the flood defence work; so presumably the (what seemed to us logical and sensible) conclusions of 2012 still stand? The focus in and around Thatcham should continue to be on building a strong community, and making Thatcham a safe, healthy and great place to live, where everyone has access to the services they need. The idea of a country part-type development linking Thatcham up into the surrounding AONB is a good one - although I'm not sure it is actually necessary as the walkers, cyclists and family of Thatcham are already well evident up and around the green belt and extending all the way up into the quiet lanes of Bucklebury Common on fine weekend days during lockdown. It serves as a beautiful green/rural/woodland escape for many from the urban streetscapes of existing Thatcham and accessibility does not actually seem to be much of a problem, judging by the increase in (foot) traffic. I would argue that it serves to benefit the physical and mental health of Thatcham residents as it is. Perhaps some public transport options up Harts Hill Road would help make it more accessible - in other countries they might run a street tram up into such areas on weekend days, for example. There are so many ways to make Thatcham a better place to live, without building over the very green spaces that its residents already use to escape into, or even just breathe a little more deeply as they enjoy the views from their cars along the A4 and Floral Way. I sincerely hope that sanity prevails in this matter.</p>	<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		and lifestyle choices will be important elements of the overall transport plan.
Ian Halliday (lpr624)	<p>SP17 NE Thatcham. The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties and will not be able to cope with additional ones.</p> <p>Proposed change: Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</p>	<p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Tim Hall (lpr652)	<p>This is an unsustainable location.</p> <p>Proposed change: As this is unsustainable (it would, without any reasonable doubt, become an essentially car-dependent location) and especially with the declared Climate Emergency it could never be consistent with Council policy. Moreover it takes a beautiful and productive greenfield location and should not even be considered as an appropriate development location. Elsewhere I have suggested that fresh research and thinking is needed about retail and employment allocations and the potential elsewhere in built up and brownfield areas for housing.</p>	<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p>



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Louise Clarke (lpr819)	<p>The proposed development is predicated on a speculative increase in employment within the immediate area. This is unlikely and most residents will probably commute, increasing traffic on local roads. Increased traffic adds to pollution. The level crossing is a bottleneck and leads to increased air pollution as vehicles are idling and it is also damaging to local businesses. The proposed sites are all greenfield sites and these should not be developed because a) they provide habitat for native wildlife, b) access to countryside is important for the well-being of local residents, c) the separation between Thatcham, Midgham and Bucklebury Common will be eroded by development in these areas, d) increased runoff from the proposed development will add to the flooding risks for the rest of Thatcham and Midgham. The proposed 'country park' is no replacement for actual countryside. I have personally seen hares in the easternmost proposed site. These proposals seem to be developer led and don't address the needs of the current and future needs of residents. Being on the outskirts of Thatcham, they do nothing to address the need to revitalise the centre of Thatcham.</p> <p>Proposed change: Revitalisation of the centre of Thatcham should be preferred to any development on the outskirts. Brownfield sites should be used before any considerations of developing greenfield sites. The longer term effects of Brexit and the pandemic should be considered. Climate change must be addressed and all developments should reach the highest standards of sustainability, especially if they are being proposed on greenfield sites.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water</p>

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		<p>and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19</p>

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		<p>pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>

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Jonathan Alderman (lpr550)	<p>I only support SP17's policy inclusion of the following item: "On-site renewable energy to assist in the delivery of a carbon neutral development" IF the chosen technology is capable of demonstrating its Green credentials. I do not support CHP plants burning plastic or waste wood, i.e. high CO2 emission fuel, as their feedstock. These types of electricity generation plants also rely on their feedstock being delivered by HGV, which could be as many as 20 HGVs daily, every day of the year during the lifetime of the plant. These HGVs are also a source of polluting emissions, which will impact on Air Quality and the health of local residents.</p> <p>Proposed Change: The change I am seeking is that any On-site renewable energy plant must demonstrate its Green credentials, e.g. the deployment of Carbon Capture and Storage technology and be fuelled by low CO2 emitting fuel (LPG, Natural Gas or Hydrogen).</p>	<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>
Graham Storey (lpr579)	<p>The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties, never mind additional ones.</p> <p>Proposed Change:</p>	<p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The</p>

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	<p>The Colthrop industrial estate should become a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for affordable and social housing.</p>	<p>policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
David Carrier (lpr632)	<p>Our comments relate to the proposed building of 2500 houses to the north east of Thatcham. We are very opposed to this on the basis of:</p> <ol style="list-style-type: none"> <li>1. It is not sustainable as a way forward for this area, this country and indeed the world to continue to build upon our very important &amp; precious green space for ecological &amp; conservation reasons. It may be easier &amp; cheaper to do this but that does make this a right decision.</li> <li>2. It's proximity &amp; therefore impact upon the adjacent aonb. It will give rise to greater traffic flows through narrow &amp; winding lanes, increased usage of the recreation ground in Bucklebury village and more litter, misuse and damage to the ford &amp; river. In addition, it will vastly increase the number of people making use of Bucklebury Common. This is an ecologically sensitive area.</li> <li>3. This development will breach the desired gap between Thatcham &amp; Upper Bucklebury turning it into one sprawl. WBC has the maintenance of suitable gaps between developments as one of its planning policies &amp; this development would fly in the face of this. David &amp; Fiona Carrier, Bucklebury village.</li> </ol> <p>Proposed change: Every effort should be made to not build on greenfield sites but instead use brown field sites &amp; to explore the re generation of town centres which will continue to decay as shopping habits change.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

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Michael Morrison (lpr388)	<p>would like to register my strong objection to the NE Thatcham development (Policy SP17) which would effectively place a small town with a population the size of Hungerford to the North East of Thatcham, with only two schools, a few shops and the later arrival of a surgery. This will result in extra pressure on the already overloaded surgeries of Chapel Row and Burdwood. Hungerford has numerous shops, a library, schools, doctors surgeries, pubs and a large supermarket to serve the population there.</p> <ol style="list-style-type: none"> <li>1. Lack of publicity. I understand that a large number of the residents of Upper Bucklebury are against the development but it appears that WBC has not mailed anyone or made any attempt to contact ratepayers individually. This surely must seriously affect the validity of the consultation, as most of the local residents are still unaware of what is being proposed. I was made aware by a post on the local community facebook page only a few weeks ago. I am sure there are many many residents who have not commented, because they do not know about the plans.</li> <li>2. Flooding is a major concern, and Sue Everett, an environmental consultant who prepared that last report on flooding for the Thatcham council, said to a local resident recently (and she approved the use of this phrase in an email she sent) It would be utter madness to build on that slope Meaning the whole of the site which is on the slope' that runs down to Colthrop and Thatcham. Run off would be a serious problem and would certainly flood Thatcham and Colthrop with heavy rain, even with mitigation measures.</li> <li>3. Overdevelopment near the AONB despite national measures to preserve the countryside and its amenities</li> <li>4. The proposal makes no mention COVID and the substantial changes to housing and development requirements because of the pandemic. It rather looks like the proposal is outdated. With city centre shops closing, surely a possible solution might be to convert Newbury town centre empty retail buildings to residential? All would be within walking distance of the station, should travel be need to Reading and London.</li> <li>5. Carbon neutral. There is no stipulation that the building will comply with the latest construction and environmental standards. Namely Carbon neutral, or at least net zero emissions, and also be in line with the upcoming legislation [ due out in 2023 ] on Biodiversity Net Gain [ BNG ] Both are</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p>hugely important and I believe that WBC have committed to carbon net zero emissions by 2030. This development will not work towards that objective at all.</p> <p>6. Wildlife will be seriously affected by such a massive intrusion into the countryside. Bats, badgers, hedgehogs, and other protected species would all be in danger.</p> <p>7. Local water supplies show very varied water pressure, even after the installation of the new Harts Hill pumping station, we have had very low pressure today here in upper Bucklebury. Surely the supply will be completely inadequate for a development of this size. The local character of the area has changed enormously over the 40 odd years I have lived in Bucklebury, This plan will further degrade the countryside and will overload water, sewage, road and rail systems. I firmly believe that it should not be approved in much the same way as the smaller development was turned down in 2017. From the Newbury Weekly News in August 2017: "The Government's decision to turn down two appeals " which would have resulted in more than 700 homes being built in Thatcham is a strong warning to developers. That was the message from West Berkshire Council's executive member for housing, Hilary Cole (Con, Chieveley), after the crucial ruling. As reported in the Newbury Weekly News, the secretary of state for communities and local government, Sajid Javid, stepped in to overturn the Planning Inspectorate's decision to approve the 495 and 225 home schemes at Siege Cross and Henwick Park. This development surely needs the same decision: Rejection. Thank you</p> <p>Proposed change: Please see my submission above. The plan needs to be reconsidered in light of all the objections and the effect COVID has and will have on the local area and its housing and transport needs.</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency</li> </ul>



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		<p>and minimise the impact of all forms of travel on the environment.</p> <ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated</p>

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		water supply and drainage strategy which will consider existing related infrastructure on the site.
Nataliya Topliss (lpr794)	<p>The proposed 2,500 homes development is completely out of character for the area and will have adverse affect of our countryside. !70 acres of green land will be forever destroyed by West Berkshire council's plans.</p> <p>Proposed change: West Berks Council's strategy of 2012 indentified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand. We need more green spaces in Thatcham. Thatcham's green spaces have been taken for housing developments.</p>	Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Alison and Richard Hubbard (lpr891)	<p>We would like to register our objection to the Proposal To Build 2500 Houses in NE Thatcham by 2036 Our grounds for objection are: The development proposed will create a large increase in traffic through Upper Bucklebury which will endanger pedestrians from both pollution and speeding vehicles. Broad Lane is widely used by both adults and school children in a manner which is encouraged by our government. The aim is to reduce our carbon emissions and create a cleaner healthier environment. Increased traffic flow will fly in the face of these anti pollution initiatives.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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		modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Paul Dalgarno (lpr926)	I am writing to you on behalf of myself and my family to voice our utter dismay at the proposal of an additional 2,500 to be built in Thatcham and register our objection, we believe that this development is poorly conceived and appears to be being railroaded through by WBC (with even Thatcham Town Council reportedly having no visibility of the Local Plan before its publication) with an incredibly quick timeline which I am sure is not best practice for such a considerable development. I believe that this development has the potential to have a largely negative impact on the local area both in terms of environmental impact and the quality of life of the local residence. My areas of concern are as follows: Thatcham is already a dormitory town with the A4 largely solid with traffic and peak times in the very area that this development is being proposed. This development is very likely to future exacerbate the poor road network in Thatcham and does little to nothing to help the town develop some essential services. Schools: The plan incorporates provision for a new primary schools which I believe has the potential to have a negative impact on Bucklebury Primary School and the wider community, it is known that for a village to have a heart it requires a number of key features, i.e. a school, a shop and a pub, however, I can easily envisage that when two new primary schools are built within close proximity to Bucklebury, Bucklebury school will become superfluous and will likely be closed, leading to further housing development within the village and loss of village character. The local NHS health centre is already overstretched, with the development this will further stretch these services which will overspill into the surrounding area services, causing further disruption. There is nothing in this plan that will help with the impact of the increased population. The railway line, Thatcham crossing is already a major bottleneck for the town with cars regularly queuing for 20 minutes or more waiting to cross, I believe that with the addition of a further circa. 10,000	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.

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	<p>people and their vehicles the already large queues could fill further back and potential causes further delays on the A4 and surrounding area. Type of development, according to the ONS in 2018, there were 1.6 million people aged 85 years and over; by mid 2043, this is projected to nearly double to 3.0 million. This change in population size / age does not appear to have been a consideration in terms of type of proposed housing and the needs of the local demographic. Impact on Upper Bucklebury: The traffic through the village has steadily increased with each passing year and was noticeably impacted by the opening of the Northern relief road, given that the A4 is already very busy at peak times I feel that it is inevitable that traffic through the village will increase further. The increase in traffic will have a detrimental impact on the village and, as the road has no lighting, will become increasingly dangerous to the many cyclists / pedestrians that enjoy the local area. In short, I think that this is a poorly conceived plan, and it is wholly unreasonable. I fully appreciate that housing across the county may be required, however, I do not believe that it is wise or reasonable to put a large number in one place and expand Thatcham by approx. 25%. I urge you to seriously re-consider, We personally feel that it would be far more beneficial to spread the growth evenly throughout the county rather than one large development.</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
Sandra Parker (lpr726)	<p>I think Thatcham is already over developed. The proposed development is outside the settlement boundary. This area is open farm land which is much appreciated by local residents. This proposal will mean years of disruption, noise and pollution for local residents. The one piece of urgent infrastructure Thatcham needs is a bridge over the railway line. Not only will this development not provide this but it will make it an even bigger problem as there will be increased traffic using this route.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>Proposed change: smaller developments no change to settlement boundary retain fields and open countryside</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Elaine Pearson (lpr1198)	<p>I would like to object to the proposed NE Thatcham development of 2500 homes for a number of reasons.</p> <p>My concerns are mainly because of the large size of the development and include:</p> <ul style="list-style-type: none"> <li>• the roads being inadequate and therefore unsafe for the number of extra cars e.g. Harts Hill, which already has more than its fair share of accidents. Traffic queues at the roundabouts will be increased, particularly at peak times, and lead to dangerous tailbacks</li> <li>• the shortage of footpaths in many of the villages nearby, meaning pedestrians (including children walking to school) and cyclists will be more at risk</li> <li>• the increase in traffic over the railway and roads leading to the railway– already a gridlock at peak times</li> </ul>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements</p>

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	<ul style="list-style-type: none"> <li>• the car parking in Thatcham being very limited; it will become impossible for people wanting to use the shops and local businesses</li> <li>• the increased number of people using Thatcham station, which has no facilities</li> <li>• the impact on the nearby AONB – with litter increasing and people detrimentally affecting the wildlife areas.</li> <li>• the provision of schools not being sufficient to allow children to get their choice locally. Children around Bucklebury and Cold Ash (and even Thatcham) may have to travel much further away.</li> </ul> <p>I very much hope you will consider reducing the size of this new development and/or moving it further along the A4 towards Reading to an area where it could have a less negative impact.</p>	<p>being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Clive Tombs (lpr133)	<p>The area identified under policy SP17 appears to offer the potential to deliver large scale residential development adjoining the established urban area of Thatcham and also close to the existing employment area at Colthrop.</p> <p>There needs to be much more emphasis placed on delivering and maintaining physical measures and service improvements, to ensure sustainable transport means are primarily used for local travel between (a) the proposed new development at North-East Thatcham (b) the established town centre and (c) Thatcham Station. As well as wide, uninterrupted, well-signed footways and cycleways, there needs to be high-quality bus services - operating to simple routes at at least 30 minute frequency, with proper supporting infrastructure e.g. waiting shelters, and properly subsidised for a minimum of 5 years in order that they can be allowed to grow patronage - providing connections between the proposed new development, town centre, Hospital and Newbury (and at least allowing interchange with the core Jet Black bus service to/from Reading, if not affording direct services to Reading), and also between the development, business area/Pipers Way and Thatcham Station at least at peak times. It is important that these provisions are made and fully-funded to provide a quality service for the long-term - otherwise there is a risk of ending up with car-dominated areas</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning</p>

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	<p>such as the existing Floral Way estates where the bus connections appear to have only been delivered in a half-hearted way for a short period after those estates were built.</p> <p>Full consideration also needs to be given to adequate measures to fully address the likely impacts on the highway network associated with travel further afield, especially from the development (and the wider Thatcham area) to Basingstoke/M3 as well as to A34/M4.</p> <p>While construction of a bridge to replace the level crossing, and upgrading of the road infrastructure from east of Thatcham via Crookham Hill to the A339 may be unpalatable to some and is reportedly extremely expensive, this may be essential to allow for the level of travel demand between Thatcham and Basingstoke/M3, without the extensive delays at the current level crossing or impacting on Newbury.</p> <p>Completion of the Thatcham Northern Distributor Road to a consistent standard should also be brought into consideration, rather than relying on the NDR using a sinuous, old portion of Bowling Green Road. Further, consideration should be given to whether the A4 through Newbury has sufficient capacity to carry traffic from the proposed new development through to the A339 and on to the A34/M4, or whether additional provision is required.</p>	<p>and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
<p>Tony Howels (lpr887)</p>	<p>I feel obliged to make it known that I strongly object to the proposed North East Thatcham development of 2500 new homes!</p> <p>The local infrastructure will simply not cope well with such a huge development and Thatcham town centre is not a large enough town to absorb the extra demand that would be imposed upon it. This is terrible news for the local communities!</p> <p>Also, Thatcham railway station does not have enough capacity for parking to cope with the increase in commuter demand.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>



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	<p>Additionally, destroying the beauty of the surrounding countryside and wildlife habitats, not to mention the pleasure locals get from walking these beautiful areas, would be outrageous! This beautiful area would be lost forever!</p> <p>The local area has a history of serious flooding and while there have been improvements in the form of controlled water storage and release this will be compromised by such an obscenely large development.</p> <p>The supply of potable water to the Bucklebury communities has been a huge problem in recent years and even with the recent upgrades inconsistencies still exist in the fluctuating water pressures. Can Thames Water even accommodate such a huge increase in demand on its water supply?</p> <p>Further, the additional sewage from such a large development will also present the water authorities with a substantial headaches in developing a suitable sewage treatment plan.</p> <p>Regarding Harts Hill Road, North of Floral way, it is not a road suitable for the expected increase in traffic with its many bends and restricted road width it will make travel along this section of road treacherous, particularly for cyclists.</p> <p>It will be a very sad day if this beautiful countryside was lost to this outrageous proposal and of course it would be lost forever!</p> <p>Another issue I anticipate is the increase in traffic using Broad Lane between Upper Bucklebury and Chapel Row, currently a very fast "rat-run" for those preferring to avoid the A4.</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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		<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Cara Shearn (lpr956)	<p>My concerns regarding the proposed Thatcham development are:</p> <ul style="list-style-type: none"> <li>- the increase in traffic through Upper Bucklebury village. The current attempts to reduce speeding traffic are ineffective. More traffic will only make walking through the village less safe and more increase noise levels.</li> <li>- the potential traffic back up at rush hour both on the A4 going into Reading and attempting to cross the level crossing.</li> <li>- the lack of any plan to address the increase in cars parking at the station as surely more people will be commuting into London especially with the current trends of people moving out of London and commuting in.</li> </ul>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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	<p>- the infrastructure is limited with no medical centre proposed and will only benefit those who live in the new development rather than the existing community. We already have countryside to walk in and local shops.</p> <p>- Kennet school is already straining with pupil nos. So would the secondary school be built before any houses? Otherwise where will the slack be taken up.</p> <p>- This site covers the area that is supposedly safe and short enough for village children to walk to Kennet and why West Berks justified us losing the bus service to Kennet. Does West Berks continue to think it will be safe enough once it is a building site?</p> <p>- This is a huge increase to the population of Thatcham and will fundamentally change its small town feel.</p> <p>For these reasons I do not support the proposed development.</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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		<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Annie Jury (lpr960)	<p>I'm writing this email to object to the planning application of 2500 houses in Thatcham from floral way to the crematorium, objections are this will increase traffic which is already so bad, will ruin our rural community in Upper Bucklebury and this is way to many houses. Schools and doctors surgeries are struggling as it is round here.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Mr & Mrs Kelley Hope (lpr1224)	We object on the following items:  Settlement Boundary	As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process.

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	<p>Thattham Settlement Boundary follows Floral Way from the A4 north towards Lawrence Lane. Land to the north-east of Floral Way is currently located outside of the Settlement Boundary. West Berkshire Local Plan Review to 2036 – Regulation 18 Consultation, Policy 2, C1 Location of New Housing in the Countryside states, “a presumption in favour of development and redevelopment within settlement boundaries and a presumption against new development outside of settlement boundaries”.</p> <p>The LPA’s current Housing Site Allocations – Newbury and Thattham Spatial Area, Table 2, Site Options Considered and Rejected; THA007 Land at Harts Hill states that the site was rejected based on “rural character, site separated from built form by Floral Way, potential for flooding, high archaeological potential” and “overhead power lines”.</p> <p>As stated in Thattham Strategic Growth document instructed by the Local Authority provided by David Lock Associates, “Thattham’s historical development is affected by the surrounding relief. Apart from a small amount of development towards Henwick Park and Cold Ash, the town has remained in the valley bottom... The only submitted sites affected by relief constraints are located to the north of the town, particularly those to the north-east of Thattham”. Due to the site’s topography, any proposed development will appear overbearing to existing properties along Farmhouse Mews in both scale, mass, and bulk. Any development sited on higher ground would have direct views into existing properties.</p> <p>The Strategic Growth document further mentions that the, “land at Harts Hill Farm... are closer to the AONB boundary and higher on the slopes above Thattham, and are more constrained for development in terms of topography, landscape sensitivity and ecology.”</p> <p>Thattham’s Strategic Growth Study by David Lock Associates and Stantec for West Berkshire Council states that THA10 Land at Siege Cross Farm has previously received 2 major planning applications that were both, “refused ultimately for being outside of Local Plan, and being beyond the edge of existing settlement boundaries”. Both applications were further refused by the Secretary of State.</p> <p>Local Plan Review 2020-2037: Emerging Draft states that;</p>	<p>North East Thattham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thattham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thattham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thattham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site</p>

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	<p>- Policy SP 1 “Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements.”</p> <p>- Policy SP 1 “The villages in the surrounding area will retain their existing role and separate identity, with settlement boundaries and Policies SP8 and DC1 ensuring that physical separation is maintained.”</p> <p>- 5.36 “The separate and distinctive identity of these individual settlements helps to define communities and is an important feature of the local character of West Berkshire... Much of the pressure for development is around the edges of settlements, which can physically lead to coalescence or introduce an increase in activity which has an urbanising effect. Despite this, a key feature of even the larger settlements is the way in which few have coalesced in recent times and so the blurring of physical distinction between places has largely been avoided. The retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character.”</p> <p>We therefore believe that Harts Hill Farm is of poor siting with regard to any proposed development, causing detrimental impact on both the historical importance of woodland, Bucklebury Plateau and AONB, alongside the segregation from Thatcham’s built form. We also believe that any development to the north-east of Thatcham will contradict the outlined policy noted above regarding separation between individual settlements, as any development will adversely amalgamate Thatcham, Bucklebury and Cold Ash. Were the LPA to amend the Settlement Boundary to include the development areas, this amendment would solely be to facilitate the proposed development, undermining the intrinsic values outlined within the LPA’s own policy.</p> <p>Countryside, Greenfield and Brownfield Sites Required under The Town and Country Planning (Brownfield Land Register) Regulations 2017, publicly available data provided by West Berkshire Council states that, when published, there were 54 brownfield sites within the district with a minimum net dwelling total of 2,841 houses across a total of 46.77 hectares. Further, as published by MHCLG on 11th November 2020, West Berkshire currently have 470 long-term empty homes, a 103% rise from 2019.</p>	<p>does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p>

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	<p>Thattham’s Strategic Growth Study for West Berkshire Council states that, “Thattham’s attractiveness as a place to live is strongly rooted in its high quality surrounding countryside”. It goes on to state, “it is important to note that Thattham has few examples of hillside development and so extending the urban grain and pattern of the immediate surroundings is unlikely to achieve a positive result”.</p> <p>Based on the previously referenced West Berkshire Local Plan Review to 2036 – Regulation 18 Consultation, Policy 2, C1 Location of New Housing in the Countryside where it states the LPA are in favour of redevelopment within settlement boundaries, alongside the brownfield and empty homes data noted above, there is insufficient reasoning to propose and accept new development at Harts Hill Farm due to the site being located within open countryside, outside of Settlement Boundary, and where the Local Authority’s existing empty and brownfield stock is in excess of the number of units proposed at Thattham. Far more appropriate sites are therefore available for redevelopment.</p> <p>Thattham Strategic Growth Study Stage 3 Report, Figure 50, Masterplan Concept also fails to depict the location of an existing Public Right of Way, walked frequently by Thattham residents. Although a footpath may be redirected under a Public Path Diversion Order governed by requirements set out in Section 119 of the Highways Act 1980, it is believed that any built form or diversion of this public footpath would be detrimental to public enjoyment, distance and views.</p> <p><b>Flooding</b> Tributaries to the River Kennet, flowing south through Thattham, have historically increased surface water run-off to a point of excess, causing the river banks to burst, flooding extensive areas of residential and agricultural land to both the north and south of the river. The Risk of Flooding from Surface Water map B2 drafted from 2018 data, denotes localised 1 in 30 year flooding along all tributary streams, especially those located to the west of Farmhouse Mews and The Spinney. Although measures have been implemented by means of the Flood Prevention Scheme to prevent future flooding to Dunston Park, existing agricultural land between Floral Way and Park Farm are periodically water-logged. Where partial percolation of</p>	<p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thattham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>



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	<p>surface water delays the immediate impact on local waterways and managed drainage systems, through an extensive increase in hardstanding generated by any new development, the discharge of Surface Water will only increase in both speed and thus volume, putting the properties along the northern boundary of Floral Way at severe risk of flooding. Flood History data also notes that 1,107 properties within the Thatcham area had internal flooding, source of which was surface water. The properties along Farmhouse Mews that border the fields to the north were also constructed with land drains along the boundary line to try and prevent run-off from the fields entering the curtilage. However, gardens frequently become sodden with garden retaining walls showing signs of significant water retention. Again, this issue will only be exacerbated by an increase in hardstanding increasing the flow of surface water down the slope towards Farmhouse Mews.</p> <p>Transport The A4 is a major road connection between Reading and Newbury, with connections to the M4 at J12 and J13 respectively. Thatcham Strategic Growth Study, Stage 1 Report, Table 8 states 79% of people travelling from Thatcham and 70% travelling to Thatcham use a car, with large delivery lorries frequently travelling to and from Harrods and Forterra depots within the Colthrop Industrial Estate. This, in addition to through traffic means that the A4 is an extremely busy highway. West Berkshire Council's Local Plan Review Transport Assessment Report Phase 1, Table 5.3 outlines traffic forecasts and scenarios for the junctions close to the new development. Assuming that the data was obtained around the time that the report was dated and thus during the COVID pandemic, the information disclosed is a misrepresentation of reality. The forecast and scenario table within the Transport Assessment provides a disingenuous representation of pre-COVID congestion issues in addition to the table being void of east bound data at Bath Road – Piper's Way and Bath Road – Floral Way. During peak times pre-COVID, vehicles along Floral Way attempting to travel east bound on the A4 always experience delays far greater than 50+ seconds, with instances of congestion, not caused by accidents, exceeding 15-minute</p>	<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their</p>

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	<p>delays and traffic backing up to Harts Hill Road roundabout. As the proposed development outlines the construction of 3no. new schools, road congestion between the core hours of 7-9am and 4-6pm will greatly increase. Thatcham Strategic Growth Study, Highway Strategy notes that traffic will be directed towards the A4, relieving the 'rat run' of traffic through Cold Ash and Bucklebury. However, historically during high congestion, Harts Hill Road becomes the main thoroughfare for many vehicles avoiding the A4 traffic. Statista Data 2017/18 states that on average there are 1.4 cars per household, therefore a development of 2,500 households will provide an increase of 3,500 cars on an already overloaded local road network. Where West Berkshire's Parking Standards are adhered to, any development with all parking spaces occupied would be greatly over the estimated figure of 3,500 cars noted above. Thatcham Strategic Growth Study also indicates that, "walking, cycling and public transport must become the natural choices for getting around", though this contradicts Stage 1 Report Table 8, noted above; reports also show that car usage has increased within West Berkshire therefore the statement is not accurate. Noted within West Berkshire Council's Local Plan Review 2020-2037, Item 4.8 "both towns have significant employment provision and Newbury provides many of the major services, including retail and leisure facilities. There is significant movement between the two towns and transport linkages, by rail and road are vital." This further contradicts the Strategic Growth Study. Additionally, although the Colthrop Industrial Estate will be within walking distance of any proposed development, the 'thriving' estate is not the sole source of employment with the majority of any new development commuting to a place of work, typically and as stated in the Strategic Growth Study, by car. The Thatcham train line is a major connection between Newbury and Reading, towards the southwest and London respectively. The line is also frequently used for freight trains, and with only a level crossing this is already a major cause for congestion throughout the day. There is no plausible location to introduce a bridge at Thatcham station therefore an excessive increase in vehicles will only further antagonise this issue. The proposal also identifies a new bus route to run immediately behind the properties of Farmhouse Mews. The gardens of Farmhouse Mews were designed and covenanted to be a sympathetic transition between residential</p>	<p>own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p>

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	<p>built form and agricultural land beyond, as such all the properties only benefit from post and rail low level fences. Were a new road and bus route proposed, all privacy and security to the garden and rear facing rooms would be significantly compromised.</p> <p>“Fulfilling Community Objectives” The Thatcham Strategic Growth Study Phase 3 report by David Lock Associates states within its Summary of Findings, that a concept masterplan for developing north-east Thatcham has been developed building on principles established at a community representatives’ workshop. Unsure of who these representatives are and what their links are to the area, it is hard to believe such a largescale development is fulfilling community objectives. The Thatcham Town Council Liberal Democrat representative, Cllr David Lister, is strongly against the development from happening, residents who would be directly affected by the development alongside many within the Thatcham community are also strongly against the development, with a petition started to voice their objections. The development’s consultation period was launched just before Christmas but was not widely advertised, therefore many residents were unaware of the consultation or the development itself taking place. With such a short time frame to respond, it allows little time to review the documentation drafted and respond with any objections prior to the consultation deadline. Thatcham community have not been given adequate time to respond to the proposal and object accordingly, therefore it is imagined that any response received will not give a true representation of the thoughts of the residents.</p> <p>Size, Density and Tenure Stated within the Local Plan Review 2020 -2037: Emerging Draft, “residential development will contribute to the delivery of an appropriate mix of dwelling tenures, types and sizes to meet the existing and future housing needs”. Also stated within the Emerging Draft under Housing type and mix, Item 6.50, Table 3, the size in highest demand for market value properties is 3-bedroom at 40-45%, with affordable housing being 2-bedroom properties at</p>	

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	<p>35-40%. The emerging plan also mentions that there should be a broad mix of future dwelling sizes for both market and affordable housing, however this appears to be seldom the case with recent developments within the local area. Reed Gardens in Woolhampton for example appears to have delivered 14 affordable houses, though only 2 of those properties being 2-bedroom, the highest in demand, with the remainder being 3 and 4-bedroom properties. Additionally, recent developments within Settlement Boundary could have increased density without negative impact on the development or surrounding context. As such, had recent developments delivered properties of a size to meet those highest in demand, and/or provided a density of scheme appropriate for its location within Settlement Boundary, the requirement for new housing may be fewer than the 2,500 proposed. The 2011 ONS Census states that there were 10,241 dwellings in Thatcham. The number of new units proposed at the north-east Thatcham development would mean an increase to Thatcham of nearly 25%, an excessive number that neither the infrastructure or surrounding landscape would cope with. Tull Way for example consists of only 75 properties however exceptionally low density when compared to the site's area.</p> <p>We, along with many other residents of Thatcham object to the extent of the north east Thatcham Development, specifically to those affecting the Harts Hill Road and Harts Hill Farm area. We hope that you will reconsider the proposed Housing Site Allocations and look to locating the houses required in a more appropriate, brownfield or within Settlement Boundary area, not within open countryside.</p>	
Christel Caderius van Veen (lpr966)	<p>I am writing to express my opposition to the plans to build 2500 houses in the floral way/crematorium area of Thatcham.</p> <p>Given the enormous levels of rainfall we have each year, which is increasing annually, it is irresponsible to consider developing more of the green belt land which helps to absorb this and prevent flooding, whilst there are areas which are already no longer green, and have space for housing and better infrastructure. There will be many such sites, especially given the changes Covid 19 will make to working practices. I implore you to consider alternative non green belt sites. It may be that several smaller housing developments</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>

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	<p>arise instead of one huge one but isn't that more natural anyway - it will allow people to slot into existing services much easier.</p> <p>Please do not allow such a wide scale destruction of yet more of our countryside. It's not just there to be decorative, it's serves a very useful purpose, and unless you heed warnings, you won't notice until it's gone and the town floods....</p>	<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Daniel Musker (lpr969)	<p>Re: Objection to the proposed NE Thatcham housing development (Local Plan Review 2020-2037 Emerging Draft)</p> <p>As a West Berkshire Council resident and Bucklebury Parish Council (BPC) parishioner, I feel that I have been given very little notice about this significant proposed development in NE Thatcham. It was by chance that I stumbled across the plans on social media after the festive period. I am disappointed that neither WBC nor BPC have been more proactive in notifying local residents about such an important matter, and to allow for a full and timely consultation process.</p> <p>Having reviewed the publicly available information and plans for the development, as well as attending the BPC briefing from David Southgate via Zoom on 15th January 2021, I would like to outline the reasons for my objection to the proposed development below.</p> <p>Negative impact to the surrounding area</p> <ul style="list-style-type: none"> <li>• The scale of this proposed development of 2,500 homes is unacceptably high for a town the size of Thatcham and its surrounding area</li> <li>• It will negatively impact the character of rural communities in West Berkshire</li> <li>• Adversely affect the prominence of the surrounding landscape and countryside</li> </ul>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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	<ul style="list-style-type: none"> <li>• The boundary between the village of Upper Bucklebury and the proposed NE Thatcham development will become undefined. <ul style="list-style-type: none"> <li>○ Floral Way is a clear boundary for the town of Thatcham.</li> <li>○ Breaking this boundary will negatively impact the setting of the AONB to the North.</li> <li>○ This would result in sprawl leading up to the AONB boundary, rather than the demarcated zone of agricultural land.</li> </ul> </li> <li>• Should the proposed development go ahead, there is no clear boundary that would restrict future development of the site.</li> </ul> <p>Increased traffic</p> <ul style="list-style-type: none"> <li>• There will be a significant increase in traffic leading up Harts Hill Road <ul style="list-style-type: none"> <li>○ Harts Hill Road will be used as a rat-run to the M4 and A34 from the proposed development</li> <li>○ Harts Hill Road, along with Broad Lane in Upper Bucklebury, already suffer with high levels of speeding cars (as reported by recent BPC SID survey).</li> </ul> </li> <li>• The villages of Upper Bucklebury, Chapel Row and Bradfield Southend will be negatively impacted by this increase in traffic, in terms of quality of life and the safety of residents <ul style="list-style-type: none"> <li>○ There are limited pavements for pedestrians in many of the villages</li> <li>○ Families walk along Broad Lane, in Upper Bucklebury, to get to amenities and for recreation</li> <li>○ The increased level of traffic will be dangerous for children who walk along Broad Lane to get to the village school</li> </ul> </li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>• Thatcham railway station</li> </ul>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and</p>

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	<ul style="list-style-type: none"> <li>○ The plan does not address the problem of the Thatcham Railway crossing, which will be significantly impacted by traffic, along with the associated environmental with increased emissions.</li> <li>○ There is no provision for extending the car park at the station for those who commute to work by train.</li> <li>● Thatcham town centre <ul style="list-style-type: none"> <li>○ There is no investment in infrastructure to Thatcham town centre to improve its facilities and amenities.</li> <li>○ Failure to invest will result in those new households driving into Newbury or other surrounding areas.</li> </ul> </li> <li>● Healthcare facilities <ul style="list-style-type: none"> <li>○ There is no provision for the increase in demand to healthcare services and GP practices in the area.</li> <li>○ These are already placed under strain and will need to accommodate a further 2,500 households.</li> </ul> </li> <li>● Development Strategy <ul style="list-style-type: none"> <li>○ The Local Housing Need (LHN) for West Berkshire is 513 dwellings per annum</li> <li>○ The Local Housing Need Methodology and Household Projections in England (Office for National Statistics) are based on statistical modelling and do not take into account the amount of available developable land within each local authority.</li> <li>○ 85% of the land within WBC is excluded from development potential (AONB and flood plains).</li> <li>○ I believe that the figure of 513 dwellings per annum is disproportionate to the amount of available developable land in West Berkshire.</li> </ul> </li> </ul> <p>Whilst I recognise that there is a need to provide future housing, I feel that the scale of this proposed development is out of proportion to what the local area can accommodate, for the reasons outlined above.</p>	<p>adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>Should this proposal be revised, I would like to request that WBC Planning considers the following:</p> <ol style="list-style-type: none"> <li>1. Reducing the size of the proposed development significantly and keeping the housing stock close to the Floral Way boundary to limit impact on the surrounding AONB.</li> <li>2. Put measures in place to limit any additional traffic using Harts Hill Road. This could be achieved by cutting off link roads from Harts Hill Road to the proposed site.</li> <li>3. Plans to limit traffic through the surrounding villages</li> <li>4. A clear boundary that defines the entirety of the proposed development to prevent future sprawl.</li> <li>5. Investment in infrastructure at Thatcham Station (as outlined above) and in the town centre to improve amenities</li> <li>6. Consideration for the quality of life of local residents during the proposed building works, in terms of noise and disruption along roads. Also, consideration to limiting the duration of the works such that no single area is subjected to years of building works disruption (half of homes by 2037).</li> </ol>	
Joanna Cooke (lpr1001)	<ul style="list-style-type: none"> <li>• The proposal does not contain the provision of healthcare or medical facilities for these 2500 homes.</li> <li>• The proposal does not address the question of how Thatcham train station will cope with increased demand. <ul style="list-style-type: none"> <li>- Parking facilities in particular are inadequate for even current demand, and so there would need to be a significant increase in this, to cope with increased demand.</li> <li>- The level crossing at Thatcham station frequently has extremely long queues of traffic waiting to cross the train line. The proposal does not address how the increase in queues of traffic in this area will be managed.</li> </ul> </li> <li>• As well as the road at the Thatcham level crossing being insufficient to cope with increased demand, there are other areas near the proposed development which are also not adequate for increased local traffic. <ul style="list-style-type: none"> <li>- Increased traffic will have a significant negative effect on many of the surrounding villages including Upper Bucklebury, Chapel Row,</li> </ul> </li> </ul>	<p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>



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	<p>Cold Ash and Bradfield. These roads already suffer with many incidents of speeding, as confirmed by Bucklebury Parish Council SIPS.</p> <ul style="list-style-type: none"> <li>- Increased traffic will be a safety concern for many residents, particularly the elderly and those with young children.</li> <li>- A number of the roads in these areas do not have a footpath. For example, The Ridge in Cold Ash, Burdens Heath in Upper Bucklebury and Harts Hill Road leading to Upper Bucklebury. Increased traffic will make these roads significantly more dangerous for pedestrians and the people who already live there.</li> <li>- Increased traffic will mean increased noise and disturbance, affecting the quality of life for the village residents.</li> </ul> <ul style="list-style-type: none"> <li>• The proposed development is extremely close to the North Wessex Downs AONB and will therefore negatively affect this area. The proposed development will mean a loss of the open aspect of the area, and loss of existing countryside views particularly for those residences on the lower half of Harts Hill Road.</li> <li>• The North Wessex Downs AONB already suffers with: <ul style="list-style-type: none"> <li>- issues regarding the dumping of waste and fly tipping, which will only be made worse by the close proximity of such a large development.</li> <li>- illegal use of motorised vehicles, which will also be exacerbated by the development.</li> </ul> </li> <li>• A development of this size will also have a significant detrimental impact on the local wildlife.</li> </ul>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that</p>

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		<p>whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Hayley and Martin Dunstan (lpr1005)	I would like to register my objection to the proposed development of 2,500 homes on the farmland between Bucklebury, the A4 and Floral Way.	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)

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	<p>The impact on Bucklebury in terms of traffic through our rural roads and lanes, damage to the environment, pollution, over development of Thatcham and its consequential reduction of the greenbelt, is extremely concerning.</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
M C Smyth (lpr1007)	<p>We write to object to the proposed N E Thatcham Development of 2500 homes in the local plan review.</p> <p>The main reasons are:</p> <ul style="list-style-type: none"> <li>Over development of the site</li> <li>Closing of the strategic gap between Thatcham and Upper Bucklebury</li> <li>Increase of traffic with all its problems including infrastructure</li> </ul>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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	Inadequate local facilities to support a development of this size	<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>

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		<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Audrey Jackson (lpr1010)	<p>After careful consideration, I would like to object against the proposed building of 2500 houses to the north east of Thatcham. Currently Thatcham has around 11,000 houses so to increase this by 25% on one site is far too big for Thatcham, given the limitations to the local road infrastructure.</p> <p>Prior to these series of Lockdowns, morning traffic is frequently queued back to the Mill House with traffic trying to get on the A4 at the junction with Floral Way. At the other end of the North Thatcham relief road, traffic is frequently queued back trying to get onto the A4 by the garden centre/Turnpike Road junction. Of an evening, traffic is queued back along the A4 beyond the Coach and Horses pub to get back into Thatcham.</p> <p>The A4 through Thatcham has been widened as much as it possible can. When the M4 is closed, due to an accident/roadworks, traffic is often diverted down the A34 to Newbury, and along the A4 to rejoin M4 at Theale. Roads are gridlocked during the day taking an hour to complete what should be a 5 minute journey.</p> <p>The road through Upper Bucklebury, along Burdens Heath to The Ridge in Cold Ash are already regularly used as a cut through/ Rat Run. Burdens Heath is a dangerous road, with drivers frequently exceeding the 30mph speed limit (often 50+) There are ditches on either side of this road, and in</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just</p>

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	<p>bad weather can be full of water, often spilling out onto the road, making it difficult to see the edge of the ditch and the potholes. Add in that there is only one working street light along this road and a significant number of the reflective black &amp; white posts are sliding into the ditches or hit by traffic.</p> <p>Parents with young children in pushchairs, often put theirs and their childrens lives at risk when walking their children to school, as they have to walk along the road. No footpath paths. Over the last couple of years, we have seen more of the larger tractors using this road and they certainly do not take any notice of speed restrictions.</p> <p>Without question, number of houses proposed to be built in Thatcham at this one site, will certainly increase, with many drivers coming through Bucklebury and down Harts Hill. This road already presents dangers with buses and trucks trying to pass each other, especially if it on a bend.</p> <p>Currently the fields between Bucklebury and the A4, soak away a significant amount of rainfall (indeed it was this that caused the flooding in Thatcham in 2007)</p> <p>Children from the NEW housing, some of them may come to Bucklebury School, which would then add more cars being on Harts Hill, and parent parking in Blacklands Road/Berries Road could cause major problems with residents living in this area.</p> <p>As seen with other developments in Thatcham (such as Kennet Heath), I am really concerned that a development that starts off at 2,500 houses will end up being nearer 4,000 houses. With Kennet Heath, the initial plans were for 500 houses but the developers insisted that they could not complete all the infrastructure required by the council as part of the plans (i.e. pedestrian bridge over the railway) unless they could increase the number of houses built. The estate was not built to ensure that at least 2 cars per household could park off road and the majority of cars park on the road and part on the pavements. Indeed there is no dedicated parking for those living in flats. What should have been a 3 bedroom detached house with a good size</p>	<p>changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>garden is now 2 x 3 bed semi on the same plot with a tiny postage stamp of a garden.</p> <p>It's all very well saying that additional facilities (shops, doctors surgeries etc) will be built but what guarantee is there that they will actually be built. The Dunstan Park estate had provision for a new Primary School. However, it was decided that it wasn't needed and ended up with houses being built on that site instead (the area that is now Rosemary Gardens). Six years after this decision was made, there was not enough Primary school places in Thatcham for all the children living in Thatcham (2010 intake).</p> <p>Thatcham Railway Station is one of the busiest stations in Berkshire and will only get worse with additional houses. Prior to lockdown, there was insufficient parking at the station and buses are infrequent. Anyone living in Bucklebury has to drive to the Station – they do not have the option as Thatcham residents do to walk to the station. Bus services in the village are infrequent and does not stop at the Station. Unless you are parked at the station before 7am, there is not usually any space left.</p> <p>A vehicular bridge over the railway is needed, but this needs to be sited away from the current crossing and moved further east to ease the traffic in Thatcham. Even in lockdown, the queues for this crossing extend a long way down Pipers Way and Station Road (beyond the entrance to Kennet Heath) bringing this area of Thatcham to a halt when the barriers are down.</p>	
Jon Willis (lpr1013)	<p>It is very encouraging to see that this proposal is being considered as a single entity although being supported by four different developers. This is vital to ensure that the area is planned as a whole along consistent themes and that the necessary infrastructure is provided. This is unlikely to be the case if separate developers were allowed to operate independently and it is consequently very important that this joint approach is maintained. In my opinion the planning consultants have produced an excellent comprehensive analysis and report for the area, placing particular importance on environmental issues, with emphasis on water and green space management.</p>	Comments noted and suggestions welcomed.

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	<p>A particular theme of the plans is to encourage 'active travel'. This is to be strongly welcomed and much more likely to be achieved if the area is planned as a whole. Pedestrian and cycle routes must be designed to the highest quality in terms of safety and attractiveness and wherever possible key routes must be more convenient and wherever possible quicker to use than taking the car. The relationship between the layout of roads versus the layout of cycle and walking routes to and from homes is so important in this respect.</p> <p>The Transport Planning consultants have undertaken a standard methodology assessing the impact on movement and traffic using data from a number of sources. They estimate the plans will generate around 2900 internal trips and 2500 external trips in the AM peak. Using modal share information from the adjacent area of Thatcham they find 80.8% of external trips are made by mechanised modes, 10.6% by cycle or on foot and 8.3% by public transport. Trip distribution shows a predominant east west movement with only 10% of trips to the north and 5% to the south.</p> <p>The consultants have then made heroic assumptions about future travel patterns. Lockdown and the other restrictions have had a major impact on travel in the UK with the Government encouragement of home working. A pre Covid study for the DfT suggested that about 10% of the workforce would use some form of tele-working in the future but that this would have little impact on travel. However both individuals and companies now have experienced the costs (worsening personal social wellbeing) and the benefits (reduced travel time and cost for the individual, reduced office space requirement for companies) which is bound to have a permanent impact, but impossible to assess at this time. The consultants have assumed a very conservative 2.2% change in trips as result of home working. The change will depend to a large extent on the job profiles of the inhabitants and I would suggest that a higher figure of say 10% is not out of the question.</p> <p>The consultants have also made an estimate for the likely impact of the design emphasis on 'active travel' with strong encouragement for walking and cycling. It is hoped this will lead to a figure of close to 100% for all trips within the area. For trips out of the area they assume a fall of 20% in the proportion of car trips in comparison with the neighbouring area of</p>	



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	<p>Thattham. The estimates then give 66.7% using motorised modes, 16.6% by cycle and on foot (a 57% increase) and 14.2% by public transport (a 71% increase). To achieve these changes will require significant investment in services and facilities.</p> <p>Local destinations within walking/easy cycle times are Thattham town centre, Thattham station and the West Berkshire Hospital. These are the routes where of-site investment is required to make them attractive and safe. The consultants have identified a number of measures to improve road crossings and cycle ways. I would argue that the scope of these is inadequate to achieve a fundamental change in safety and quality. A much more imaginative approach is needed to make use of these routes the norm in the future.</p> <p>A 71% increase in public transport will also be difficult to achieve without investment. The consultants suggest a circular small bus service to link the town centre and the station could be introduced. This is to be welcomed but as they point out such a service will need financial start up support if the increase in public transport is to be achieved. The strong east-west movement from the site can be supported by the No.1 bus route. But this will need to be diverted closer to or within the site and quality waiting areas provided. These are best placed within the local centres.</p> <p>The work suggests only 10% of journeys will be made to the north through the AONB area and that these routes will be restricted in some form to discourage traffic. It is not clear what is envisaged but traffic calming measures similar to those in Upper Bucklebury in Chapel Row and Southend Bradfield should be considered.</p> <p>In summary the overall approach to the development proposal is to be welcomed. However to achieve the desired impacts the following are deemed essential:</p> <p>The area must continue to be planned as a single entity and the design principles strongly maintained. The area must not be allowed to be developed piece meal by individual developers.</p> <p>The emphasis on 'active travel' with high quality and safe routes within and leading to and from the area should be at the forefront of the detail design of the homes, local facilities and road layouts.</p>	

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	<p>Significant improvements to off-site pedestrian and cycle routes and secure cycle facilities at places such as the town centre and station will be required. Further work will be necessary on the appropriate bus routes and facilities and funding.</p> <p>Further understanding of the measures to minimise traffic impacts on the villages to the north is required.</p> <p>Changes:</p> <p>In summary the overall approach to the development proposal is to be welcomed. However to achieve the desired impacts the following are deemed essential:</p> <ul style="list-style-type: none"> <li>• The area must continue to be planned as a single entity and the design principles strongly maintained. The area must not be allowed to be developed piece meal by individual developers.</li> <li>• The emphasis on ‘active travel’ with high quality and safe routes within and leading to and from the area should be at the forefront of the detail design of the homes, local facilities and road layouts.</li> <li>• Significant improvements to off-site pedestrian and cycle routes and secure cycle facilities at places such as the town centre and station will be required.</li> <li>• Further work will be necessary on the appropriate bus routes and facilities and funding.</li> <li>• Further understanding of the measures to minimise traffic impacts on the villages to the north is required.</li> </ul>	
Debbie Wood (lpr1015)	<p>I have concerns on the impact of new housing being built will put pressure on the local schools and health services, already, and you are building more. Are there extra schools and hospitals being built to accommodate this extra population.</p> <p>The surrounding area is being built on, most villages are now becoming not small villages but large towns with further problems for the roads and people who already live there. On top of that, towns being merged to create larger towns.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>At my local school there are problems of a quiet estate turning busy with lock down restrictions, creating lines of parents and children leaning on residents walls and rails. Having coffee meetings outside our houses long after school has started. With them blocking the residents' drives when driving and dropping off.</p> <p>I have two elderly residents who have lived there before school was built, and now not only is it weekdays, we have the traffic but weekends too, with football and slimmer world.</p> <p>Maybe you should look at turning warehouses not in use into places to live with schools and hospitals, not build further on land which is not only beautiful to look at but create a haven for wild life which needs it.</p> <p>As humans we don't think of the wild life that we need to keep for the future generations but what we need instead.</p> <p>These objections are very valid, you don't live nearby and for all of the local old and young residents. I feel you need to address certain issues.</p> <p>The other impact you have is the pollution you are creating for the poor wildlife. With older residents who have lived there for 50 to 60 years.</p> <p>I feel you need another way to create life not line pockets of land owners trying to sell land. I am looking forward to your input, on the above.</p>	<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
James Plusnet (lpr1016)	<p>What provision is being made for healthcare provision to support this new community? They are already overstretched. I see nothing in the plan and maps.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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Paul Weston (lpr1018)	<p>I wish to provide my opinion and confirm my objection to the enormous development proposed for North Thatcham.</p> <p>I object on several Grounds as follows:-</p> <p>Environment</p> <ul style="list-style-type: none"> <li>• The development would harm the environment surrounding Bucklebury</li> <li>• The development would cause a dramatic reduction in the visual and physical separation of North Thatcham and Bucklebury Village, with the reduction and even the loss of a rural gateway to Bucklebury.</li> <li>• The rural views from Floral Way, A4 and other areas of North Thatcham which are, much valued by the resident, will be removed</li> <li>• The development will be highly visually intrusive from many vantage points looking south</li> <li>• The development will destroy area of tranquillity and agricultural land between North Thatcham and Bucklebury.</li> <li>• I fear that the Bucklebury primary school will become surplus to requirements if they build a new primary school on this development and the Bucklebury primary school will close and be developed.</li> </ul> <p>Traffic</p> <ul style="list-style-type: none"> <li>• There will be a huge increase in the traffic flow through our village especially at peak times</li> <li>• There will be increased traffic flow on to Floral Way, and will affect the access onto the A4</li> <li>• There will be strain on the local infrastructure</li> <li>• There will be an increase in traffic into the village and to Bucklebury primary school as many North Thatcham residents send their children to the school</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>• There is a proven flood risk to residents south of the application site despite the flood alleviation measure already installed.</li> </ul> <p>Sustainability</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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	<ul style="list-style-type: none"> <li>• Car dependency is likely to be very high at this location, and therefore this site fails on the sustainability criteria.</li> <li>• There are very few employers close to the site leading to the obvious increase in car usage.</li> <li>• Secondary Schools are not within walking distance.</li> <li>• Walking distance to significant services too great.</li> <li>• Public transport remains non-viable option due to limited timetable and frequency</li> </ul> <p>Alternative sites within West Berkshire</p> <ul style="list-style-type: none"> <li>• Over Development in one area is lazy planning policy and such places all the burden and the need for resources in one place and also they will become over stretched.</li> <li>• I believe that there are other more suitable sites that are already available within West Berkshire, and this is just to name a few             <ul style="list-style-type: none"> <li>○ Land at the junction of Turnpike Road and Benham Hill next to the community hospital</li> <li>○ Land around Henwick Farm off Turnpike Road</li> <li>○ Land in Theale off the high street Hoad way and M4,</li> <li>○ Theale - Lakeside, The Green</li> <li>○ Tilehurst - Land off Pincents Lane formally the golf course</li> </ul> </li> </ul>	<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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		The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.
Richard and Jennifer Ainsworth (lpr1028)	<p><b>GROUND.</b> The proposals will have a severe adverse impact on the Communities and Environment within the Bucklebury parish.</p> <p><u>Traffic</u> The parish suffers from ever increasing traffic using Harts Hill though to Bradfield as an East - West rat run. There are no speed limits on most of these rural roads affected by the proposals which are already affected by speeding vehicles and subject to accidents in recent years. The scale of the development, with its schools, sports facilities and services will over time overwhelm the roads which are important as part of the rural environment.</p> <p><u>Heritage/Environment</u> The natural heritage will be blighted considering its impact on the legally protected AONB. Although the proposed sites are not within the North Wessex AOB the N.E. access roads run through Bucklebury parish and thus the AONB is adversely affected. The County Park element does not compensate for a complete change of landscape and character which exists at present e.g., open fields and agricultural land.</p> <p>With the development butting up to Long Grove the biodiversity of Bucklebury Common will be threatened. At present it is home to and is an important site for a variety of wildlife, including Night jars, Adders and Slowworms.</p> <p><u>Proximity to AWE Aldermaston</u> The designated zone is within AWE 8 km OCZ. This is set for a purpose and WBC should not be submitting such a large development for consideration.</p>	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.

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	<p><u>Need for Development WBC 4.27</u>            Apart from a requirement to find development sites how and why does Thatcham need this development when the roads are already congested at peak times and a 25/40-minute wait at the Railway Crossing is not uncommon.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Roger and Shirley Aylward (lpr1031)	We strongly object to the proposed development for many reasons. Firstly, this will lead to serious over development, loss of valuable rural countryside,	Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing

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	<p>loss of Thatcham Green belt and have a massive impact on on local traffic not least on the roads across Bucklebury Common which will be used by multiple vehicles coming to and from the motorway at Chieveley as well as to and from Theale. With the Government saying they are serious about decreasing pollution, this would be a serious move in the wrong direction. We all accept that houses need to be built but not on this scale in one place.</p>	<p>requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>



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		<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Gill Beale (lpr1036)	<p>I wish to register my objection to the building of new houses between Upper Bucklebury &amp; the A4 &amp; Floral Way. This would result in over development of rural countryside &amp; the green belt. The traffic &amp; pollution would be a real problem &amp; the provision of schools, medical facilities, sewage, water, transport &amp; recreational facilities, to name but a few of the considerations for such a large number of houses.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just</p>

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		changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Lyn Bliss (lpr1037)	<p>I wish to register my dismay at the proposed plan to build 2500 houses between Upper Bucklebury and the A4 and Floral Way. Those of us who live in Upper Bucklebury have chosen to live in a rural setting and do not wish to become a 'suburb' of Thatcham. In addition to that, I don't feel that the infrastructure of Thatcham could in any way support a development on such a scale. Schools in this area are already over-subscribed and facilities such as doctor's surgeries are stretched to the limit. Traffic, already a problem in Upper Bucklebury, would increase, and the resultant raised level of pollution be unacceptable. Thatcham has already had a very large increase in housing stock in the past two decades; enough is enough. Whilst I understand the need for housing, I feel that the proposed development is disproportionately large for the area and hope that the planning committee will refuse to permit it.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely</p>

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		infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Tim Auld (lpr1038)	<p>I'm writing to provide feedback for the NE Thatcham Development of 2500 homes you are proposing as part of the Local Plan Review 2020 -2037 Emerging Draft December 2020 document. After careful consideration I would like to object to this development proposal for a number of reasons.</p> <p><b>1. Inadequate Supporting Infrastructure for Scale of Development</b></p> <ul style="list-style-type: none"> <li>• The proposal doesn't contain details of an increase in healthcare services to support +25% housing in the Thatcham area.</li> <li>• The proposal doesn't address the strain of increased demand on Thatcham Train Station. Taking into account the fact that parking facilities at Thatcham Train Station are already insufficient to cope with current demand, there would need to be a significant increase in the provision of parking at the station to cope with increased demand.</li> <li>• The road infrastructure in a number of common commuting directions from the development are not sufficient. These include: <ul style="list-style-type: none"> <li>- Travelling north to the A34 in the Cold Ash direction.</li> <li>- Travelling east from the development through Upper Bucklebury, Chapel Row &amp; Bradfield (many choose to use this route instead of the A4).</li> <li>- Travelling south across the Rail Level Crossing.</li> </ul> </li> </ul> <p><b>2. Negative Impact on Surrounding Villages &amp; North Wessex Downs AONB</b></p> <ul style="list-style-type: none"> <li>• The location of the development straddling Harts Hill Road, which includes a roundabout, will lead to a significant increase in traffic using the Harts Hill Road route. My concerns include: <ul style="list-style-type: none"> <li>- This increased traffic will negatively impact many surrounding villages including Upper Bucklebury, Cold Ash, Burdens Heath, Chapel Row and Bradfield.</li> </ul> </li> </ul>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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	<ul style="list-style-type: none"> <li>- The current roads will not be sufficient to support this increased level of traffic.</li> <li>- These roads already suffer with concerning levels of speeding (recent Parish Council SIPS deployment has confirmed this and the police have the figures).</li> <li>- The increased traffic will be a safety concern for local residents, particularly children whilst walking to and from school.</li> <li>- The houses located on Harts Hill Road and Burdens Heath in Upper Bucklebury, and The Ridge in Cold Ash, do not have a footpath outside. Increased traffic along these roads will make it significantly more dangerous for pedestrians in these areas in particular.</li> <li>- The increased volume of traffic will impact the quality of life for the residents of the villages mentioned through increased traffic noise and disturbance.</li> <li>• The close proximity of the development to the North Wessex Downs AONB will put increased strain on this area: <ul style="list-style-type: none"> <li>- There is already significant waste issues, that would be a lot worse if not for the kind village volunteers who regularly undertake rubbish clearing days.</li> <li>- It would also experience an increase in 4 wheeled vehicles being used illegally in the woodland that the Parish work hard to limit/prevent.</li> <li>- The development would have a detrimental impact on the wildlife that currently lives in and enjoys the area.</li> </ul> </li> <li>• It will lead to a loss of the open aspect of the local neighbourhood and loss of existing countryside/rural views from a number of existing properties. This will specifically impact those properties along the lower Harts Hill Road region.</li> </ul> <p>Changes: I do understand that West Berkshire has a requirement to provide additional housing in coming years. However, I object to the scale of this development in this single location, for the points I mention above. If development of the proposed site is essential, I request the following be carefully considered:</p>	<p>modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>

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	<ul style="list-style-type: none"> <li>• Significantly reduce the development from its current size of 2500 homes, to limit the impact on local residents by considering using additional sites across the West Berkshire area. We consider the proposal to be an unacceptably high density of homes.</li> <li>• Concentrate the development toward the southern Colthrop land. This would concentrate the development nearer to the A4 and limit the impacts I highlight to the surrounding villages and the AONB.</li> <li>• Ensure the development cannot be accessed from the Harts Hill Road.</li> <li>• In addition to the above, share plans that show how you will limit the flow of traffic through the surrounding villages including Upper Bucklebury, Cold Ash, Burdens Heath, Chapel Row and Bradfield.</li> <li>• Challenge the plans to concentrate the development in a band closer to Floral Way, in order to ensure that the development is as far away from the Wessex Down AONB as it can be.</li> <li>• Share plans to address the infrastructure challenges I highlight above including the train station facilities and the level crossing.</li> </ul>	
Jean & Neville Morris (lpr1041)	<p>We object to the development = pollution, loss of open space and the environment, population would be overwhelming for the area. Traffic would increase enormously, Harts Hill and the roads through the village would not be safe for all concerned.</p> <p>We want Bucklebury to stay as village, not to join the rat race of Thatcham.</p>	<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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		<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning</p>

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		and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Chris and Trevor Tomkins and Halsall (lpr1042)	<p>As residents in Beenham, my husband and I would like to voice our <b>strong objections</b> to the proposed development of 2500 houses on the A4. This represents excessive over development and is in effect a whole new town between Thatcham and Upper Bucklebury.</p> <p>This is over development of an area on what is already a very busy, <b>congested stretch of the A4</b> with an unacceptable <b>impact on the countryside, the environment</b> and the subsequent effect of <b>increased pollution on everyone's health</b>.</p> <p>Surely, by now we know and understand that it is not desirable to be decreasing our access to the countryside and negatively impacting on everyone's health with increased pollution? This is a very large development.</p> <p>Changes: Other sites <u>are</u> available and whilst smaller developments may be less financially attractive to the developers; smaller developments are much better for resident's wellbeing and the surrounding environment – both town and country.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
D.C. Holland (lpr1043)	Experience of being over 80 years old, 45 in building construction and large scale housing developments, and 40 years in Thatcham and around I have yet to see promises of suitable infrastructure for such developments ever coming to pass. The density of developments ever increases and garages are approved for habitable use reducing on site parking. Roads and paths reduce in width and parking on pavements increases impeding the use of	Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD

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	<p>wheelchairs. The increase in recycling results in numerous bins and little or no allowance for their tidy storage. This before we start to consider the pollution from possibly an additional 5k to 7k vehicles.</p> <p>Thatcham has seen tremendous housing development in these last 40 years and I suggest you drive round and see the problems of high density developments and lack of adequate infrastructure and amenities before adding to the existing problems.</p>	<p>site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Chris Read (lpr1049)	<p>I would like to have my views known and taken into account for the proposed 2,500 house development NE of Thatcham.</p> <p>I am sure that other people have raised their concerns about impact to traffic on Harts Hill and Upper Bucklebury as well as the impact to environment in the area (concerns of mine as well).</p> <p>We all remember the 2007 flooding that Thatcham suffered (my wife's Nissan Almera was completely swamped on the A12 coming out of Waitrose on that day). Any development on Harts Hill will only increase this flood risk as the only major waterway for runoff is the other side of Thatcham (water will pass through the developments already in North Thatcham, Thatcham Town Centre, more housing and business estate, Kennet school, business park, station and then reach the river Kennet.)</p> <p>Changes:</p> <p>I would like to raise that the government has previously indicated it would be willing to fund a bridge over Thatcham level crossing as long as there is a development South of the Junction. I am sure it would be willing to invest its much vaunted infrastructure building budget to support a significant link to Basingstoke and the south.</p> <p>Crookham Hill and Crookham Common is an ideal area for development for the following reasons:</p>	<p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>



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	<p>1. The inevitable impact to water runoff from Crookham Hill caused by any development can be easily be accommodate by:</p> <ul style="list-style-type: none"> <li>1.1 Kennet river</li> <li>1.2 natural drainage in the area and accommodating substrate</li> <li>1.3 rewilding of the area between Kennet River and Chamberhouse Mill Lane into marshes to slow and filter runoff</li> </ul> <p>There would therefore be the following assets created with such a development at Crookham Hill.</p> <ul style="list-style-type: none"> <li>1. Major access pinchpoint relieved at Thattham Level Crossing with a bridge funded by central government</li> <li>2. Sporting development at Crookham Athletics track</li> <li>3. Link to Thornford Park further development</li> <li>4. Opening up of further public access to Greenham Common and Brimpton Common</li> <li>5. Major rewilding benefitting around the river Kennet (south) not only benefitting wildlife but also easing flood relief for all downstream of Thattham</li> <li>6. No increase of flood risk to Thattham (no one will thank the council if, after another flood, their insurance premiums go up again).</li> <li>7. Suitable spaced development with plenty of accessible greenspace between new and existing conurbations (as opposed to Harts Hill Development which will be back to back with the other recent developments in North East Thattham).</li> </ul>	
Claire Kendall (lpr1045)	<p>I strongly object to the planning of 2500 houses being built between floral way and the crematorium in Thattham.</p> <p>We our a rural village it will cause more traffic ruin the green land and farms we can't cope with that many people in our small area, please think about the effect it will have on our villages.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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		<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Sue Morgan (lpr1046)	<p>I write to object, in the strongest terms, to the above proposed development of any new housing to be built on the rural lands between Upper Bucklebury and Thatcham. Here are my main reasons:</p> <p><b>1. Building on a Flood Plain</b> The proposed site is completely inappropriate being an area of outstanding natural beauty and an important flood plain. Building houses and roads will have an adverse effect on Thatcham with the particular issue of “run-off” of water from so many house and garage rooves. I clearly remember the catastrophic flooding of lower Thatcham and Woolhampton in 2007. Expected climate change will only exacerbate that risk.</p> <p><b>2. Long term impacts of the Coronavirus pandemic are still unknown.</b> The impact of the current Covid pandemic on housing requirements is not yet known. Our demographics and working patterns will have changed and this plan needs to be shelved until the long-term impacts of Covid upon the housing requirements are better understood.</p> <p><b>3. Negative change on the identity of Upper Bucklebury as a village community</b> Upper Bucklebury will be effectively joined to Thatcham and the A4 which</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>

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	<p>will remove the rural, village feel of our community forever. Not only is the development hypocritical to the previous planning applications here which have been rejected on the grounds of “not in keeping with rural surrounds”, the proposals are contradictory to our future vision in the “Parish Plan” document. I have volunteered for Neighbourhood Watch, Bucklebury Primary School Governor and I spearheaded the project to improve the Fred Dawson Playpark in this village for more years than I care to remember. I was here when WBC needed a free Covid Helpline Service set up and co-ordinated in March 2020 to help my neighbours. Now I request that you are there for me and my love of this village, as a village.</p> <p><b>4. Lack of amenities</b> The proposal to build shops and other amenities to serve the population of the housing estate AFTER the houses are built is totally ludicrous and the wrong way round since the intervening pressure on the current amenities (and parking) will ensue. The same goes for the extra schools proposed which I think will also have a negative impact on Bucklebury Primary which has already faced funding difficulties as a small rural primary school.</p> <p><b>5. Traffic</b> The strain on traffic along Broad Lane (with the school-run cars for Bucklebury Primary School is already a problem) as well as an unacceptable increase in traffic on Burdens Heath where there is already a speeding problem. The safety of school children walking on Burdens Heath, where there is no pavement, makes this a particularly dangerous proposal.</p> <p>During a recent presentation by Mr. Southam, it was interesting to hear of the estimated 12% increase in traffic heading up Harts Hill Road and towards Upper Bucklebury. This is already significant on such a dangerous hill but is likely underestimated. The risk is that the increased congestion on the A4 and Floral Way (already an accident black-spot) leads to more ‘Rat Run’ traffic through Upper Bucklebury, Bradfield Southend, Woolhampton, Beenham and Midgham to name a few.</p> <p><b>6. Pollution and creation of environmental problems.</b> a. Any development of this rural area will result in an increase in traffic pollution which, in my view, is an irresponsible disregard to the health and safety of the local residents.</p>	<p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just</p>

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	<p>b. The currently proposed 'green buffer' that adjoins Long Grove is woefully inadequate.</p> <p>c. A large number of wildlife that already populate our rural surrounds – munt jack and other deer, badgers, foxes, a diverse range of birdlife as well as all the rodents and insects that form part of our biodiversity and ecological chains of predation, may be decimated or at least lose a large area of their current habitat. WBC has a clear statement on this: "Loss of habitats or habitat change as a result of inappropriate management are one of the most damaging threats facing rare species in Berkshire. These habitats should be safeguarded wherever possible and appropriate advice sought on managing them to conserve the natural diversity of life and to halt the extinction of species diversity not only in Berkshire but also in the UK. "</p> <p>d. The Floral Way boundary, formerly formally adhered to will, in effect, be broken.</p> <p><b>7. Inadequate health services to the current residents</b></p> <p>The current health services available to residents of Thatcham and the larger area are already inadequate in that there are waiting lists to become an NHS dental patient or doctor's patient. How can these over-stretched services possibly provide for new residents as well?</p> <p>In conclusion, I urge West Berkshire Council to object to any development proposals to the north and north-east of Thatcham which is unsuited in terms of infrastructure as well as geography and the transport network.</p>	<p>changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>

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Daniel Cox (lpr1047)	I am writing to you in relation to large new housing development in Thatcham. I would like to object this application due to the lack of infrastructure in the Thatcham area as well loss of rural countryside.	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Sara Inskip (lpr1048)	Firstly this is massive over-development of the Thatcham area, for which infrastructure and services are already seriously lacking. There are not enough GP surgeries, dentists, schools or hospital services for the residents already in the area, so adding another small town to the edge of Thatcham seems disproportionate and will put those of us already living in the area at a huge disadvantage.	Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy

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	<p>The area is so green and beautiful, this development would lead to a devastating loss of rural countryside and of the Thatcham green belt. The appeal of West Berkshire are our beautiful green areas and this would again be a huge loss for the current residents of the area.</p> <p>The impact on traffic around Thatcham, Newbury and the surrounding villages will be massive with the majority of the roads already unfit for the amount of traffic. This will lead to pollution, air and noise, which the current lack of again is what sets this beautiful part of the country apart from the eastern developed areas.</p> <p>I seriously hope that the above will be considered and that this development is removed from the plan.</p> <p>Changes: If housing is needed there are plenty of brownfield areas around Newbury that could be considered over and above this. Thatcham doesn't need nor have the infrastructure for more housing.</p>	<p>notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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		<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be</p>

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		important to respect and enhance the character and appearance of the area.
Ben Richardson (lpr1050)	<p>I am one of a number of households on Berrys Road who objects to the new development in Thatcham.</p> <p>The loss and damage to wildlife is immeasurable, not to mention the environmental impact and strain on local services.</p> <p>I would like a full explanation as to why all the development needs to be in this one location, an area of West Berkshire that has already seen a huge amount of rapid growth. Why do you not consider a number of sites and spread the strain?</p> <p>My primary concern is for my children, the effect on our school and local roads. We moved to the area as I want them to experience rural life, not to be engulfed by a new town that is already struggling through over population.</p> <p>Changes: Spread development over a number of sites.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>



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Felix Hartley Russell (lpr1051)	<p>I am writing to object to the potential development of 2,500 houses to the North East of Thatcham.</p> <p>The area is already poorly under resourced in terms of amenities and decent infrastructure i.e schools and the pressure of 2,500 houses on this will prove catastrophic.</p> <p>The area provides an important buffer between Thatcham and Upper Bucklebury that with the development will see the two locations merge. This will put an unimaginable amount of pressure on the common and other countryside benefits nearby.</p> <p>I hope that you listen to the voices of the those that currently live in the community. I imagine there are numerous more suitable locations a development of this magnitude would be more appropriate.</p> <p>Changes: Alternative locations for development.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
Miranda Dorich (lpr1061)	<p>I am writing to object to the potential development of 2,500 houses to the North East of Thatcham.</p> <p>The area is already poorly under resourced in terms of amenities and decent infrastructure i.e schools and the pressure of 2,500 houses on this will prove catastrophic.</p> <p>The area provides an important buffer between Thatcham and Upper Bucklebury that with the development will see the two locations merge. This will put an unimaginable amount of pressure on the common and other countryside benefits nearby.</p> <p>I hope that you listen to the voices of the those that currently live in the community.</p> <p>Changes:</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the</p>

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	I imagine there are numerous more suitable locations a development of this magnitude would be more appropriate or smaller developments spread over a number of sites.	continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.
Sarah Leijten (lpr1084)	<p>We live in an AONB and you are proposing a monumental development that takes out pristine rural land in a time when climate and environment should be uppermost in our minds.</p> <p>This is a travesty and I'm staggered you can even consider something on this scale. We do not need a new town or village here. Some housing yes but nothing like what you are suggesting. And most certainly not on beautiful green belt land.</p> <p>I strongly object and you need to rethink about this whole project. Shocking and shameful that you are even considering something on this scale.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside</p>

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		<p>Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Miranda Fowler (lpr1083)	<p>I am writing with my objection to the planned development in Thatcham of a further 2500 houses. This is a complete over development of Thatcham and its facilities. I live at Dunstan Park and walk these fields regularly and the loss of rural land would be a tragic loss to the local area. On top of that the traffic, doctors and local schools cannot cope with increased demand.</p> <p>Additional comments sent -</p> <p>I writing with my concerns of the recent news that 2500 houses are planned to be built on the countryside to the north of Thatcham. As a local resident all my life and currently living on the Dunstan park estate this would have a devastating effect to the local area. Thatcham has already out grown the limited facilities we have access to, the schools are full meaning children have to go out of catchment, it is impossible to get a doctor's appointment already and have to wait on the list to see the dentist.</p> <p>The local roads and station crossing are already busy without attracting loads of new people to the area, and adding more traffic to Floral way that can already be a dangerous and fast road.</p> <p>Added to that this green belt is important to Thatcham, we have lovely country side and wildlife on our doorstep and that's what makes it such a lovely place to live. Added to that I have family living in Bucklebury and by</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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	<p>bringing the 2 places closer together will sadly mean that Bucklebury and other small villages will start to lose their independence and local community feel.</p> <p>We spend most weekends walking around this lovely area and I find it really sad to think that in the next few years this could all be gone, we often see wildlife and other people out enjoying this area with their children.</p> <p>I feel that 100% there are better locations locally for this amount of houses, and hope as a local council these are all being considered.</p>	<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Elizabeth Barry (lpr1085)	<p>I am writing to object to the plan to build 2500 houses between Thatcham and Upper Bucklebury. This will, if agreed, result in huge overdevelopment in an area which has inadequate roads and insufficient resources. It will destroy the rural countryside and create huge traffic problems</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

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		infrastructure, active travel routes, education and community facilities, and highway improvements.
Andrew and Kerry Clark (lpr1086)	writing to register our strong objection to the proposed emerging plan for the development of 2,500 houses to the North East of Thatcham.	Noted.
Bob Anderson (lpr1087)	<p>I wish to register my objection re the proposed planning of 2500 houses in the area of Floral Way. My objection are.</p> <ol style="list-style-type: none"> <li>1. Over development within this area</li> <li>2. Loss of rural countryside, we should be protecting the green belt, not destroying it</li> <li>3. Impact of traffic movement based on two cars per family would indicated a lease 10000 traffic movements per day</li> <li>4. Pollution within this rural area</li> <li>5. Currently poor road nett work</li> <li>6. Potential that Upper Bucklebury will become joined to Thatcham in the near future</li> <li>7. Lack of Doctor and school facilities.</li> </ol>	<p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>

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		<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p>

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		<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
Diane Boddy (lpr1095)	<p>This area looks very much like a greenfield area. What has happened to West Berkshire's policy against developing such sites. They applied it fiercely against Lidl's proposed store in Tadley. I hope Lidl's appeal can redress the balance.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Becky Arnold (lpr1094)	<p>I am alarmed to hear to the plans to build more houses on the Thatcham/Bucklebury green space.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge</p>

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	<p>I this area is a big part of my life and we have already suffered considerable green space loses in recent years to the area. In this green space we have much wildlife, nesting birds, and rare species of fungus included one not thought to exist in the south. We need to put money into redeveloping urban areas and NOT to continue to destroy our countryside I/we strongly object</p>	<p>of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Mel Haffner (1088)	<p>I understand that West Berks council have to build new homes but there is very little suitable land to build on in our area and we are being asked to consider squashing too many homes into a small space, too close to an AONB that needs more protection as part of Rural West Berks</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic</p>



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	<ol style="list-style-type: none"> <li>1. Harts Hill is very steep, narrow and full of bends and no room for a pavement. It is completely unsuitable for the amount of extra traffic that this new housing will bring. It would be dangerous.</li> <li>2. Once at the top of the hill if the cars go left the Ridge Road will end up being used as a rat run with people trying to cut through to the A34 or right through Upper Bucklebury and Chapel Row in order to get to the M4.</li> <li>3. If the cars try going over the railway crossing at Thatcham they will be queueing for ages, already many people just turn around after they have waited a very long time.</li> <li>4. This proposed development is much too near the AONB. Bucklebury Common has seen a huge increase in visitors over the last year as people looked for places to walk during the covid crisis. This has resulted in lots of footpaths and parking spaces being churned up. There is a real problem with 4 wheel drive vehicles and off road bikes disregarding the rules and trying to ride through the woods, disturbing wild life, churning the paths up and getting stuck. With all the extra houses and people all these problems will have an even greater effect on our beautiful countryside and wild life.</li> <li>5. Locally many people go our litter picking on the common, the amount of rubbish left is astounding, increased this last year by fly tipping. The litter is a danger to wildlife and this will get worse with more cars driving past throwing items from their windows or dropping in the woods.</li> <li>6. The common is home to so much wildlife, many deer who roam freely and cross the Ridge Road, their lives and habitat will be threatened.</li> <li>7. The wonderful bird life will be threatened too, the woods and common are home to so many, including owls and nightjars. The proposed building is too close to these outstanding natural areas and once land is built on, that's it, the eco system changes.</li> </ol> <p>Please don't destroy this beautiful part of West Berkshire, there are other alternatives for housing.</p>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be</p>

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		<p>published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Prue Fenn (lpr1089)	I would like to place my extreme objections to the above proposal. I am absolutely speechless at your lack of concern for the local community and countryside and for keeping this area of Britain "rural".	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic

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	<p>* The area proposed is currently beautiful open countryside with footpaths, some of which lead to the woods north of Colthrop Manor. There have been sightings of hares to the west of Cox's Lane, as I am sure you appreciate they are an endangered species.</p> <p>* There is no longer any open countryside between Thatcham and Newbury. As it is part of your plan to keep villages separate and to maintain their identity, this is a contradiction of your plan. Surely it must be essential that we preserve the countryside to the east, to ruin yet more countryside would be a tragedy.</p> <p>* Additionally not only is this plan far too large BUT it is on land which is OUTSIDE THE AGREED SETTLEMENT BOUNDARY, adopted by WBC in 2017.</p> <p>* The A4 is a hugely busy road and with an extra 2,500 houses (on average there are 2 cars per household) that would be an increase of 5,000 cars. I do not think the A4 in this area could sustain such an increase in volume. The houses along the A4 in Thatcham already struggle with the vibrations caused by the traffic, not to mention the older houses being affected by structural damage owing to the already overused road.</p> <p>* Thatcham was not built for such a huge development. It has already been overdeveloped. My family moved here in 1970 so we have seen huge changes. It has been developed way beyond what it was intended for.</p> <p>* There is also the huge problem of schools, doctors' surgeries, library etc Thatcham literally cannot sustain such a huge increase to its population and I do not see why it should. Why should Thatcham have yet more development "dumped" on it.</p>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be</p>

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		<p>published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Fiona Sparkes (lpr1090)	<p>I'm e-mailing in objection to the proposed plan to build 2,500 houses on the farm land between Upper Bucklebury and the A4 and Floral Way. The reasons being overdevelopment in the area of outstanding natural beauty and soon we won't be able to see any lush green fields. Secondly it will cause the loss of the Thatcham green belt connecting Upper Bucklebury to Thatcham and resulting in agglomeration of housing estates. Lastly I'm objecting due to traffic congestion and noise and air pollution which will truly be a nightmare.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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		<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>
Jane Cobb (lpr1091)	<p>Please accept this e-mail as our objection towards the proposed development in Thatcham based on the following:-</p> <p>Significant increase in population - what provisions are being made for a Doctors surgery and hospital space, the existing of which are already at full capacity.</p> <p>Significant increase of traffic - we already have a struggling road network around the whole area, take Thatcham Train Station as a good example. The 'rat runs' the villages will be subject to will most certainly increase danger to life, be it walker, jogger, horse rider, cyclist, all of which have increased greatly since 'lockdown ' began. They are mostly single track lanes with very few passing places and blind bends. Harts Hill does not lend itself safely to more traffic with the added danger of it's blind bends and narrow width.</p> <p>Services - we have had a number of issues with our water supply and leaks over the years. Whilst there has been work done to try to improve this we</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>

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	<p>still experience a number of leaks. Can all the services, be it water, waste, electricity etc cope with such an increased demand, and losing more land to help alleviate flooding, where will all the rainfall run off to now as it wont have the fields to help absorb it? A fact that scientists regularly predict will become a more common problem with our changing weather patterns. Whilst we appreciate affordable housing is in short supply, does this area really deserve to be disfigured by a development of this size and, at a time when open green space is being hailed as a 'healer' and everyone is being encouraged to go out and benefit from it, why do we still insist on destroying it, let alone the untold damage we are doing to our wildlife.</p> <p>Thank you for taking the time to read this.</p>	<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>

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Iain & Kelly Russell (lpr2333)	<p>We raise the following objections based on our knowledge and experience of living in the area to ensure that the same planning mistakes made on Kennet Heath are not repeated.</p> <p>The proposed development will generate a significant amount of additional traffic at already busy junctions, of particular concern is the railway crossing. It is unusual to find the barriers up at the best of time and the waits are frequently in excess of 20 minutes and when the barriers do raise they are quickly back down again. The level in increase of traffic generated by the development will result in queues to cross the railway back to the A4 which will effectively block a major thoroughfare between Newbury and Reading and a commonly used diversion in the event of the M4 being closed. These already busy junctions on the A4 will struggle to accommodate the additional traffic even with a bridge across the railway. Such as a major development and infrastructure project in Thatcham must include a bridge across the railway, as per the requirement at Newbury Racecourse, and relocation of the businesses to accommodate it.</p> <p>The additional vehicles will mean an increase in traffic along The Ridge to reach the M4. Already a large proportion of vehicles speed along the 30MPH area, whilst a traffic survey has been conducted it was located close to the bend where traffic would be slowing down anyway so it is not a valid assessment of the speed. This survey needs to be repeated along a more sweeping/straight section of the road to accurately assess the real speed of the traffic. The road also has no footpaths which is already dangerous for children being walked to school and other pedestrian users. In addition to the pedestrians a significant number of cyclists and horse riders use The Ridge which has few places for a vehicle to safely pass, especially roads to the east which have a large number of blind bends meaning that the increase in traffic from the proposed development will increase the danger to all road users.</p> <p>Any such development needs to contain adequate parking arrangements, social engineering was tried on Kennet Heath to reduce the number of cars per household but has resulted in many cars having to park dangerously,</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>

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	<p>near to or on junctions and pavements and a significant amount of residential tension.</p> <p>Effectively building over the fields to the north of Thatcham will increase the flash flooding risk to estates south of the development, this risk is not one that appears on the environmental agencies modelling not part of the standard planning process and will need to be completed and accommodated within the design.</p> <p>There is a significant area of green space essentially the size of a village, why can the amount of housing not be distributed across the West Berkshire region preferably on brownfield sites. The area will also need to undergo independent environmental assessment to determine if there any endangered species.</p> <p>Inclusion of the shops on the estate other than a convenience store will be harmful to the businesses within the town centre as the centre becomes more and more disparate. Significant amounts of investment are required to improve Thatcham town centre to increase footfall and this should be included as part of the development plan.</p> <p>Has any consideration been made as to the impact of changes to working practices been made as there will be a significant amount of empty offices as a result of a wide shift to home working which will free up existing buildings for conversion to residential homes, thereby reducing the magnitude of the proposed development.</p> <p>It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p> <p>A defined pathway for the site to be handed over to the Council for road maintenance etc must be included in plans with penalties applicable to the developer for delays. There are many developments now (Kennet Heath</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>



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	Included) where hand over has been delayed for many years resulting in difficulties selling property.	
Debbie Reynolds (lpr1305)	<p>This response addresses two major documents which have been issued for consultation at the same time. It makes seven recommendations to address weaknesses in Chapters 3, 4 and 5 of the emerging Local Plan and opposes the housing allocation in SP13, especially SP17 North East Thatcham Strategic site. The SP17 proposal is disproportionately big, poorly sited and would have too great an impact on the surrounding population, infrastructure and environment.</p> <p><b>Chapter 3 Shaping West Berkshire Vision and Objectives</b></p> <p>The chapter on ‘Our Vision and Strategic Objectives’ need to be strong and future proofed.</p> <p>The vision statement in para 3.4 is welcome and that West Berkshire’s landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside.</p> <p>However strategic objectives on Heritage, AONB and Green infrastructure do not spell out a compelling vision for nature. Written strategic objectives on nature are sadly lacking. This means the Council’s plan lacks ambition for the future and demonstrates no apparent priority is attached to the natural environment, biodiversity or nature conservation</p> <p>It is remarkable that the clear global concerns on biodiversity, species loss, habitat loss and climate emergency, well-rehearsed in section 5, are so condensed into inanimate, inherited and purely visual aspects of our area. The council should aim do far more to respond to peoples concern that this is not only under threat globally but also imperilled by weakness in their own plans.</p>	<p>Please note, Council responses to comments not relating to SP17 are included within the relevant policy comment response table.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p>

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	<ul style="list-style-type: none"> <li>• <b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b> <ul style="list-style-type: none"> <li>○ Gives a specific means to deliver the vision of abundant biodiversity across the entire area,</li> <li>○ Holds the council to account for concerns of local people on delivery of Section 5 currently called ‘our environment and surroundings’,</li> <li>○ To be measured by conservation of existing assets and the creation of new ones.</li> <li>○ Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by developers.</li> </ul> </li> </ul> <p><b>Chapter 4 Development strategy – our place based approach</b></p> <p>The spatial strategy SP1 and SP2 and supporting text are important. SP1 states: ‘Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements’.</p> <p>However the red-lined envelope depicted in the Thatcham growth study fails to address the necessary separation and is in direct contradiction to this strategy. The separation of Newbury and ‘surrounding rural settlements’ from places identified in the development strategy (e.g. Thatcham regeneration) needs to be strengthened in every aspect of Council thinking and policy.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 2– The LPR must step up and improve its policy, internal and external guidance on separation.</b> The requirement for a strategic gap, to include buffer zones, with recognition of village visions prepared by Parish Councils is</li> </ul>	<p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>

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	<p>essential. It must ensure that sufficient budget is allocated to meaningful strategic separation by developers in their appraisals. Pre-commencement conditions must be set to enforce this.</p> <p>SP2 states the proposed arrangement if an application is deemed to be major development with proximity to the AONB and aspects that further consideration will take account. However the consultation on the Local Plan Review and a simultaneous consultation of a detailed growth study, which is clearly a major development, is a seriously flawed procedure. This is confusing to local people who want to express their views, gives the clear message that the parameters in the plan are already fixed and therefore one or other consultation has a predetermined outcome. In addition the time table for two such large consultations is unfair.</p> <ul style="list-style-type: none"> <li> <b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP. </li> </ul> <p>Spatial strategy SP3 and 4 reflect many aspect of national policy. However there is no evidence that the policy alteration associated with exclusions around AWE Burghfield or Aldermaston have been taken into account centrally, thereby updating the national allocations. Residents can rightly expect the Council to have challenged this at the highest level, including by Judicial Review, before producing a plan B such as the Thatcham development. All the materials in the review predate the dramatic alterations associated with online shopping and the COVID-19 pandemic. Therefore it is clear that the housing allocations are flawed in several respects.</p>	<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<ul style="list-style-type: none"> <li>• <b>Recommendation 4 – provide clear evidence of UpToDate national comparable figures for developable land.</b> This must demonstrate that reassessment centrally has been undertaken, demonstrate the impact of this and COVID-19 are all accounted for in the Local plan review. Set demanding targets for conversion of brown field commercial property to residential.</li> </ul> <p><b>Chapter 5 Our environment and surroundings – responding to climate change</b></p> <p>There are several important and strategic statements to emphasise here, in particular:</p> <p>‘To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11</p> <p>Ecological distinctiveness – design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11</p> <p>A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings.</p> <p>Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>

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	<p>to nature recovery networks.</p> <p>However the absence of the strategic priority reduces their impact and will not ensure their delivery.</p> <ul style="list-style-type: none"> <li> <b>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b> This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect. </li> </ul> <p><b>Chapter 6 Delivering housing</b></p> <p>SP 13 lists the sites for residential and mixed use in Newbury and Thatcham for sites 1 ha or more. Here it adds in NE Thatcham as SP17 for the first time. This draft local plan review and associated report therefore set out a huge increase in development area and house numbers.</p> <p>There is no justification for such an increase in allocation, and in SP17 the proposal of 2500 houses is completely disproportionate for Thatcham and surrounding areas. In the opinion of Bucklebury Parish Council the figures are flawed and therefore withdrawal for a fundamental review and meaningful justification is essential.</p> <p>The impact on the local setting and breach of the Floral Way boundary, objections raised by the North Wessex AONB, are not addressed. No case has been made for ribbon development and the ‘Colthrop village’ concept is a completely unacceptable joining up of Midgham and Bucklebury Parishes with Thatcham and should be removed from any future considerations.</p>	

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	<p>Any housing allocation must demonstrate local benefits to the natural environment.</p> <p>The model for infrastructure provision is dependent on realising house sales, therefore is not 'baked-in' or inevitable. A transparent, enforceable commitment to ensure fair share of profit and investments in local assets is an essential pre-commencement commitment which should be policy for any development.</p> <p>The level of ambition for infrastructure provision and biodiversity gain is insufficient. No budget is allocated to achieving 10% biodiversity gain in the appraisal of viability, the design features do not demonstrate any input from conservation professionals, nationally or locally.</p> <p>Green and biodiverse are not equivalent. The concept, beneficiaries and impact of a new strategic country park are unclear. Any future consideration of the idea must make clear that is outside the area of allocation and protected in perpetuity.</p> <p>If land at 'Colthrop village' is no longer needed for farming it should be entirely devoted to biodiversity net gain and used to establish a fully functional wildlife corridor between the Kennet valley and Bucklebury heathland.</p> <p>Numerous aspects of the Bucklebury vision have been ignored. It is appears that the views of residents on the edge of the proposed area were either not sought or not taken into account.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 6 – SP13 is unacceptable and needs alteration, particularly removal of the proposed NE Thatcham line item.</b> All the reasons are set out above and in the Bucklebury Parish Council and Thatcham Town Council submissions.</li> </ul>	

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	<p><b>SP17 North East Thatcham Strategic site allocation</b></p> <p>SP17 sets out that ‘The Council will be supportive of proposals which have regard, and positively respond, to the master-planning work contained in the Thatcham Strategy Growth Study (2020)’. It then lists features the NE Thatcham Strategic allocation may be expected to deliver. However the residents of Bucklebury and Thatcham do not see it that way and their responses should give the Council grave cause for concern. The main objections are listed below:</p> <ul style="list-style-type: none"> <li>• Flawed housing demand analysis</li> </ul> <p>The analysis of housing demand predicating this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking WBC’s own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed.</p> <ul style="list-style-type: none"> <li>• Strategic Gap</li> </ul> <p>A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed.</p> <ul style="list-style-type: none"> <li>• Traffic</li> </ul> <p>A development of the scale proposed will generate considerable traffic but the analysis in the proposal underestimates the volume and impact on the</p>	

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	<p>Parish. It is assumed that the bulk of the new traffic will use the A4, accessed via Floral Way. However, the A4 is already overloaded at peak times and new residents will look to find alternative routes. These inevitably will be through the Parish for those looking to access the A34 and the M4. The roads through these villages are ill suited to additional traffic; they are rural, single carriageway roads mostly lacking footpaths and featuring blind bends. Speeding is a well known problem in the Parish and more cars will make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and will endanger children walking to school.</p> <ul style="list-style-type: none"> <li>• AONB and Bucklebury Common</li> </ul> <p>It is clear that the proposed development to the north-east of Thatcham involving 2500 houses would have a big influence on the local wildlife.</p> <p>The proposed development abuts Bucklebury Common and AONB. This development would have a lasting and negative impact on these special environs. The impacts fall into two categories; those that impact the AONB directly and those resulting from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. Importantly the plants in and bounding the AONB will suffer and the Common will be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles. The visitor numbers, from the proposed development, would exacerbate damage to a struggling ecology.</p> <p>Bucklebury Common, one of the few remaining areas of lowland heath lies just a kilometre or so to the north-east. It is well known for some special birds in particular the nightjar, but also the woodlark, tree pipit, stonechat and woodcock. These nest on the ground are very susceptible to disturbance especially by dogs. The development would put much more</p>	



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	<p>pressure on the heath and make successful breeding of these species much less likely.</p> <p>So the council's attention should focus on this impact of the proposed scheme not highlighted in the Biodiversity and Green infrastructure. Just visible at the north east edge of the plan on page 36 is the edge of Bucklebury Common, the eastern portion of which (east of the settlement of Upper Bucklebury) is an area of lowland heath, which has been restored by conservation management. This site is already subject to considerable recreational pressure. Heathland is a priority habitat identified in the Berkshire Local Nature Partnership Biodiversity Plan, and holds breeding populations of two of the priority species in the plan, Nightjar (<i>Caprimulgus europaeus</i>) and Woodlark (<i>Lullula arborea</i>). Another species on the UK's list of "Red Data" birds, Woodcock (<i>Scolopax rusticola</i>) also occurs, a species which has suffered a dramatic contraction in its UK breeding range (more than 50% in the 25 years to 2010) and numbers. These are ground nesting birds, vulnerable to disturbance. The wider area forms one the Berkshire's Biodiversity Opportunity Areas (BOA), known as Bucklebury Plateau (see - <a href="http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf">http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf</a>)</p> <p>As no doubt the council is aware, lowland heath is a threatened habitat important for a number of species of wildlife. Its global distribution is limited, with the UK having about 20% of the world's remaining area. About 80% of the UK's lowland heath has been lost since 1800. The Thames Basin Heaths of north Hampshire, west Surrey and south east Berkshire are an area of Special Protection (SPA) and now benefit from planning policies requiring the provision of suitable areas of natural greenspace (SANGS) as mitigation for any new residential development within 5 km of the heathland areas.</p> <p>In this case the site would introduce 2500 new households almost all within 2 km of Bucklebury Common, and we consider that mitigating the impact of the increased recreational pressure, and the opportunity to enhance biodiversity should have formed part of the scheme, consistent with current</p>	

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	<p>Local Plan Policy CS17, emerging policy SP11 and NPPF paragraphs 170 and 175.</p> <p>The restored area of Bucklebury Common referred to above is currently a relatively small fragment of heathland maintained by voluntary effort. It does though form part of a larger area within the Bucklebury Plateau BOA extending to the west of Upper Bucklebury that has potential for habitat restoration as heathland.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 7 – remove SP17 from the Local plan review.</b></li> </ul> <p><b>Conclusion</b></p> <p>In summary, I have serious concerns about the emerging draft Local Plan which can be addressed through adoption of the seven listed recommendations. Otherwise the impact on West Berkshire, Thatcham and especially the village of Upper Bucklebury will be very damaging. With increased traffic, a steady flow of visitors the consequential damage to the local environment, the character of our area would change forever and not for the better.</p> <p>Recommendation 7 – remove SP17 from the Local plan review. Conclusion</p> <p>In summary, I have serious concerns about the emerging draft Local Plan which can be addressed through adoption of the seven listed recommendations. Otherwise the impact on West Berkshire, Thatcham and especially the village of Upper Bucklebury will be very damaging. With increased traffic, a steady flow of visitors the consequential damage to the local environment, the character of our area would change forever and not for the better.</p> <p>The representation questions to adequacy of protection of "Nature for Future Generations" (to include a Nature Delivery Plan); the necessary separation</p>	

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	<p>of Thatcham (and other Parishes) from Newbury; the flawed procedure relating to the Thatcham growth study and its simultaneous consultation with the LPR to the disadvantage of local community; the lack of challenge by the Council to "national allocations" in the light of the AWE exclusions and the impact of COVID and on-line shopping; the increase in overall housing numbers is not justified and the proposal for Thatcham is disproportionately large with a lack of consideration and provision for infrastructure, the natural environment and local community vision.</p>	
<p>Louise Norton (lpr1311)</p>	<p>Please may I voice my concerns about the proposed housing development in Thatcham Lawrence Lane/Floral way.</p> <p>We already have an overstretched health service and educational allowing this additional residents/households will undoubtedly cause the schools and the health centres to be overwhelmed.</p> <p>Local residents have to wait well over the average time for an appointment having these additional housing will impact directly on patient care.</p> <p>Another concern is the additional traffic to an already busy roads and the disruption of wildlife.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The</p>

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		<p>package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Glen Higgins (lpr1092)	<p>I am writing to express my objection to the proposal to build a further 2500 homes in Thatcham.</p> <p>I have lived in and around Thatcham for over 20 years and cannot support the plan for such a lot of extra housing on a greenfield site. I object on the grounds of the overdevelopment in a small town which is already stretched to breaking point in terms of infrastructure,- i.e. schools, gp services, traffic and other public facilities as well as the extreme pressure on the rail crossing at the station.</p> <p>I think this plan needs to be reconsidered in the light of these factors and either retracted or reduced to take account if the extreme pressure this will put on the local area.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements</p>

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		<p>being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
<p>Martin Sparkes (lpr1096)</p>	<p>I would like to register my objection to the proposed development of 2500 houses on land between Upper Bucklebury, the A4 and Floral Way. This overdevelopment would lead to:-</p> <ul style="list-style-type: none"> <li>• loss of rural countryside</li> <li>• loss of Thatcham green belt,</li> <li>• increase the level of traffic and congestion and associated pollution</li> <li>• would put additional strain on the already stretched infrastructure in the area</li> </ul>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>

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		'living document' and will be updated regularly updated in consultation with infrastructure providers.
Mr & Mrs Minchington (lpr1097)	<ol style="list-style-type: none"> <li>1. This proposal will change Thatcham from a rural country town to a sprawling metropolis.</li> <li>2. It will adversely affect traffic in the area:</li> <li>3. The main through highway, the A4, will not cope with through traffic and will be a major bottleneck</li> <li>4. The bottleneck will generate congestion in all of the surrounding villages as commuters seek alternative routes</li> <li>5. Thatcham Railway station will be inadequate for the increased population</li> <li>6. There will be a greatly increased congestion at the Thatcham Railway crossing</li> <li>7. The proposed development of 2,500 new houses and associated traffic will generate an enormous increase in carbon emissions which will greatly affect Thatcham and the surrounding villages</li> </ol>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Rosie MacGregor (lpr 1098)	<p>I am a resident in Bucklebury and very concerned at the impact of an additional 2,500 houses in the immediate vicinity. I fully understand the need for more housing, and appreciate the constraints on West Berks council in finding appropriate sites. I have no objection to increased development in the Thatcham area, particularly if it means</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA</p>

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	<p>creating a better planned and more appealing town. However the scale of the planned development is intolerable for any community. We are surrounded by single track roads with limited passing places, a level crossing that closes for lengthy periods of time and causes long build-ups of traffic, difficult access to the M4 (westwards) and A34, other than going through an already clogged Newbury, or via the twisting and narrow Hermitage route.</p> <p>It is neither reasonable nor realistic to expect our community to absorb such an increase in population and housing. I would ask the council to register my objection to this plan.</p>	<p>report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>



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		<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Trevor Franklin (lpr1105)	<p>We have lived here for over 40 years now and have seen a massive change since moving here from near London. I think the proposal for 2500 houses is absolutely disgusting we have our Doctors Practice only giving 10 mins or less so they can cope with all the new people coming into the area. That would make around 7500 new patients and possibly that amount of cars on the road.</p> <p>The developers don't give a monkey about where they build as long as it brings in profit the owners live in massive houses with acres of fields around them, if this happened near them, they would kick up a fuss just like people here will do, I hope.</p> <p>We don't have enough schools for the kids now let alone if another 2500 come here or Doctors Surgery my doctor has 3000 patients alone so don't tell me that its going to improve things because it won't it will make the are worse than it is now.</p> <p>There will be 7500 more on the roads plus more cars parking on roads to will be an issue as developers like to cram in as many as they can in an area and stuff the consequences to people living there.</p> <p>I want it know I hope this development along with the one down Lower Way is shelved we don't want any more people till the services are bang up to date and by that I mean not just a school to cater for the building being done but enough so the existing ones can have a more up to date school</p> <p>Changes: I hope this development along with the one down Lower Way is shelved</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The</p>

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		package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Tim Williams (lpr 1106)	<p>The local plan review draft dated December 2020 proposes the development of 2500 houses to the North East of Thatcham. I attended a Bucklebury Parish Council consultation in January 2021. I was informed that this area is not the preferred option for the development of a residential district, but that West Berkshire Council had been forced by the widening of the Burghfield AWE DEPZ and the failure of the developments South of Newbury to progress. We have seen that the other constraints on planning policy in West Berkshire are forced in to a relatively small area due to the AONB and the flood plains of the Thames, Kennet and Lambourn Rivers. We note too that it is West Berkshire Council policy to run a carbon neutral system by 2030.</p> <p>We are writing to object to this proposed development on the grounds of inadequate infrastructure planning, a failure to provide adequate safeguards for the Green Gap to the North of Thatcham and lack of adequate planning for traffic flows.</p> <p><b>Risks</b></p> <p>The development identified falls partly within the Aldermaston OCZ on the proposal's Eastern boundary.</p> <p>Parts of the proposed development would impact on water flows in to the current settlement of Thatcham.</p> <p><b>Inadequate infrastructure</b></p> <p><b>a. Health</b></p> <p>The plans presented do not identify health infrastructure. I understand that this requires cooperation with the relevant NHS body, but there is no mention of this in any plans that I have seen. It would be sensible to require</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p>that the developers <b>provide a site for further doctors surgery/health centre</b> in Thatcham and a contribution to the development of the Newbury and District Community Hospital..</p> <p><b>b. Transport</b> The plans do not identify public transport networks that will be required to mitigate the numbers of new residents travelling to work from the area North East of Thatcham. The distance from Thatcham station is likely to inhibit individuals from travelling by train and the major bus routes do not reach this area except at the extreme Eastern End on the A4. As a result there will be increases in traffic flows on existing roads including Lawrences Lane, Harts Hill Road and Cox's Lane. Of these Lawrence's and Cox's Lanes are single track winding roads with few passing places. Harts Hill road is a winding two track road with steep gradients which leads traffic in to the AONB and the villages of Bucklebury, Chapel Row and Bradfield Southend. This road will become a favoured route for drivers during the rush hours because it is faster than the parallel A4 to Reading. Part of the development should therefore include <b>traffic calming</b> measures to discourage use of the road as a rat run. I understand that there are proposals to change the road layouts to ensure that through traffic does not use Floral Way in preference to the A4. It appears to us therefore that there will need to be some improvements to the <b>traffic flows</b> along the A4. This might include a requirement on developers to contribute to the cost of providing the overbridge for the railway in Thatcham. <b>Cycling</b> does not appear to have been considered as a major transport modality. Cycle paths should be developed along the A4 corridor that separate cyclists from both pedestrians and motorists.</p> <p><b>Risk to landscape</b> Although the plans of proposed buildings do not include the slopes of the hills leading to the boundary of the AONB, there is no provision for safeguarding the landscape amenity value of the slopes. As an example, one might cite the view from the end of Long Grove where it meets open farmland. We would like to see some form of <b>legal protection for the green</b></p>	<p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the</p>

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	<p><b>gap</b> between Bucklebury and Thatcham perhaps in the form of designating the slopes as community land with only farming and leisure use being allowed for the future. This could be achieved as a covenant added to the planning agreement.</p> <p>Changes:</p> <p><b>Summary of suggestions</b></p> <ol style="list-style-type: none"> <li>1. A site be designated for a health centre/doctor's surgery as part of the developer's contribution</li> <li>2. Traffic flows should be designed to divert traffic away from Lawrences Lane, Harts Hill Road and Cox's Lane.</li> <li>3. Cycle paths be constructed as part of the development.</li> <li>4. A public transport contribution be required from the start of development</li> <li>5. The green gaps identified be legally protected as part of the agreement to planning</li> </ol>	<p>IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory</p>

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		text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.
Wynne Frankum (lpr1108)	<p>I am concerned about this development for many reasons. Below I have listed some that most concern me:</p> <p><b><u>Bucklebury Vision.</u></b> This plan is contrary to Bucklebury Vision which states: <b>Overall picture.</b> <i>To ensure the future viability of the community is maintained. To maximise rural conservation and protection from pollution.</i> <b>Community and population.</b> <i>The local residents highly value the rural nature and natural beauty of the area in which they live and are keen to protect this for future generations to enjoy.</i> <b>Landscape and Environment.</b> <i>3G2. the natural beauty of the landscape, visual quality and amenity of the area should be conserved and enhanced.</i> <b>Highways, Communications and Traffic</b> <i>6G1. any development which creates unacceptable levels of traffic would be resisted. 6G2. the reduction of vehicular traffic in order to reduce traffic on unclassified roads is supported.</i></p> <ul style="list-style-type: none"> <li>Upper Bucklebury is a vibrant village sharing a strong community spirit with the rest of the parish. Peaches Stores and the cottage Inn are both Community Assets reflecting the importance in which they are held by parishioners. Peaches Stores offers a vital service to locals but the shop also relies on the custom of passing traffic .It is proposed that there would be a new roundabout on the Harts Hill into which roads from the new estate would feed and where it is proposed to build shops.. If this were to go ahead it could jeopardise the viability of Peaches Stores. Many locals walk to the shop, significantly reducing the carbon footprint. These are strong reason for protecting this valuable village asset</li> </ul>	<p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected</p>

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	<p>The northern boundary of the proposed development is Blacklands copse and Long Grove Copse, close to the parish boundary. This application would have a detrimental impact on the land and villages to the north, particularly Upper Bucklebury and the surrounding parish.</p> <p>The transport assessment is not satisfactory. The A4 is already heavily congested and the facilities at the station inadequate .An substantial increase in use of the Harts Hill, Broad lane and surrounding rural narrow roads would be of grave concern to the parishioners of Bucklebury.</p> <p>I was a member of BPC for 25 years and Chair for 12 until 2019.During that time there were two main ongoing concerns in the whole parish; increased traffic volume and speed throughout the parish .The Harts Hill and Broad Lane are currently used as a rat run for traffic going both N. E. and W .If this development went ahead the problems this causes would be substantially increased.</p> <p>The second major concern was the recreational use of 4x4's and motorbikes on the common causing significant surface and environmental damage . Noise pollution on the common and the danger to pedestrians were also problems.</p> <p>The footpath from Colthrop to Long Grove runs through the proposed estate. Long Grove is an unadapted road maintained by the residents. It has seen increased footfall from people accessing Bucklebury and the surrounding country side during Lock down causing it to deteriorate. This use would increase substantially. The residents should not be expected to maintain a public right of way that could see heavily increased use of pedestrian and bikes.</p> <p>This right of way would bring substantial numbers of people seeking informal recreation, both cyclists and pedestrians, into all parts of the parish. Our parish contains rare habitats including lowland heath and ancient woodland .These are fragile and would be adversely affected if many more people used the area for recreation. In particular the rare nightjars, which are ground nesting birds, would be greatly disturbed in the nesting season particularly by dog walkers. Should this development go ahead, in order to protect and mitigate the increase in population on the surrounding countryside, adequate recreational facilities should be provided on the site. These should include playing fields, children's play areas and sports</p>	<p>increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>

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	<p>facilities. All these facilities should be included in the budget, as well as the country park which needs a far more detailed environmental plan.</p> <p>There is no commitment within the document to regenerate or provide investment in Thatcham town centre despite the rapid growth and lack of investment in the town over many years.</p> <p>The infrastructure plan was not published.</p> <p>There is no commitment to a zero carbon footprint, despite that being a commitment by WBC and Thatcham Town Council to be carbon neutral by 2030.</p> <p>I have read many of the concerns fellow parishioners have raised during this consultation and I share them all,</p>	
Alan and Brenda Dunkerton (lpr1109)	<p>As residents of the village of Upper Bucklebury for the last 29 years and enjoying its most delightful rural environment we would like to place on record our most strenuous objection to this quite unnecessary proposal which in our view is not required at this location, it will effect the rural enviroment of this peaceful locality to the detrement of the residents and wildlife of this green and pleasant land, if these houses are required there must be more suitable locations in West Berkshire that would cause much less damage to the rural environment.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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		<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Robert Jolley (lpr699)	<p>The development is of totally unsuitable size, will overwhelm the area and destroy its character. The site is totally inappropriate, extending Thatcham beyonds its current natural curtilage and destroying valuable open space and greenfield sites. It is the worst sort of urban sprawl and runs entirely contradictory to WBC stated and correct preference for development to be on brownfield sites.</p> <p>Changes: I would like the plan to be dropped entirely and the land left as the farmland it currently is.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
J Price (lpr1110)	I wish to object most strongly to the proposal to build 2,500 houses between Upper Bucklebury, my reasons are as follows.	Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge



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	<p>Too many rural villages are being swallowed up by urban sprawl. Upper Bucklebury is a popular village in the heart of beautiful countryside, to join it to Thatcham would be a travesty.</p> <p>Thatcham would lose its green belt and traffic would increase considerably to Newbury and Reading and to local roads.</p> <p>Kennet school is already bursting at the seams.</p> <p>Pollution would increase considerably</p> <p>All schools, surgeries etc would be severely affected. Thatcham Crematorium is already expanding at a rapid rate and would very soon run out of space</p>	<p>of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The</p>

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		<p>package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Belinda Matthewman (lpr1111)	I live in Beenham. I would like to object to the proposed Thatcham development . This is an enormous development which will result in huge traffic congestion and increased pollution . The loss of rural countryside will be devastating to the environment. It will destroy the Thatcham green belt	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic

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	<p>which is essential to the environment and wellbeing of the present inhabitants. The developments along this area are already enormous and the traffic along the A4 unbearable.</p>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
R Hadley (lpr1112)	<p>How much more of this country is going to be built on before someone sees sense and calls a halt. You have already filled in between Newbury and thatcham and now you want to build east towards Reading and no doubt Reading will be looking to build west so in a few years Reading Newbury and all points in between will be one big urban sprawl. ENOUGH is ENOUGH build only on brownfield sites and save the green spaces of the shire counties!!!!</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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		<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p>
<p>Anne Matthews (lpr1113)</p>	<p>I would like to submit my concerns about the effect the above proposed development would have on the surrounding area.</p> <p>The local roads would become more congested. The level crossing at Thatcham station would become even more of a bottleneck and cause people to find alternative routes through nearby villages on roads not suitable for heavy traffic.</p> <p>The footpath from Colthrop to Upper Bucklebury would provide easy access to Bucklebury Common. Extra footfall on the Common would disturb ground nesting birds, such as the Nightjar, which the Bucklebury Common Conservation Group have for many years strived, successfully, to encourage and protect.</p> <p>The Barn Owl Group, part of West Berkshire Countryside Society, have 9 active Barn Owl nest boxes within 2 Km of the proposed development. The loss of green fields, which provide feeding grounds for the owls, would have an adverse effect on their breeding.</p> <p>The current GP surgeries are already at full capacity so cannot provide care for more patients.</p> <p>More parking in Thatcham town centre and at the station would need to be provided.</p> <p>We are being encouraged to plant more trees to help towards alleviating global warming. If we need more housing, it would be more environmentally</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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	<p>friendly to re-develop brown sites rather than encroaching on the green field sites in the countryside.</p> <p>A thorough environmental survey would need to be carried out to assess the impact of such a development on our precious wildlife.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Janet and Jeff Ford (lpr1114)	<p>We are residents of Upper Bucklebury</p> <p>There are a number of concerns that we have which may affect the residence of Upper Bucklebury due to the expansion of Thatcham by building 2,500 new homes.</p> <ol style="list-style-type: none"> <li>1. When driving to Thatcham there will be ongoing disruption for a number of years due to building works. We only have Harts Hill Road which is wide enough for us to use. Diverting to Cold Ash causes problems for them and is a long detour for us. Cox's lane is very narrow. Can this be taken into consideration when scheduling works?</li> <li>2. A survey could be carried out to look at the potential impact to our village e.g report shows 12% more traffic. Environmental impact of more people using the common for recreation. Businesses in the village may benefit from addition customers. Funds to improve the village hall etc.</li> <li>3. The additional shopping area that is planned in the new development may take business from the existing shops which are</li> </ol>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning</p>

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	<p>at the bottom of Harts Hill, it may reduce their incomes. Better to upgrade what is existing, which could be easily accessed by a safe crossing to the the new homes.</p> <p>4. Will there be a pathway from our village to walk to the shops at the bottom of Harts Hill?</p> <p>5. In order for Upper Bucklebury residence to feel confident of maintaining an independent village rather than becoming part of Thatcham can an assurance be given that the land that will become the Country Park, remain undeveloped in the future.</p> <p>6. We are concerned about the amount of traffic that will increase through our village and Thatcham.</p>	<p>and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
Helen Woodford (lpr1116)	<p>I wish to inform you of my strong objection to the proposed 2500 houses on the farmland between Upper Bucklebury and the A4 and Floral Way.</p> <p>I have lived in Reading for 58 years and recently moved to Upper Bucklebury to enjoy the open countryside and the lifestyle that affords me. I have experienced extensive development when living on the outskirts of Woodley &amp; Lower Earley and the detrimental effect it has on the infrastructure, traffic, over-crowding at schools and not providing any additional leisure facilities.</p> <p>I strongly object to over developing this area of natural beauty and losing the green belt between here and Thatcham. I understand the need for more housing but I am of the strong belief that we should continue to develop all available brownfield sites before developing what would be a densely populated 'small town'.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements</p>

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		<p>being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
Patricia Jones (lpr1117)	<p>I wish to express my objection to the above development plans on the following grounds.</p> <p>A concentrated development of the size proposed would increase the traffic in the local area enormously, resulting in an unsustainable rise in road traffic on roads and country lanes not built for such heavy usage. Many of the local roads do not have pavements and are already hazardous for pedestrians, particularly children walking to and from the villages and school buses. This scheme would increase the traffic and danger to those pedestrians. It would also increase the pollution of the local area.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant</p>

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	<p>I also objection due to the fact that there would be a loss of open spaces and significant damage to rural habitats.</p> <p>I would appreciate it if my objections be noted</p>	<p>impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>
<p>Tim Karpinsky (lpr1118)</p>	<p>I would like to fully support this proposed development.</p> <p>The proposed site it in a good location and there is already a main road infrastructure that will help to disperse additional traffic movements.</p> <p>We need to be building houses, there is a great national shortage and restricting developments to brownfield sites and converting existing commercial buildings into flats Is inadequate.</p> <p>Rural locations are not just for the few, I would like to think our children and grandchildren can also be given the opportunity to live in a greener environment.</p>	<p>Comments of support noted.</p>



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Roy Lawson (lpr1119)	<p>Their is already efforts to calm the traffic movements in Broad Lane and Burdens Heath, the proposed development housing towards the bottom of Harts Hill Road can only magnify the existing problems.</p> <p>Broad Lane and Burdens Heath together with Chapel Row, Bradfield and Cold Ash are already popular routes to the Reading and Newbury area plus the multiple direction M4 junctions 12 &amp; 13.</p> <p>Harts Hill Road is winding and single lane with steep incline, additional traffic can only have an adverse effect on air quality and already restricted traffic movement.</p> <p>Added traffic movement south will add to even further time delays to the already congested Thatcham Rail Crossing.</p> <p>Additional housing to the north east of Thatcham will mean a notable loss of rural countryside.</p> <p>A large increase in local residents means more visitors to Bucklebury Common and probably more dumping of rubbish and disposal of garden waste which is a danger to the natural habitat.</p> <p>Their is also the increased possibility of Fly Tipping and misuse of byways by Off-Roaders and Motor-Cyclists.</p> <p>This development proposal can only mean additional Common Clearing and Observations by Upper Bucklebury Parishioners</p> <p>A further consideration is more visitors to Upper Bucklebury will result in the need for Additional Parking Provision in the area.</p> <p>An AONB will be lost during construction and completion of the proposed sit</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and</p>

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		<p>walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
R Wright (lpr1120)	<p>I am writing to lodge my objection to the proposed development of houses in Thatcham.</p> <p>I consider it to be an over development of what is already a heavily developed area in terms of housing stock. The infrastructure is already at its maximum capacity (Covid excepting), so the additional proposed housing will only make this unbearable for existing residents and road users. The A4 is often clogged with traffic at peak times of the day or when works occur on the A4 in the area, which is often. Traffic grinds to a complete halt and there is an increase in air pollution as a result. This has a detrimental affect on existing residents and businesses on or near the A4 too, as the buildings already shake with the volume of traffic and joining/ leaving the A4 can take a ridiculous amount of time.</p> <p>The schools and class sizes are already large and at capacity, so surely there won't be room for additional pupils!! The local hospital, GP surgeries, fire service and the like will be pushed to the limit.</p> <p>The green spaces, which West Berkshire can boast, will be eroded so much, that it will no longer be a healthy place to live, and wildlife that comes to the area will steadily be pushed out. The existing housing developments have very small, if any garden space, so in terms of the negative environment impact and the impact on mental health, I believe out ways the need to expand the area on such a massive scale.</p> <p>I stress that it will be the WRONG thing to do.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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		<p>modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thattham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thattham to the AONB.’</p>
<p>Amanda Glover (lpr1121)</p>	<p>Please could you take into consideration my objections</p> <ol style="list-style-type: none"> <li>1. Once the land is built on, it is unlikely to be turned back to the countryside.</li> <li>2. Natural habitats will be destroyed</li> <li>3. City expands resulting in an increase of pollution</li> <li>4. While brownfield sites are more expensive to develop, by regenerating those areas you will solve other social issues at the same time</li> </ol>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>At a time where we are trying to protect the climate I really hope that all development is done with the environment at the heart of every decision.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the</p>

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		<p>plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Nicola Jones (lpr1133)	<p>Please find attached a document containing our thoughts on the proposed NE Thatcham development (THA20) within the draft Local Plan review to 2037.</p> <p>This notes alternatives/points of consideration in supporting other options to include in the Local Plan together with our concerns in respect to the proposal.</p> <p>Please confirm receipt and that you can view the contents of the document.</p> <p><b>Attachment entitled "THA20 considerations":</b></p> <p><b>Alternative Considerations to THA20:</b></p> <ol style="list-style-type: none"> <li>1. Is WBC houses per annum target still appropriate given the recent AWE findings reducing viability of available land &amp; the scale of AONB, etc.</li> <li>2. Mitigations could be found to cater for the AWE findings and change to DEPZ (relating to a change in the model for weather criteria only) rather than preclude development for Grazeley. Reading were reported to still consider it viable but could not proceed if WBC &amp; Wokingham withdrew support. It seems it is more about economics. <ol style="list-style-type: none"> <li>1. the facilities could review mitigations they could put in place, urgent protection shelters or other things developers could put in place</li> <li>2. after all there are already many people living in the areas who need to be protected so it does not mean new residents cannot be protected &amp; THA14 is in outer zone</li> </ol> </li> <li>3. The Sandford issues are resolvable – it is not very reasonable to just take it out of the plan and move it to this site. Consortiums can also</li> </ol>	<p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing</p>

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	<p>break up/disagree on how to satisfy WBC planning needs so a similar risk.</p> <ol style="list-style-type: none"> <li>4. Redevelopment of brownfield sites &amp; where businesses close is a priority, including in town centres where shops are closing, why not THA1.</li> <li>5. There is time to still put in place a plan with more options so not just really only THA20 and remove the 'threat' of developers going direct to government</li> <li>6. CA12 is considered disconnected.....not clear why this is unsuitable with infrastructure</li> <li>7. THA14 is not adjacent to the settlement boundary – it would only be via creation of this site</li> <li>8. Is this site trying to find house volumes allocated to other districts who haven't found sites</li> <li>9. Would expect to see more detailed assessments undertaken or a plan to do so for other sites offered. <ol style="list-style-type: none"> <li>1. It appears these have been dismissed without similar level of consideration</li> <li>2. A continued requirement in future will presumably lead to no choice but to develop on AONB &amp; flood plain so why not considered in this plan.</li> <li>3. Building houses on flood plains or on lakes/water ways is more advanced than in previous years, and it is quite possible according to architects to protect the areas developed together with not causing flood issues further along to other areas – it may not be as cost effective for developers to build in WBC due to the constraints but this needs to be accepted if we are to build here, and other areas of UK/countries seem to manage ok e.g. Norfolk, Netherlands.</li> </ol> </li> <li>10. Whilst 40% affordable housing may be the desired outcome, this is normally distributed across many developments in different locations giving residents wishing to live in such housing varied location options. However, 40% of 2500 houses risks putting a disproportionate volume of the county's overall number in real terms in one location</li> </ol>	<p>planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p>

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	<p>11. Is the current housing stock actually all lived in as opposed to sold/owned - seems a lot of apartments remain empty in Newbury and Reading (they may be owned by developers but not actually lived in).</p> <p>12. Would a different site attract Government Garden Town funding</p> <p>13. Why not build a self-contained new village (or several smaller ones) in an area of AONB with less impact and benefits to the community there (as not close to other settlements? Or self-contained village with access to Green Park / along M4 corridor rather than over urbanisation and pressure on Thatcham and existing settlements.</p> <p>1. would be terrible to build in THA20, only to find new owners of Bucklebury Farm Park also want to build thousands of houses (which could be hidden within trees)</p> <p>14. There is limited employment in this area (and despite stating it is adjacent to Colthrop Ind estate, which it isn't, there are no jobs for 2500 households there)</p> <p>1. Houses will only benefit businesses elsewhere though WFH or commuting.</p> <p>15. What evidence is there that building houses will lead to regeneration of the Town Centre, local economy and creation of a market town</p> <p>1. There are many examples of other towns where large estates have been built yet the town centre continues to degenerate, residents commute away for work, shop in larger towns (such as would occur here in Reading and Newbury and beyond) and now we see huge increase in online shopping so how will the local economy in reality be improved.</p> <p>16. The railway network at Thatcham is being stated as a positive to build here, whilst this infrastructure is not sufficient nor easily upgraded, trains are expensive and not frequent enough or lengthy in duration and limited going elsewhere as not a main line from Thatcham so not making routes as viable as those from Reading Green Park or Newbury (as a traveller I experience this)</p> <p>17. Whilst previously the settlement boundary of Thatcham and stated over - development were a restriction for development, now it is suddenly acceptable with very little change in the circumstances of</p>	<p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>

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	<p>Thattham/surrounding villages (except as bi-product of AWE review) so reasoning for the change is lacking.</p> <p>18. Why is it acceptable to build so close to Upper Bucklebury (“UB”) whilst avoiding building close to other villages near Thattham or between Newbury and Thattham where there seems to be further quite large areas of land and infrastructure maybe more easily upgraded.</p> <p>19. Is there not already the financial schemes in place for WBC to fund infrastructure including with contribution from developers without the need to compromise with having to agree to overly large sites (small sites also deliver funds for this as do other sources of funding)</p> <p>20. Is the proposal in line with all policies</p> <p>21. The developers appear to have proposed 1791 - 2316 houses whilst WBC are suggesting 2500 seemingly to give more profits to cover part funding the infrastructure – the economics before this looked extremely healthy for the developers so why are further houses/profits required to neutralise this part investment. The developers would have already built in a contingency in the house numbers and economics proposed to allow for negotiation so it is highly likely they would agree to much less houses than 200 and still include the funding contribution and more green space without WBC needing to agree to increased housing to be built on this site.</p> <p>22. Will Bucklebury Parish Council receive more funding to cover the increased maintenance due to consequences of this influx of people.</p> <p>23. How can limitations be guaranteed on further development within this site (losing green space), and in nearby areas to this site (eg. THA16 &amp; 17 &amp; BUCK2) once the gate is opened to changing these settlement boundaries.</p> <p>24. Is the plan with a site of this size for only a few large developers/land owners, favouring those over smaller developers who may not have access to the same level of resources to compete with them.</p> <p>25. Is there any conflict of interest where WBC has utilised research/data undertaken by these developers to make their assessments (they have campaigned significantly to overturn/change policies and influence the outcomes simply because this is where they have bought land – if it was somewhere else they would be campaigning for it there).</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the</p>



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	<p>26. Can leverage (without commitment outside of due process) be gained to reduce this site as the developers may also have other sites of interest which could be viable so win-win.</p> <p>Concerns to be considered/addressed in the plan for THA20:</p> <ul style="list-style-type: none"> <li>• Sheer scale of the housing development is disproportionate and does not conserve or enhance the landscape character of the area or conserve &amp; enhance AONB <ul style="list-style-type: none"> <li>○ Building on slopes is contrary to the rest of Thatcham, setting a precedent and leading to loss of greenfield space and feeling of countryside, risk to the views</li> <li>○ If other sites were also considered in the plan then reduced development along the main road in the valley could be a compromise</li> <li>○ THA14 could be committed as complete country park with the school by the crematorium and no building further up the slope than the crematorium rather than 800 /970 houses going right up to the woodland in areas or up the slope above Colthrop Manor as is proposed (the 100m max is still too high)</li> <li>○ Development is over an excessive period of time over (this is incomparable to other recent developments).</li> <li>○ 1250 houses by 2037, with a further 1250 beyond leading to 20+ years of building</li> <li>○ The photos in the stage 3 review are misleading as to the countryside sloping landscape as the view is cross ways from the bottom, rather than up/down the slopes</li> <li>○ The footpaths currently in the fields ought to remain in green space and not sandwiched between buildings as is proposed which completely destroys the character of a countryside walk and ability to walk dogs off the lead</li> <li>○ The country park requires as protected status &amp; not be potential amenity green space.</li> <li>○ Adverse impact to AONB and ancient woodland due to the proximity, suggested 25m buffer is insufficient</li> </ul> </li> </ul>	<p>parameters of the site, height parameters, green open space, etc.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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	<ul style="list-style-type: none"> <li>○ Adverse impact on wildlife, native deer, red kite, small animals etc. which all call this area home and will be displaced</li> <li>○ Not in line with brownfield development objectives, including changing this from agriculture/green to residential use which is contrary to objectives.</li> <li>● Upper Bucklebury (“UB”) impacts contrary to WBC stated objectives <ul style="list-style-type: none"> <li>○ Development, even with a guaranteed country park, is very close to UB destroying the rural access to UB and the distinctive village identity and character</li> <li>○ Leading to coalesced with Thatcham</li> <li>○ Could detrimentally impact UB economy by use of shops in the new development or of UB amenities over usage due to influx of Thatcham residents</li> <li>○ Adverse impact on Long Grove which is a public right of way but it seems only the residents are funding the upkeep of the road. Increased volumes of footfall and cycles during the lockdowns has already been experienced leading to litter, dog poop, security concerns and damage to the road surface, which will only increase. Rather than this route being promoted in this plan as a route for thousands of people to use from the ‘new country park benefiting the whole town’ it ought to be gated for residents use only and the alternative public rights of ways already on this site be promoted. This will seriously impact existing Long Grove residents and their financial outlays.</li> <li>○ Safety impact to existing UB residents due to additional people included in THA14 within the AWE outer zone</li> <li>○ Adverse impact to mental and physical health (and happiness survey) of nearby residents in Thatcham and in UB due to the size and prolonged period of disruption <ul style="list-style-type: none"> <li>▪ Noise, air quality &amp; dust particulate pollution, vibration, light pollution and destruction of the reasons for living in a peaceful, clean air,</li> </ul> </li> </ul> </li> </ul>	<p>Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p>

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	<p>unpopulated AONB during the building phase and beyond once built.</p> <ul style="list-style-type: none"> <li>▪ Compensation isn't considered nor guarantees to limit pockets of time for development work allowing long periods in-between of no building activity.</li> <li>○ Traffic up Harts Hill, Cox lane and through UB and other villages will be increased unless restricted to limit non-UB residents – the study has incomplete/inaccurate estimations, the villages are rural with rural infrastructure and already experiencing inappropriate volumes not related to the villages and are rat runs towards M4 (E &amp; W) &amp; Reading with speeding and other safety and pollution issues.</li> <li>○ Risk of impact on water pressure to UB – for some households remains insufficient despite recent improvements so this is a concern with more homes to cater for</li> <li>○ Safety concerns for walkers &amp; cyclists up Harts Hill &amp; Cox Lane</li> <li>○ Potential adverse impact on Bucklebury Common due to increased users</li> <li>• Thatcham <ul style="list-style-type: none"> <li>○ Cannot see how 25% expansion of Thatcham will create a market town or fuel local economy, regenerate town centre or provide jobs</li> <li>○ See some of UB impacts above as also relevant to Thatcham</li> </ul> </li> <li>• General <ul style="list-style-type: none"> <li>○ Risk of relaxation of the plan intentions &amp; any positives proposed/commitments used now to secure the site in this plan, risk of further development, etc. once in the planning process and of over-use of permitted development rights once built.</li> <li>○ There is limited detail on how biodiversity, historical, archaeological, minerals etc. are to be protected</li> </ul> </li> </ul>	

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	<ul style="list-style-type: none"> <li>○ Increased pressure on infrastructure due to poor timing of upgrading/building new due to being sacrificed in lieu of economics for the developers, whilst in reality their business models expect a long period for ROI</li> <li>○ Traffic improvements to A4 would be required and consideration both west and eastbound – traffic into Newbury and up through Cold Ash is already extensive</li> <li>○ Insufficient provision for employment, incubation &amp; accelerator hubs etc. given the changing employment profile &amp; working from home trends.</li> <li>○ Appears to be a lack of healthcare provision if existing Thatcham practices are at capacity</li> <li>○ Limited community &amp; cultural provision despite the scale – church, pub, restaurants, cinema, theatre, library etc.</li> <li>○ Mix of housing and groups catered for aligned to the type of resident &amp; affluence of who will live here - including the elderly &amp; disabilities given the aging population – in NL there are ‘villages for the elderly / dementia with shops to maintain independence rather than be in a care home) and pricing levels are unknown</li> <li>○ Are equestrian needs met</li> <li>○ Lacking details on water run-off from development, net zero carbon etc.</li> <li>○ Parking allocation by house occupancy is generally underestimated in developments (especially as children grow up and stay living with parents longer) leading to cars parked everywhere on streets causing safety issues and unsightly streets so more space for this ought to be allocated without impacting green space volume.</li> <li>○ Use of Henwick sports fields would be advantageous but this volume of space (as well as gardens, street trees/verges, allotments and other non-open natural spaces open to all of the public and not limited to users of the school/ householders etc.) should not be misleadingly referred to as green space – the 50% being discussed is in</li> </ul>	

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	<p>people's minds the country park whilst in reality this is only proposed at 32%</p>	
<p>Tim Cooper (lpr1127)</p>	<p>Please consider the following objections in relation to the proposed development of 2500 houses on the north side of Thatcham:</p> <ul style="list-style-type: none"> <li>- Working patterns have seen a massive change by the impact of C-19 and many people successfully working from home. With new ways of working, employers (NHS &amp; private sector) are now hiring staff out of the area, with no future expectation for commuting to a traditional office.</li> <li>- The new working/home employment pattern will also significantly impact commercial office space. This will create new brown-field sites and the opportunity to redevelop for the 21st century.</li> <li>- Once green-belt land is lost, it will be a grave mistake, and it's likely it'll never be recovered.</li> </ul> <p>Based on these fundamental shifts, the proposed plan should be shelved, and the new opportunities above embraced.</p> <p>These changes will impact much wider than West Berkshire, as it should help balance the employment and housing bias away from southern counties. These changes should be strongly verbalised and recognised at a national level.</p> <p>Looking forward to a responsible outcome for this planning proposal.</p>	<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>

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David Gatenby (lpr1129)	<p>I'm writing regarding the NE Thatcham Development of 2500 homes you are proposing as part of the Local Plan Review 2020 -2037 and wish to notify you of my objection to this proposal.</p> <p>Before I detail the reasons for my objection, I must express my surprise that residents have only until the 5th February to respond to this consultation. As this period is during a National Lockdown it obviously adversely impacts on the ability of residents to co ordinate themselves if they wish to object to this proposal. It has also resulted in many residents not even being aware of the proposal. One wonders if this is deliberate?</p> <p>The main reasons for my objection to the proposal are as follows -</p> <p>TRAFFIC</p> <p>The road infrastructure in this area already struggles to cope with existing levels of traffic. The proposed development of an additional 2500 houses would clearly over burden this system.</p> <p>In particular, I understand that the traffic forecasting already anticipates a proportion of the traffic generated by the development will pass up Harts Hill Road into Bucklebury Parish in order to access the A34 and M4. This would have a major impact on numerous surrounding villages including Upper Bucklebury and Cold Ash in the following ways.</p> <p>* Many of the roads along here have no footpaths or cycle ways, which are already hazardous for pedestrians and cyclists.</p> <p>* The significant increase in traffic would create a vastly increased safety concern for residents, particularly school children walking to and from school.</p>	<p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that “We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government’s aspirations to have plans in place across the country by 2023.”</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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	<p>* Roads throughout Bucklebury Parish are inadequate and not designed to cope with increased volumes and speed of traffic that this proposal would create.</p> <p>* The increased volume of traffic will adversely impact the quality of life for residents of the villages through increased traffic disturbance.</p> <p>* Harts Hill Road is a steep hill with numerous blind bends, all of which are narrow and unlit. It is not suitable for large volumes of traffic.</p> <p>Whilst I have focussed on the impact on my local area, this does not take into account the impact on other areas that are already struggling to cope with existing traffic levels including the A4 and the Thatcham Station area. Clearly the huge increase in traffic generated by an additional 2500 homes would be too much for these areas to cope with.</p> <p>PROXIMITY TO AONB</p> <p>Bucklebury Common is already experiencing an increase in visitors, resulting in increased 4x4 and motorbike disturbance and damage, littering, dog fouling etc. This has obviously resulted in damage to the natural environment. The impact of this development of an additional 2500 houses adjacent to the Common would be severely detrimental to this area of outstanding natural beauty.</p> <p>Whilst I am aware that there is a need to provide additional housing in the future, I believe that the scale of development is too much for this area to cope with in a single location.</p> <p>Instead of concentrating all of these homes in one location, perhaps a more diversified approach could be taken with the 2500 homes being spread across additional sights in West Berkshire rather than over developing one area.</p>	<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>

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	<p>PROXIMITY TO AONB</p> <p>Instead of concentrating all of these homes in one location, perhaps a more diversified approach could be taken with the 2500 homes being spread across additional sights in West Berkshire rather than over developing one area.</p>	<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Caroline Head (lpr1130)	<p>I wish to object to the planned development of 2500 houses between Bucklebury and the A4 and Floral way.</p> <p>As well as this being a huge over development as far as number of houses, resulting in a massive loss of green space for current Thatcham and Bucklebury residents, I am very concerned about the impact this development will have on traffic with lorries destroying the already pot holed country roads towards Bucklebury School &lt;personal information removed&gt;.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>



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		<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
<p>Rebecca Hannam (lpr1132)</p>	<p>I would like to put forward my objection to the proposal to build 2,500 houses on land to the north east of Thatcham, I have lived in Bucklebury and Upper Bucklebury all my life. I fear this build will lead to Upper Bucklebury losing its identity as a rural village and become a part of north Thatcham. The loss of a green belt between Thatcham and Upper Bucklebury cannot be denied.</p> <p>I understand that more housing is required but I believe that due to the changing nature of how the public work and shop with people working from home and large retailers closing ie, Debenhams and Top shop, many buildings within towns are empty and could be converted to housing. Green</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are</p>

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	<p>spaces are becoming more important for wildlife, mental health and exercise.</p> <p>The effect of more traffic through the village will have a detrimental impact on already busy country lanes and will lead to more pollution and litter. I believe we need to actively keep our rural villages rural, or risk losing an unreplaceable part of English country life.</p>	<p>only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the</p>

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		IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Jane Rowe (lpr1131)	<p>I am writing to object to the proposed development of 2,500 houses to the north east of Thattham for the following reasons:</p> <ol style="list-style-type: none"> <li>1. There seems to have been little, if any, consultation with the local community - the first I heard about it was when a petition arrived in my inbox in late December and subsequently nothing until the local community in Upper Bucklebury became fully aware of the implications at the beginning of January 2021</li> <li>2. This is a huge increase in the acreage of Thattham which seems to have grown significantly since the 1950s. <ul style="list-style-type: none"> <li>o The town centre (which seems to be in decline) and amenities do not appear to have kept up with the growth over the last 70 years despite the most recent increase of 800 dwellings on the old Ordnance Survey Depot near the station, some 15 years ago, and other smaller developments</li> </ul> </li> <li>3. What supporting evidence is there for such a large development since the start of the Pandemic, with the likelihood of people continuing to work from home in the future, and since leaving the EU? <ul style="list-style-type: none"> <li>o There are many shops and businesses in the area which have closed, without much hope of being replaced and, similarly, with more people working from home office space will be reducing in size or closing.</li> </ul> </li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

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	<ul style="list-style-type: none"> <li>○ Surely it would be more effective to increase town centre dwelling to revitalise Thatcham and Newbury by converting these buildings</li> </ul> <ol style="list-style-type: none"> <li>4. The proposed development appears to be outside the Local Plan and beyond Floral Way which I believe is the settlement boundary protecting villages such as Upper Bucklebury and Cold Ash, which will effectively be part of Thatcham removing the rural aspect of these villages</li> <li>5. It will impact on Bucklebury Common - parking, wildlife, maintenance of paths and a significant increase in footfall which has already risen during the Coronavirus Pandemic</li> <li>6. Increase traffic congestion (and pollution) on A4 in Thatcham which is currently considerable at certain times of the day</li> <li>7. Impact on traffic (and air pollution) going through local villages, such as Upper Bucklebury, Chapel Row and Bradfield, which is a rat run to Reading/M4 east as well as to the M4 west via Cold Ash/Hermitage, impeding the safety of pedestrians including many children embarking/disembarking from school buses and walking to/from school.</li> <li>8. Which in turn will affect the Quiet Lanes in the area, particularly in Upper Bucklebury where they are used to avoid congestion in Broad Lane during peak periods - cars driving along the Quiet Lanes far too fast without any respect for pedestrians walking to school or elsewhere</li> <li>9. In addition to the provision of new schools there will be a need for more healthcare, policing, leisure facilities, road improvements, shopping facilities such as supermarkets and so on.</li> <li>10. Will the new secondary school replace Kennet or complement it?</li> <li>11. Is the Thatcham surface water management plan going to protect new and existing residential and industrial areas from future flooding and how will the Sewage Works cope with waste from such a large development including the stench that emanates from the site in Lower Way?</li> </ol>	<p>infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the</p>

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	<p>Whilst I understand there is a need for housing in West Berkshire, I believe this huge project is totally unacceptable.</p>	<p>government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>

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		<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a</p>

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		<p>'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p>
Joanna Cooke (lpr1153)	<p>I am writing to give feedback for the NE Thatcham development of 2500 homes that you are proposing as part of the Local Plan Review 2020-2037 Emerging Draft December 2020 document.</p> <p>Please consider this email an <b><u>OBJECTION</u></b> to this development, for the reasons listed below:</p> <ol style="list-style-type: none"> <li>1. The proposal does not contain the provision of healthcare or medical facilities for these 2500 homes.</li> <li>2. The proposal does not address the question of how Thatcham train station will cope with increased demand.</li> </ol> <p>- Parking facilities in particular are inadequate for even current demand, and so there would need to be a significant increase in this, to cope with increased demand.</p> <p>- The level crossing at Thatcham station frequently has extremely long queues of traffic waiting to cross the train line. The proposal does not address how the increase in queues of traffic in this area will be managed.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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	<p>3. As well as the road at the Thatcham level crossing being insufficient to cope with increased demand, there are other areas near the proposed development which are also not adequate for increased local traffic.</p> <ul style="list-style-type: none"> <li>- Increased traffic will have a significant negative effect on many of the surrounding villages including Upper Bucklebury, Chapel Row, Cold Ash and Bradfield. These roads already suffer with many incidents of speeding, as confirmed by Bucklebury Parish Council SIPS.</li> <li>- Increased traffic will be a safety concern for many residents, particularly the elderly and those with young children.</li> <li>- A number of the roads in these areas do not have a footpath. For example, The Ridge in Cold Ash, Burdens Heath in Upper Bucklebury and Harts Hill Road leading to Upper Bucklebury. Increased traffic will make these roads significantly more dangerous for pedestrians and the people who already live there.</li> <li>- Increased traffic will mean increased noise and disturbance, affecting the quality of life for the village residents.</li> </ul> <p>4. The proposed development is extremely close to the North Wessex Downs AONB and will therefore negatively affect this area. The proposed development will mean a loss of the open aspect of the area, and loss of existing countryside views particularly for those residences on the lower half of Harts Hill Road.</p> <p>5. The North Wessex Downs AONB already suffers with:</p> <ul style="list-style-type: none"> <li>- issues regarding the dumping of waste and fly tipping, which will only be made worse by the close proximity of such a large development.</li> </ul>	<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan'</p>



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	<p>- illegal use of motorised vehicles, which will also be exacerbated by the development.</p> <p>6. A development of this size will also have a significant detrimental impact on the local wildlife</p>	<p>/ visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Marie Ostovar (lpr1137)	<p>I am extremely concerned about the proposed 2,500 houses for Thatcham to be built on farmland between Upper Bucklebury and the A4 and Floral Way. This is a huge over development, which will entail the loss of rural countryside and the loss of Thatcham Green Belt, to say nothing of the impact of increased traffic and pollution at <b>a critical time for the environment when we are supposed to be protecting it!</b></p> <p>I have chosen to live in Upper Bucklebury for the peace and beauty of the countryside but I can envision a future scenario when traffic will surge through my village in an attempt to avoid congestion on the A4, especially were there to be closures of the M4, with traffic diverted through Thatcham. Already GP capacity in Thatcham is under pressure and the proposed new houses will lead to demands for new schools to be built, again increasing traffic, with the adverse effect on air quality .Moreover, I am unsure that the current Thatcham surface water management plan will be sufficient to cope with the proposed increase in housing. No-one locally has forgotten the trauma of the 2007 floods in the town!</p> <p>All things considered, I am appalled by this terrible plan and the lack of public consultation. <b>It should be refused.</b></p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA</p>

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		<p>report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
<p>Alan Gibbons (lpr1138)</p>	<p>I would like to register my strong objection to this planned development. It would be an incursion into, and the loss of, rural countryside and increased urban spread, effectively joining Upper Bucklebury to Thatcham.</p> <p>Bucklebury Common is an area of Outstanding Natural Beauty and this development and the increase in nearby population and traffic would greatly harm such a rare and exceptional rural area.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Sue and Alan Whitmore (lpr1139)	<p>We write to object to the proposal to build 2,500 houses on farm land between Upper Bucklebury and the A4 and Floral way in Thatcham.</p> <p>The size of this proposed development is certainly an over development of the land in question. To add a further 25% of housing (which could well be an extra 10,000 people) to a small market town like Thatcham will completely change the way of life for its current residents, and not for the better. There is mention of new schools, sports facilities and shops being built but that alone will not provide all the facilities that these extra 10,000 people will require, such as doctor's surgeries, refuse collection, libraries, to mention but a few. Improved travel routes were also mentioned which would be very necessary. There are currently a number of traffic concerns in the area including the level crossing at Thatcham station. This already causes many traffic jams without being exacerbated by additional housing. All this extra traffic would also create a harmful increase in pollution.</p> <p>The proposed development would all but join Upper Bucklebury, which at the moment is a peaceful rural village, to Thatcham. Upper Bucklebury is within the North Wessex Downs Area of Outstanding Natural Beauty. The addition of another 10,000 people right on our doorstep would undoubtedly have a damaging effect on this beautiful countryside and will erode the Thatcham</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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	<p>green belt. There would be an enormous increase in traffic and Upper Bucklebury would suffer badly from the additional traffic using the route through the village as a 'rat run'. Despite a 30-mile an hour speed limit and road restrictions through Upper Bucklebury, there are currently on-going problems with cars speeding and the consequent dangers that this creates.</p> <p>We are aware that the country needs more housing but a development on the scale proposed is not the answer and would be very detrimental all round.</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Duncan Maclean (lpr1140)	<p>I would like to register my concerns as follows:</p> <p>- Having lived in &lt;personal information removed&gt; for over 30 years I have noticed the dramatic increase in traffic using the route through Upper Bucklebury - Bradfield Southend. This has been associated with the earlier developments north of the A 4 in particular. The new plan estimates an increase of 12 percent. From my experience this is a gross underestimate-which we should not accept as fact.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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	<p>- Harts Hill is a dangerous stretch of road - unsuitable for increasing volume.</p> <p>- Our local surgery has accepted increased numbers of patients from outside Bucklebury and is now at full stretch. There is a lack of capacity in the area and this should be addressed before the development - not after when the existing provision has been overwhelmed.</p> <p>- Local schools are oversubscribed (eg Kennet) - another issue which needs action before development.</p> <p>In conclusion I strongly suggest that our infrastructure and services require improvement to accommodate the large amount of development which has already taken place. Only then should we be considering further development.</p>	<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
June Maclean lpr1141	<p>As a long time resident of &lt;personal information removed&gt; I am to say the very least very alarmed at the proposed new development. I strongly believe the council should take a good hard look at the whole thing and what it will mean for the whole area over the next twenty to thirty years. It is going to have major implications for future generations not just of the people living in and around Bucklebury but of the wild life and the natural habit of the area. We are a rural area and even now in lockdown the volume of traffic on</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more</p>

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	<p>the road from Thatcham through to Bradfield and beyond is quite astounding! Our green belt must be protected at all costs.</p> <p>Thatcham has had more than its fair share of development over the past thirty years. Even now the community does not have all that is needed to support its current needs let alone think about imposing such a huge development even although it will be spread over two or perhaps three decades.</p> <p>If West Berkshire Council cannot guarantee the provision of:</p> <ul style="list-style-type: none"> <li>- new bridge over railway line - absolutely essential!</li> <li>- upgraded car parking facility at station</li> <li>- new medical centre</li> <li>- new secondary school &amp; primary schools &amp; nurseries</li> <li>- community centre</li> <li>- road infrastructure from Thatcham through Bradfield to Reading</li> </ul> <p>it should not go ahead.</p> <p>Dare I ask has there been a study done as to what the residents of these estates will earn their living? I presume not but I think it is a fair question. As we move forward I do hope the council as well as looking to bring more people into the area is equally looking to attract more 'industry' to ensure all who come will have secure employment for themselves and their families in years to come.</p>	<p>housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys</p>

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		from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Peter Walker (lpr1143)	I have just been made aware of the intention to build 2,500 houses on the farmland between Upper Bucklebury, the A4 and Floral Way. Whilst I appreciate the need for new housing I am concerned that this proposal will result in the over development of what is a rural area with a detrimental impact on the local community. I would also wish to be reassured that, should this development go ahead, additional infrastructure will be paid for by the developers so that the resultant increase in population, of perhaps up to 10,000 people, has new medical and dental facilities, as well as provision of school places, to meet the additional demands that would result.	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the</p>

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		LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Georgina Woods (lpr1144)	<p>I am writing to let you know my concerns about the proposed housing development in Thatcham.</p> <p>It seems to be a very large number of houses for the area and I am worried about the impact it will have on the traffic which is already very heavily congested at certain times, especially along the A4 and around the level crossing. I fear that the roads around Upper Bucklebury and Bucklebury will become rat runs to escape the A4. They are small roads with many bends and are used a lot by cyclists, horse riders and walkers and any increase in traffic would be very detrimental.</p> <p>The proposed development is also very close to an AONB which would be affected by the extra lighting at night and an increased footfall.</p> <p>Aside from these worries, I am also concerned about the lack of public transport, medical facilities and schools.</p> <p>I urge you not to go ahead with the proposed development.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has</p>



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		<p>undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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Wendy and Robin Jury (lpr1152)	<p>I am writing to object to the application to build 2500 house on the farmland between Upper Bucklebury and the A4 and Floral Way.</p> <p>My reasons are:</p> <ol style="list-style-type: none"> <li>1) Our doctors, dentist and schools could not cope with the volume of people as they are struggling already.</li> <li>2) Pollution with all the extra traffic on the village roads and also the damage to the roads with all the heavy traffic.</li> <li>3) Over development and loss of rural countryside.</li> <li>4) What damage and effect would it do to the wildlife.</li> <li>5) Loss of Thatcham Green Belt</li> </ol>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that</p>

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		<p>whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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		<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>
Sarah Beeson (lpr1158)	<p><u>– A personal view from a resident living in</u> &lt;personal information removed&gt;</p> <p>Upper Bucklebury is a small rural village with its own identity and a strong sense of community. We have some 250 dwellings in the village, together with a hall, pub, church, primary school, and shop, all connected by a central road. The number and speed of cars traveling along this central road is already an issue despite the current traffic calming scheme and this road is known as a local “rat run” between Thatcham and Theale.</p> <p>Over the years, Bucklebury Parish Council has put significant effort into the Bucklebury Vision planning document to help steer development within the Parish along carefully considered traditional lines and in keeping with the views of residents developed over many years. Even though we are close to Thatcham, up to now we have managed to maintain our rural outlook, our individuality, our common, open spaces, footpaths, bridleways, and byways, as well as to live in balance with local wildlife and livestock. We have had several smaller housing developments within the village over the years and on each occasion the housing has been in keeping with the local vision and the village has been pleased to welcome the new residents and integrate them into our community.</p> <p>With the current lockdown there has been a noticeable decrease in noise and traffic coming through the village, particularly during rush hour periods,</p>	<p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

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	<p>and a substantial increase in walkers on our footpaths and byways. Walkers' vehicles left inconsiderately parked on the sides of roads, litter, dog fouling and incidents of dogs worrying livestock have all significantly increased.</p> <p>Any new housing development affecting the village needs to be both sustainable and responsible. A close by development ten times the size of the village completely at variance to the local vision for the parish would be neither. This town extension would alter the very essence of our community, exacerbate the negative changes noticed during the lockdown, and may well bring about radical unexpected consequences such as the closure of our village school. The traffic modelling undertaken by West Berkshire Council indicates that 12% to 22% of the traffic from such a new development will travel through the village. This equates to thousands of extra cars every day adding to the noise and pollution in the village as well as to the danger to children being encouraged to walk, cycle or scoot to the local school. In addition, many residents from the new development will doubtlessly drive up the hill to walk, use the village facilities, and generally enjoy the area, thereby increasing the number of cars trying to park, the litter, the irresponsible dog fouling, the fly tipping on the common, and the pressure on our footpaths. Our problems with 4 x 4's on the common will only increase, and I fear for our wildlife and biodiversity which, worryingly, do not seem to get the strategic planning considerations they deserve. Upper Bucklebury will be closer to the new development than the centre of Thatcham!</p> <p>There has always been an understanding that there would be a strategic gap between Thatcham and Upper Bucklebury and that Floral Way would mark the northern boundary to Thatcham. This proposed development sends a coach and horses through this principle and opens the door to further development north of Thatcham at later date.</p> <p>I understand that families want to come to live in this beautiful part of the country. We moved here for the same reason but is North Thatcham the best place for such a development and is a single development of such a size really the best solution? The world has changed since the current pandemic and Brexit. The small rows of shops and the general proposed</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against</p>

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	<p>layout of this development may be as outdated as the old corner shop by the time this is built. Where are people from this development going to go to do their weekly shop? This development is far from the centre of Thatcham and far from the train station, such that travel to either would doubtlessly be predominately by car. Surely a large new Thatcham development, if needed at all, should be maximising on Thatcham's rail connection, concentrating on the cycling, and walking links provided by the canal, and homing in on the existing safe cycle and walking corridors to the centre of Thatcham and to Thatcham's other jewels such as the Discovery Centre. Climate change and energy efficiency considerations should highlight the need to produce new housing that is not completely dependent on the car.</p> <p>This proposed development, being on a hill site, will overshadow existing Thatcham housing in the area, provide extensive problems relating to runoff and flooding, cause significant traffic problems, and bring no benefit to the wider town.</p> <p>Wouldn't be better to go back to the drawing board now, reconsider what is needed in this new world we find ourselves in, and re-plan for the housing and the associated infrastructure needed in places and of a nature to serve future generations with the smallest impact on our planet?</p> <p>For the sake of my village, our community, our children, our wildlife, and our biodiversity, I strongly object to this proposed development.</p> <p>Wouldn't be better to go back to the drawing board now, reconsider what is needed in this new world we find ourselves in, and re-plan for the housing and the associated infrastructure needed in places and of a nature to serve future generations with the smallest impact on our planet?</p>	<p>substantially higher numbers than the housing need based on the standard methodology.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Michael Kefford (lpr1160)	I would like to object to the plan to build 2500 houses N East Thatcham just North of Floral Way and the A4.	The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual

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	<p>The reason for my objection is as follows:-</p> <ol style="list-style-type: none"> <li>1) It virtually joins Thatcham to the rural village of Upper Bucklebury.</li> <li>2) The plan is vast over development for a rural area.</li> <li>3) There will be a large loss of rural countryside which many people use for outdoor enjoyment and exercise.</li> <li>4) Thatcham will lose a lot of its green belt land.</li> <li>5) There will be a significant impact on traffic volumes in an area which already has busy roads. There will also be an impact on air pollution due to the extra volume of traffic.</li> </ol> <p>I would like you to take into account my objections along with any others you receive when you consider the plan.</p>	<p>and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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		<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>
Angela Blake (1154)	<p>I am emailing you today to object to the proposed development of 2500 homes for Thatcham. With regard to this (over)-development of Thatcham, I would like to add my major concerns to the many I know that you have received already.</p> <p>Obviously if this development goes ahead then Thatcham would, not only need, but would have to have a brand new secondary school. Will this be part of the plan? Despite living within a 30 minute walk of Kennet School, both of my granddaughters had to travel into Newbury everyday to attend Trinity School because of catchment issues and over-subscription issues. This was a ridiculous situation and will be compounded for Thatcham children if a new secondary school is not built alongside this development. In addition, clearly, we would need nursery, infant and junior schools as well!</p> <p>Obviously, once again, if this development goes ahead then Thatcham would, not only need, but would have to have a new Doctors' Surgery. Will this be part of the plan? Appointments at local surgeries are difficult to get</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>



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	<p>and the two surgeries we have now would not be able to cope with thousands of new patients.</p> <p>This proposed major over-development of the area will not have the sufficient infrastructure to go with it - they never do and promises of such are never kept because of lack of funding. In addition, the tranquillity of the Crematorium will be destroyed. I had thought that I might like to be laid to rest there eventually - but not if you are going to surround it with thousands of houses! There will be a huge loss of countryside and loss of wildlife in this greenbelt area and an increase in pollution.</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Sarah Darling (lpr1161)	<p>Wish to register my strong objection to the proposed development plan. Bucklebury is a rural parish and this over development will obviously result in a significant loss of some outstanding countryside, increase traffic pollution thus causing a significant reduction in air quality.</p>	<p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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Olivia and Michael Revell (lpr1162)	<p>We wish to object to the proposed plans on the basis of the following:</p> <ul style="list-style-type: none"> <li>• The size of development</li> <li>• Loss of Thatcham green belt land</li> <li>• Loss of rural countryside</li> <li>• Impact on local traffic</li> <li>• Impact on the environment</li> <li>• impact on local services and amenities including, Schools, Doctors, Hospitals etc</li> </ul>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
<p>Adrienne and Paul Clarke (lpr1163)</p>	<p>We wish to provide feedback on the proposed development at NE Thatcham which has been detailed in the December 2020 Emerging Draft of the Local Plan Review 2020-2037.</p> <p>We live at a 400 year old farm workers cottage which, currently surrounded by the farmland it served, would be surrounded by "urban density" housing if this proposal goes ahead and we would like to make the following observations.</p> <p><b><u>Suitability of the land for building</u></b></p> <p>The land proposed for development above Dunstan Park holds a huge amount of rainwater within it as I suspect does all the land proposed for development. The ability of this land to hold rainwater stops severe flooding in Thatcham on a regular basis. For this reason, part of the land was, in the review in 2013, marked as "Not Developable" due to surface water flooding risk (see attached). The flood defence basin has since been built (on land provided to the Council by the developer, unsurprisingly), but that will not be</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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	<p>sufficient if the land above it is developed and therefore cannot retain the water it currently does retain-which we have observed over many years before and after the flood defence basin was built and that water holding capacity by the land has not changed. This is acknowledged in this new plan, and a further lake is proposed, but it must be questioned whether that is sufficient, and development itself must be questioned if the plan has to work so hard to attempt to manage surface water. The flood risk to Thatcham of this proposal must be taken seriously and not brushed over in response to pressure from developers. The floods in Thatcham affected so many lives so adversely that it must not be allowed to happen again. You only need to acknowledge the geography of these hills above and leading down into the town to realise that this is a serious issue.</p> <p><b><u>Provision of local amenities</u></b></p> <p>The plan recognises a need for schools to be built, but not a doctors surgery. There was, pre-pandemic, a 3-4 week wait to see a GP for a non-urgent matter. The current local GPs could not take on any more patients, let alone the numbers in this new development. In 2019, the average number of registered patients per GP was 2087, so the development would need a new practice of 4-5 GPs plus nurses and admin staff. Even if a practice building was included there is a national shortage of GPs and nursing staff to work in it.</p> <p><b><u>Provision of infrastructure</u></b></p> <p>The current road system would not support the increased traffic, and although there may be an increase in home workers post pandemic, which the developers have conveniently latched onto in their proposal for "home/local working hubs", people will, in reality, need to commute to work as there are few local jobs.</p> <p><b><u>Ecology and Green Space</u></b></p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under</p>

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	<p>This is a proposal to develop a huge amount of untouched farmland currently designated for agricultural use which is OUTSIDE a residential curtilage. It is an important green divide between residential and industrial Thatcham and the North Wessex Downs AONB and the important habitats that are within and around it. The developers have the audacity to suggest that the development of this land would enhance the accessibility to green space for Thatcham residents. However, the proposed development land already has access via footpaths and byways, one can walk from Thatcham up to Bucklebury Common for recreation right now, enjoying the beautiful walks and views across this land that is in the proposal. Development offers NO enhancement to this facility, it simply removes it under development. Indeed if you added all the occupants of 2500 houses into the human footfall on Buckelbury Common, the rest of the AONB, and indeed the remaining green land proposed within the development, it would pose a severe threat to it's survival and sustainability of wildlife and flora.</p> <p>This proposal to transform pristine, beautiful, valued and enjoyed countryside, that is designated for agricultural use and has previously been at least partly defined as not developable to an urban environment is just wrong, and suitable alternatives for housing stock requirements need to be sought.</p> <p><b><u>Consideration of alternatives</u></b></p> <p>The need for extra housing stock is understood. However, this could be implemented with far less devastating detrimental impact on the environment and the quality of life of Thatcham and Bucklebury residents by dividing the density up into smaller, non co-located developments on land that is not pristine countryside. Consideration needs to be given seriously to re-purposing office and retail buildings that are left unneeded by the changes in the way we live modern life, as well as brown field and infill sites that are available</p>	<p>policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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		The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.
Zita Griffiths-Eyton (lpr1164)	<p>We moved to Upper Bucklebury from Newbury 3 years ago to live in a village and enjoy being part of a small community, in the centre of the countryside. Never would have thought that a development of this size could be built on our doorstep and could influence our life and our children's, possibly our grandchildren's. As you are proposing half of it to be built by 2037! I ask the question for how many generations are we to live next door to a development site and to put up with noise, traffic, industrial consequences of this development plan that seems to be born out of greed and stretched as far and as big as someone pointing a finger on the map could have stretched it without proper thought and the need behind it.</p> <p>I understand that some(!) houses need to be built and there is a demand but to build that many in that location is a recipe for disaster.</p> <p>The biggest problem is the sheer volume that scares everyone in the vicinity.</p> <p>The developers won't care about the people already living here, they won't care how much extra pressure they put on the existing schools, GP surgeries, dentists, pubs etc.</p> <p>Schools are mentioned in the development plan but would they be built before people actually move in, ready to take students? Where is the new surgery/ies to take all these families (3000-4000 people at least)?</p> <p>To come back to our village, Upper Bucklebury with a primary school and sadly already some speeding through the village, this development:</p>	<p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<ul style="list-style-type: none"> <li>• would create a massive extra traffic going through our village, increasing noise and pollution levels</li> <li>• traffic to Thatcham station is already chock a block</li> <li>• the boundaries of the new development are too close to Upper Bucklebury risking the village to sucked in by Thatcham</li> <li>• parking in Thatcham is already an issue</li> <li>• the volume and frequency of trains going through Thatcham station cannot cater for these proposed new residents</li> <li>• Who are these houses built for? Can the developers see 2500+ new job opportunities in the vicinity? The plan far outweighs the demand here</li> <li>• there is a proposed country park. We already have one in Bucklebury. What effect would this have on that one?</li> <li>• traffic: there are children at Bucklebury Primary School from Thatcham. Their school run would be hugely affected. Would they have to change school?</li> <li>• secondary school: Kennet School at Thatcham is already struggling with capacity. We are in the catchment area but so would these 2500 families have priority of getting a place over us as they will be built between us? Again when would the proposed secondary school be built and how it would affect current catchment areas?</li> </ul>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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Gill Auld (lpr1165)	<p>I must add my observations and objections to the above planned development.</p> <p>The whole development is far too large at this proximity to Upper Bucklebury.</p> <p>It is too close to the village, barely separating Thatcham town from the village of Upper Bucklebury.</p> <p>I recall a promise made a long time ago - 'that it would never be allowed' !</p> <p>The extra traffic will be added to what is already a significant burden for the villages of Upper Bucklebury, Chapel Row and Bradfield Southend.</p> <p>As well as the additional infrastructure required, the Thatcham Station could not cope with the extra cars needing to park.</p> <p>I have concluded that the whole Development is just far too much for this area, and hope there will be serious considerations given to the scheme.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>



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Robin London (lpr1167)	<p><b>RE: Proposal to Build up to 2,500 houses in N.E.Thatcham by 2036</b></p> <p>I am emailing you on behalf of my whole family regarding our concern and objection to the proposed development of 2,500 homes in N.E Thatcham.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for</p>

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	<p>Having lived in Upper Bucklebury for thirty-five years, the impact of such an enormous development will have a very negative effect to our community for the following reasons:</p> <ol style="list-style-type: none"> <li>1. <b>Traffic &amp; Transport:</b> The increase in population (2,500 homes) will cause considerable congestion on the A4 and Floral Way, leading to hazardous levels of traffic on Harts Hill and through Upper Bucklebury. Harts Hill is a dangerous, unlit, unpaved road and the increase in traffic will make it even more unsafe. As a community, we are deeply concerned that Upper Bucklebury will be used as a “rat run” to Reading and the M4.</li> <li>2. <b>Services &amp; Utilities:</b> We find it difficult to understand how the necessary and affordable services and utilities (gas, water, drainage, internet and mobile) can be successfully provided for these homes. Upper Bucklebury is already under pressure regarding these services and utilities.</li> <li>3. <b>Environmental &amp; Noise:</b> This development will also cause disturbing levels of environmental and noise pollution in the community and areas of natural beauty. The planned over development will see the Parish’s commitment to our rural conservation and protection of the environment impacted for residents now and for the future generations.</li> </ol> <p>We strongly object to these plans and urge West Berkshire Council to reconsider the need for such a large development of 2,500 homes in this location</p> <p>In summary, the consequence of this plan will have huge implications in all areas (traffic, services and environmental) for this community.</p>	<p>additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

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		<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Jane Carwardine (lpr1214)	<p>I wish to register my grave concerns about the proposed development for 2500 houses along the A4 between Floral Way and the Crematorium. The A4 is already incredibly busy and simply could not support another 2000+ additional cars. Local schools are full, as are doctors' surgeries. Also, there are very few facilities locally for school age children.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements</p>

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		<p>being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Simon Hannam (lpr1217)	<p>I am writing to object to the planned development Thatcham North East for 2,500 homes.</p> <p>My objections are</p> <ol style="list-style-type: none"> <li>1. The Thatcham Green Belt and should remain protected for the benefit of all existing residents for recreation and mental well being.</li> <li>2. Loss of high quality agricultural land and urge you to seek a brown field site which cannot be used for food production.</li> <li>3. The loss of our natural open countryside views would be lost forever to the detriment of us and our future generations</li> <li>4. The infrastructure cannot take more traffic, more sewage, more light pollution, more flooding and six years of construction traffic on our narrow congested lanes.</li> <li>5. The geology of the proposed development has presented major problems to Thames Water and their water supplies. My expectations is the development will encounter similar issues.</li> </ol>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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		<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Roger Frankum (lpr1188)	<p>While I have some sympathy with the West Berks Council in finding space for its allocation of new houses, I really think the problem needs looking at again.</p> <p>I would have thought that the first thing to do following the elimination of the Grazeley area for possible housing, was to contact the government and point out the situation and request a reduction in its allocation.</p>	<p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to</p>

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	<p>It appears that the policy is based on data that is already three years out of date. Since the time of its collection we have had Brexit and now the Covid crisis. Both of these events are leading to change demographics, partly because fewer people are needing to work in London, or need to visit their work-place every day. This must alter the spread of housing needs across the country.</p> <p>The suggestion of 2500 house north-east of Thatcham is completely out of proportion. Thatcham has already grown a great deal in the past few decades without much in the way of new infrastructure and it is not at all clear how it could cope with a further very big increase in size. I am sure you will have heard about the problems of increased traffic, lack of parking at the station, no local surgery, minimal open space, the offers of perhaps half a secondary school being financed, and so on.</p> <p>I should like to point out that the proposed development is under 2 km from Bucklebury Common and that the Common is one of the few remaining areas of lowland heath. It is well known among other things for some special species of birds, in particular the nightjar, woodcock, and tree pipit. These nest on the ground and would not be able to cope with a large influx of people with their dogs. The development could not fail to have a strong adverse effect on the heath.</p> <p>While there is clearly a need for new housing, I hope you can see that the development in its present proposed form is just not a suitable option.</p>	<p>the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>
Ian Westbury (lpr1169)	<p>We strongly object to the building of 2,500 houses on the farmland between Upper Bucklebury and the A4 and Floral Way all but joining us to Thatcham.</p> <p>Our objections are:-</p> <ol style="list-style-type: none"> <li>1. Loss of rural countryside e.g. walking.</li> </ol>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be</p>

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	<ol style="list-style-type: none"> <li>2. The need to keep the green belt.</li> <li>3. Loss of agricultural land.</li> <li>4. Spoil the natural beauty of the countryside.</li> <li>5. Loss of wild animals and flowers.</li> <li>6. Pollution of the area.</li> <li>7. Even now there are many accidents on Harts Hill with regular closures.</li> <li>8. Continual noise, dust, fumes and mud on the roads if it went ahead.</li> <li>9. The amount of new cars etc.</li> <li>10. Thatcham railway crossing, will a bridge be built as at the moment you can sit in your car for up to 20 minutes plus waiting for a train to go by.</li> </ol>	<p>important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected</p>



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		<p>increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Julie Taylor (lpr1180)	I object to the proposed build. There is not enough infrastructure.	Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has

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		taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Penny Allum (lpr1172)	<p>I am writing to voice my strong objection to the 2,500 housing development proposed for the rural area north of Thatcham. This proposal shows both weak leadership and lazy planning by West Berkshire Council. The argument given in favour of the proposal seems to be, "We have to build this number of houses and if we don't accept we may have something worse forced on us by central government, and there are no better alternative sites". West Berkshire Council should be challenging the annual building requirement, as other local authorities have done. Given the recently extended exclusion zone around AWE, together with the AONB and flood plains, you should be arguing forcibly for reduction in this building requirement. It is also extremely poor planning to build all the housing requirement in one site, especially given the rural nature of the area. This is not a case of NIMBY, it is a case of a completely inappropriate building proposal for the location. This development will in effect lead to Upper Bucklebury joining onto Thatcham, leading to the removal of its village feel and impacting onto the adjacent AONB.</p> <p>Many residents have previously come across some of the landowners and developers involved in this proposal in relation to other schemes. They have consistently shown themselves to care far more about profit than the local community that you are meant to represent. They have attempted to pacify objection by the inclusion of three schools and other limited facilities. Without timescales on these facilities I would question when they would be built by such developers. Kennet School is already heavily oversubscribed and cannot cope with the increase in numbers that even the first phase would bring. No thought has been given to facilities such as doctor surgeries, post office, supermarkets and library; all of which are already extremely busy.</p> <p>A major concern is the impact on traffic. The information I have seen is very basic and doesn't take into account the actual number of extra vehicles such</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>

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	<p>a development would bring. At peak times, during normal circumstances, Harts Hill is already extremely busy, and is a narrow, windy, dangerous road. Traffic lights at the bottom of the hill will cause large tailbacks on this hill, as I am sure priority will be given to Floral Way traffic. The development would also see an increased number of cars coming up Harts Hill and through Upper Bucklebury as alternative route to the M4 and A34.</p> <p>Approving this proposal would be letting down the community you represent and have a negative effect on all of our daily lives. I already know people in Bucklebury and Thatcham who are saying if this development goes ahead that they would be leaving the area.</p>	<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Elizabeth Fenston (lpr1175)	<p>Our key areas of objection to the proposed major development of such a sizeable nature so close to Upper Bucklebury and the Pang Valley are around the environmental impact of such a substantial development in the area; and the knock on result of 'joining up' all urbanised areas of West Berkshire.</p> <ul style="list-style-type: none"> <li>- The proposal is the size of an entirely new town.</li> <li>- It is impacting an area of outstanding natural beauty that already has the un-moveable border of M4, along which there is ribbon development from London.</li> </ul>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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	<ul style="list-style-type: none"> <li>- We are already almost a suburb of London, increasingly encroached upon from Wokingham, Reading and Newbury.</li> <li>- West Berkshire is really becoming entirely urbanised or semi-urbanised</li> <li>- There will be a significant impact on rare species; animals, bats and birds including Barn Owls.</li> </ul>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p>

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		<p>The proposed allocation of sites takes account of the evidence from the HELAA and Sustainability Appraisal (SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy. Thatcham lies in the top tier of the settlement hierarchy (it is an Urban Area). Urban Areas will be the prime focus for housing and economic development.</p> <p>The proposed strategic allocation of North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p>
Derek Young (lpr1185)	<p><i>Representation includes objection to earlier planning application at Siege Cross, attached.</i></p> <p>I have become aware through the Media that another development is being proposed for the Siege Cross area, just off Floral Way. I very disappointed that I only found out about this proposal through the media and not through official channels.</p> <p>I put in an objection to the original proposal when it was for 500 dwellings, some years ago when Barton Willmore wanted to build, see the document attached.</p> <p>I cannot comment on the actual proposal because I have not seen what is proposed, I have searched the planning application section of the West Berkshire website but found nothing relevant, it would have been nice to have a more informed opinion.</p> <p>I am not surprised that this proposed development has been put before the council once again. What does surprise me is that it is now 5 times the size</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the</p>

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	<p>of the original proposal and therefore the impact on the area is 5 times worse.</p> <p>So in the years since the last failed attempt what infrastructure changes have happened in the Thatcham area, that would be none. But what has happened in the area are flood defences which were needed given the flooding that occurred in 2007. But the new proposal will build straight over these and we would find ourselves back to where we were. I am so glad you are allocating council tax money so well.</p> <p>The roads are the same but will now be 5 times more traffic, the level crossing is still there and there are still only 2 real ways into and out of Thatcham, the A4. Should the development go ahead all roads through to Basingstoke and the A34 will become rat runs including Ashmore Green as some of the 10,000 new vehicles try to get out of the area. The schools in the area will not be able to cope with the number of new vehicles and it will be almost impossible to get an appointment at the doctors as the surgeries will over capacity.</p> <p>This proposed development is the same size as Hungerford, this area cannot cope with an influx of residents that size why not build another Hungerford.</p> <p>What attracted my wife and I to this area was the easy access to green spaces coming originally from London, and now you plan to take that away from me.</p> <p>I realise we, as a country need more houses but for a development of this size a new town could be created with all new facilities enclosed within the development and not something stuck on the side of an already reaching capacity town like Thatcham.</p> <p>This proposed development is <b>wrong</b>, the environment will suffer, there is no additional infrastructure the existing residents of Thatcham and the</p>	<p>development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised</p>

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	<p>surrounding small towns will suffer and should the development go ahead the new residents will suffer.</p>	<p>since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>

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Jim Hunt (lpr1181)	<p><b>Objection to Thatcham Development</b></p> <p>I wish to register my objection to the proposed development to the north of Thatcham for the following reasons.</p> <ol style="list-style-type: none"> <li>1. The developments size and elevated position will have a hugely detrimental impact on the views of and around Thatcham. It will be visible from miles around and will adversely impact the AONB that surrounds it.</li> <li>2. Traffic volumes: The development will generate traffic volumes that the roads and local villages will simply not be able to cope with. 2,500 homes equates to 5,000 cars. The A4 cannot cope with the volume of traffic currently: it will certainly not be able to cope with such a significant increase. This increase in traffic will not just impact the A4 - local villages such as Bucklebury, Hermitage, Cold Ash will also be subject to significant increases in traffic volumes as cars travel to J13 of the M4 for M4 and A34 access.</li> <li>2. It would join Thatcham with Upper Bucklebury. WBCs own plans state that Upper Bucklebury should retain its own rural identity yet this plan contradicts WBCs own plan. Speeding is a significant issue in Upper Bucklebury (especially Burdens Heath) where children have to walk on the road verge due to the lack of pavements. Drivers regularly speed excessively along this road. This is particularly a problem for Burdens Heath - this development will significantly increase this problem and the danger posed to pedestrians.</li> <li>3. A previous such application was rejected by the Secretary of State in 2017 (<a href="https://www.newburytoday.co.uk/news/news/22045/minister-rejects-two-housing-developments-for-thatcham.html">https://www.newburytoday.co.uk/news/news/22045/minister-rejects-two-housing-developments-for-thatcham.html</a>). Why has the council now spent considerable funds investing in a proposal that has previously been rejected ?</li> </ol>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural</p>



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	<p>5. Councillor Hilary Cole has stated that she is keen to work with the neighbouring villages “because it’s such a big proposal and development for Thatcham”. We have had very little, if any consultation or notice about this! It appears as though WBC are trying to present a fait accompli.</p> <p>6. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). It will simply increase pressures on the roads and services to the detriment of everyone.</p> <p>7. Such a large area of roofs, roads and drive ways will result in significant rainwater runoff down into Thatcham. There is a high probability that this will increase the chance of flooding in Thatcham.</p> <p>8. Impact on nature. This development will destroy much needed habitat for a number of protected species, including the great crested newt, common lizard, adder, grass snake, slow worm and bats. Increasing amounts of cars and people visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this need to be protected and not destroyed.</p> <p>I hope you withdraw these plans, especially as similar proposals have already been made and withdrawn.</p>	<p>routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision,</p>

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		<p>adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the</p>

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		<p>Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
<p>Pam McNish (lpr1182)</p>	<p>I am writing to ask for reconsideration of the size of this development. I understand, of course, the need for new and especially affordable homes but I wonder if, in view of the changing position in the UK, it would be prudent to reassess the need for such a large development. Others have stated many reasons for that already which I will not repeat but having lived in the Upper Bucklebury area for 40 years, my main concern is traffic on Hart's Hill Road.</p> <p>I, my family and friends have had several 'near misses' on the road and now that there are far more cyclists using it, I feel it would be negligent and irresponsible of me not to bring this to your attention.</p> <p>I am writing to ask for reconsideration of the size of this development.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		and lifestyle choices will be important elements of the overall transport plan.
Ivan Lowe and Tara Saglio (lpr1186)	<p>We were both greatly distressed to hear earlier this week about the plans being considered for a massive housing development in Thatcham that would ruin our beautiful area and remove a much treasured space forever.</p> <p>Thatcham has seen a lot of development in recent years and little attention has been taken in trying to preserve the character and quality of the surrounding areas. It is important that the rural beauty of Upper Bucklebury be preserved so that generations of people can continue to enjoy it.</p> <p>This massive development will bring extra traffic and pollution to our communities with little benefit by way of investment in the local industries. The influx of people will be a spillover from London and Reading commuters with no vested interest in our heritage.</p> <p>We both strongly object to these proposals and request that planning be refused.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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Drew Noble (lpr1187)	<p>The overdevelopment of this area is impacting Thatcham Green Belt and leading to an increasing in destruction of countryside and wildlife.</p> <p>Fly tipping in our local woods has increased over the years which the local residents end up dealing with, this along with the traffic and pollution that 2500 homes will bring will be a risk to our countryside, with the majority of residents in West Berkshire owning 1-2 cars per household.</p> <p>Crime in the area is also increasing whilst we are building more and more houses. Bucklebury was subject to burglaries over the Christmas period which is now a common theme for the resident neighbourhood watch.</p> <p>I do not see the job market or business opportunities increasing at the same scale. Is there a plan to attract more business to the area to offset the unemployment or lead to an additional 2500 &gt; 5000+ new jobs for residents? West Berkshire are already handing out grants to local business that are failing due to the pandemic.</p> <p>People are travelling further for work – Thatcham and Newbury train station car parks are already over saturated (prior to lockdown). More overcrowding on commuter trains leads wider safety issues and increase in ticket prices.</p> <p>Having previously lived in Reading I moved back to the area due to the crime, drug and homeless problem I would hate to see this county follow in its footsteps.</p> <p>Preferably I would like this development stopped. This area is already densely populated.</p> <p>I support the development of Doctors surgeries and schools which are already under pressure rather than more houses.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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Marie Briscoe (lpr2000)	<p><i>Some personal details removed from representation</i></p> <p>I am writing with regard to the proposal to build 2,500 in the green belt at north Thatcham. I strongly feel that this would cause a massive problem with regard to the extra amount of traffic, particularly at already very busy times of day. The increased levels of pollution as well as the loss of so much natural habitation will be devastating for the local wildlife.</p> <p>There is simply not enough help available for children's mental health. With the extra pressure that COVID related problems are going to generate, to potentially add so many extra families to the wait lists, there is no way the local services are going to be able to cope. The same can be said about the SEN provision, it is drastically underfunded and it doesn't give the amount of support so critically required. The thought that the limited amount of resources there are available could be spread even thinner is a sobering one.</p> <p>I do hope that the wider reaching impact of such a huge development will be thoroughly considered.</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>

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		<p>modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Frank and Marion Martin (lpr1190)	<p>I wish to lodge our objection to the proposal to build 2,500 houses between Floral Way Thatcham and Midgham parish, on the following grounds:</p> <ol style="list-style-type: none"> <li>1. This is green belt farm land which should not be developed. We need to retain our green spaces - they are vital for our well being and for the planet!</li> <li>2. If you allow any building to take place on this land, it will be damaging for wildlife, the environment and people's mental health.</li> <li>3. 2,500 houses means 5,000 additional cars on the roads in this area. This will have a huge impact on the amount of traffic on the A4 and local roads</li> </ol>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>

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	<p>and significantly increase the amount of noise and air pollution. Green spaces help to reduce air pollution - houses and vehicles cause it!</p> <p>4. There is already poor social infrastructure in this area. The proposed development will only add to this.</p>	<p>strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the</p>



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		LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Margaret Wyatt (lpr1192)	2500 homes will effect all the villages along the ridge to Theale joining us up to Reading. Not only will there be a loss of rural countryside but we will not see the stars again. Please have vision and visit the poundbury near Dorchester. Quality not quantity is important.	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Robert Gerdes (lpr1216)	<p>Objections to this development proposal are outlined below:</p> <p>a. Loss of rural countryside &amp; impact on flora and fauna - unique character of this area.</p> <p>1. This area of farmland and underdeveloped land provides a valuable habitat for a wide variety of wildlife including (but not limited to): Badgers, honeysuckle, ivy, primrose, bluebells, cowslips, Hares, Lapwings (and Lapwing chicks), foxes, deer, field mice, newts, bats, red kites &amp; owls, to name but a few items that are in this area. This bountiful nature enhances</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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	<p>the local area and forms part of the rich land heritage of this area of West Berkshire.</p> <p>b. Impact of housing on flood defences</p> <p>1. Thatcham has for a long time, been at risk of flooding. This was highlighted in the incidents of flooding in the late 2000s (2007/8?). Whilst corrective action has occurred, even by 2021, work is still ongoing, some 10+ years later to improve this. This development would therefore put strain on existing defences and expose gaps. The proposal may highlight how this may be addressed, however there is a risk that this has been done using old and outdated assumptions. This will create unnecessary risks. With the clear impact of global warming (increasing incidence of a one in a hundred year storm or the projected seriousness of it) will create impacts on business and householders. The addition of paved land, on a notable slope will increase the runoff from this land. A critical point of attention is that this will be over an already at strain road infrastructure, such as Floral Way, the A4 and other roads in the area.</p> <p>c. Infrastructure</p> <p>1. Work on Harts Hill to improve the provision of water supply to Upper Bucklebury.</p> <p>1. For over 10 years, Thames water has tried to patch and provide a regular supply of drinking water to the village of Upper Bucklebury. Most recently (over the last 2 years) an additional investment was made as the rolling 'patching solution' clearly was not working; resolved the situation. During that time Harts Hill was beset with work traffic, lane closures and closed down completely over the 2 year period. Whilst Thames Water has at last looked to resolve this issue it has taken in excess of 10 years to do so. A development of houses will raise this risk once more.</p>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic</p>

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	<p>2. The road infrastructure throughout this area is not equipped to deal with the substantial increase in traffic that will result from a development of this size. Floral way, an already busy A4 (pre COVID), roads through Thatcham and surrounding areas (including the various villages) mean that additional traffic of quantum that will result from ~2500 houses would be extremely serious and impactful. The use of cut throughs has not been acknowledged with this proposal. Villages in the surrounding area already have too many vehicles passing through them at high speed. This will only increase with an increase in housing of this quantum. This risk impacts the local communities and all living in the surrounding area.</p> <p>3. Existing Doctor and Dental surgeries, along with the Thatcham minor Injuries hospital in Thatcham and the surgeries in the surrounding area do not have the capacity to deal with this large increase in headcount. This will seriously negatively impact existing patients with accessing these key services, as well as impacting new residents.</p> <p>4. Sports Center at Kennet - The sports center by Kennet school is a well used (pre COVID) facility for families in the surrounding area. This would be insufficient in size for usage with the increase in families from a development of this size, both with packing to use the facilities as well the size of the facilities themselves.</p> <p>5. Facilities in local secondary schools in Thatcham. Kennet School manages amazing things with the extremely dated and limited resources it has at its disposal - however West Berkshire has not invested sufficiently in the school. Investment in this school needs to be taken to deal with the intake from the existing developments. To date, this has not been done at a sufficient rate. This results in a school that has old, energy inefficient buildings that leak and an infrastructure that is really at its limit and not sustainable. As an illustration of this, the school does not have a hall big enough to meet with all pupils in one go; it has temporary buildings that are very old to teach a range of pupils in (such as Maths) that although are temporary are now used as permanent buildings. The additional 2500 houses will undoubtedly put this valuable (but very stretched) resource at</p>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5</p>

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	<p>significant strain. Building new schooling facilities in this development will not resolve this situation. This must be taken into serious account as part of any future housing proposal around Thatcham as to date it is not been. The other schools in the surrounding area of West Berks have far more modern facilities added to them to help cope with the building of new houses, but for some reason Thatcham (and its secondary school has not). This lack of investment (and impact from additional housing) will put at risk thousands of existing children's education (which the COVID situation has already put at risk) with additional children enrolling at the school (irrespective if a proposed school is built as Kennet school will be expected to pick up the strain whilst a new school is built). Please refer to point di) below to see the size of population increase in the past 10 years (2001 - 2011) equates to the size of this proposed development - yet the schooling infrastructure in Thatcham is very strained.</p> <p>6. School Bus Service from Upper Bucklebury to Kennet School. The Council removed the bus service for school children from Upper Bucklebury to Kennet School. The council feedback on how school children were to get to school was that they were expected to walk down Long Grove (unlit, muddy), over the field (that is now expected to be developed) across an already busy A4 to then gain access to the school. Point of note is that there is no pedestrian crossing for school children to use. In light of this decision there has been a large increase of traffic up and down Harts hill at school time of parents driving their children to and from school. This, during rush hour, leads to tailbacks on the A4 with children using the pedestrian lights to cross by the skateboard park (and where the old blue coats school was). With the increase in families wanting to access the school, existing children who walk down Long Grove to school, existing families that drive their children to school and those that cross by the Blue Coats school will exacerbate this situation further.</p> <p>7. Railway. Thatcham station has a line to Newbury, Reading and London. The fat train to London is well used (Pre COVID) by commuters as well as</p>	<p>FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation</p>

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	<p>using the line to Reading. There is insufficient Parking (Pre-COVID) for users as well as catering with new users due to the development.</p> <p>8. Roads around the Station. The tailbacks of traffic due to the safety barriers being used (no objection to the safety barriers per se) highlights the amount of strain on existing roads. It is well documented the environmental impact and health impact of stationary cars with engines running has in the locality. A development, as outlined, will exacerbate this situation further impacting local residents in and around the Station (already developed with recent / new housing and the nearby Kennet School.</p> <p>d. Overdevelopment</p> <p>1. Thatcham and area has had a very rapid increase in housing stock (population in 2011 as referenced in the census is 25,267 an increase of 11% from 2001 or 2,443. Bucklebury saw an 18% increase between these dates- data pending for 2021 census). The housing estates around this area (such as Dunstan Park) were implemented without taking into consideration impacts on the locality which are only now being addressed (see point above on flood defences) - however the impact on roads have not been addressed.</p> <p>2. The proposed amount of houses is roughly a similar size to Hungerford yet in a far more concentrated space. Hungerford has its own set infrastructure to cater for their residents (schooling, health, shopping, parking, roads) - this development will put additional pressure on existing infrastructure that can barely meet today's requirements.</p> <p>e. Pollution</p> <p>1. The proposal makes minimal reference on how it will address the considerable increases in different forms of pollution (Air, Noise, Soil, Social and Light). The proposed area to date is beneficial in regards to these factors as none of these types of pollutants occur (ie it does not generate Air pollution, in fact as a green site it absorbs</p>	<p>18 consultation to strengthen the Council's policy on pollution.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>

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	<p>CO2 and air pollutants, Noise - it is peaceful, Soil - it is farmed currently or left in a natural/ fallow state, Social - not a high density of people living there or light pollution - only the lights from existing dwellings which are minimal). The building of 2500 will generate pollution. The increase in traffic will generate noise &amp; air pollution; the housing and people living there will create all increased pollution in all five noted categories. As this area is welcomed and used by wildlife (as noted) and by the surrounding community there will be a very negative pollution impact on Thatcham and surrounding area.</p> <p>ii. Loss of Thatcham greenbelt / rural land</p> <p>1. Greenbelts provide the 'lungs' to the country. It ensures a better quality of living for those that live in built up areas (such as Thatcham and Newbury / Theale / Reading) to then utilise it (for recreational purposes). Once developed this area will be permanently damaged meaning that the beneficial outcomes we all have today from such land will be removed.</p> <p>f. "The West Berkshire Local Plan Review to 2036" which was consulted upon prior to this proposal and highlighted a number of strategic objectives (noted):</p> <p>1. Section 3.1.1 (Climate Change - To mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.) - this proposed development does not align with this - as outlined in point b, d and e of this letter.</p> <p>2. Section 3.1.3 (Sustainable and Quality Development - To ensure provision of sustainable developments of high quality design, construction and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all.) The land usage efficiency I would challenge</p>	

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	<p>as building on rural / natural, undeveloped land is not an efficient usage of land. Building on existing developed sites logically is.</p> <p>3. Section 3.1.5 ( Town Centres - To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities). As noted in point c) iii), c) iv), c) v), c) vi), c) vii), c) viii), d) i) and d) ii) above highlight the existing gaps that have not been filled to date with existing development. The quantum of this size of development in a single area will put a considerable strain on existing services.</p> <p>4. Section 3.1.7 ( Heritage - To conserve and enhance the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside.) The size and scale of this development will negatively impact as opposed to build the local distinctive character as highlighted in the huge increase in traffic throughout the surrounding villages and countryside.</p> <p>5. Section 3.1.9 (Green Infrastructure and Healthy Living - To ensure that West Berkshire contains a strong network of multi-functional green infrastructure which provides health and environmental benefits and enhances the overall quality of life of sustainable communities). As noted in point i) and a), this area of land is enjoyed by many to walk, observe the biodiversity and use for recreational activities. Building of the size and scale noted in the proposal will deleteriously impact this valuable resource in conflict with this strategic objective.</p> <p>6. Section 3.1.10 (To make provision for transport networks that support sustainable growth in West Berkshire and to promote low emission transport choices.) The existing transport infrastructure cannot cope. Pre COVID (and as noted in a number of points in c) highlight that there is insufficient capacity existing for a development of this scale. This strategic objective is out of line with what is being proposed.</p>	

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	<p>7. Section 3.1.11. Infrastructure (To ensure that infrastructure needs (physical and social) arising from the growth in West Berkshire are provided to support and keep pace with development in accordance with the detail set out in the Infrastructure Delivery Plan.). A development of this size and scale is at odd to this strategic objective, as observed in points made in b), c) &amp; d).</p> <p>ii. Policy CS 17 Biodiversity and Geodiversity Biodiversity and geodiversity assets across West Berkshire will be conserved and enhanced. As noted in point a) this area of land contains a diverse array of flora and fauna (examples of which were listed). The development at this location will negatively impact or remove this biodiverse area in misalignment with themes and points highlighted in CS 17.</p> <p>In summary to all of these points above, I am against such a development of this size and scale in such a valuable (both social and biodiverse) area of West Berkshire as well as the impact that it will create.</p>	
	<p>I object very strongly to the proposal of building 2,500 houses in North East Thatcham. This would create a massive influx of people, additional traffic and this site would obviously feed all the traffic on to the A4 therefore overloading the road.</p> <p>Thatcham has seen a quantity of large estate type building over the past 40 years.</p> <ul style="list-style-type: none"> <li>• The Moors south Thatcham,</li> <li>• The rivers estate off Bowling Green Road.</li> <li>• Seige Cross.</li> <li>• Floral Way crossing Hart's Hill.</li> <li>• The large estate off station road Tull Way in the last year.</li> <li>• The most recent development under construction next to Waitrose.</li> </ul>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements</p>



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	<p>Some of these estates are now well established but people forget how large in size they were when first constructed.</p> <p>Traffic</p> <p>An extra 2,500 houses and school/s would put at the minimum an extra 2,000 extra vehicles in the area. (this is not taking into account 2<sup>nd</sup> cars or families that have teenagers with their own vehicles) I am sure that any arguments planning put forward for public transport would not sway people to use it, even if it is more environmentally friendly as it is infrequent and expensive and generally not convenient. People these days will always opt for the ease of having their own transport. In addition any school/s built will also increase traffic flow at peak times. There is already one school on the A4 (Francis Bailey) and Kennet School is also off the A4 which also takes it toll on the A4. Hence the A4 would potentially be loaded with school traffic (Harts Hill/Floral Way could possibly be impacted with this traffic too). Planning today also seems to think people will not buy/use cars and therefore do not build homes for vehicles to be parked on properties owned by residents, hence overflow parking on pavements and roads.</p> <p>This additional traffic will also put pressure on the Thatcham railway crossing as people will use this route to access roads to Basingstoke and Newbury Retail Park.</p> <p>Countryside</p> <p>An extra 2,000 vehicles will also be pressure on the surrounding area ie extra journeys to and from Newbury and Reading and surrounding areas. This part of Thatcham borders an Area of Outstanding Natural Beauty, which has been chipped away at by building ie the estate on Floral Way and Seige Cross. Upper Bucklebury is used as a back route to Reading and surrounding areas and has turned into a rat run and what was once a quiet village now has almost constant traffic driving through the village at peak times even during this past year. Bucklebury Common is becoming a</p>	<p>being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water</p>

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	<p>playground for motorised vehicles (4x4s and motorbikes), which is most obvious during the winter months.</p> <p>West Berks Council put up metal fencing panels and traffic orders during the winter months to restrict use by mechanical vehicles, also, bollards have been erected, which in some cases have obviously been knocked down on purpose to gain access to the tracks through the common. I would suggest planners speak to their counterparts in the Countryside Department to see what complaints they receive about use of the common. This type of traffic use puts wildlife at a great disadvantage, death of deer is quite a common occurrence and I have quite often had to move dead animals from the road crossing the common. Vehicle journeys via Greenham Common will also put pressure on common grazing animals. By building on green sites we are once again pushing our wildlife and associated vegetation to smaller areas.</p> <p>Pollution</p> <p>Extra housing, vehicle movements and additional lighting will increase pollution in the area. Also the noise and commercial vehicle movements whilst the houses are being built.</p> <p>Commercial</p> <p>Additional housing will not increase employment, only in the short term as it won't necessarily bring in new employers.</p> <p>All in all I think that this proposal is greatly unwarranted and will spoil what is part of our green belt and I think that Thatcham has had its fair share of residential building in the past years having been a resident of Thatcham before moving to Upper Bucklebury.</p>	<p>Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>
Gordian Troeller (lpr1193)	I wish to object most strongly to the proposed development of 2500 houses between the A4, Floral Way and Upper Bucklebury.	The site is not within the Green Belt (there is no Green Belt in this District).

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	<p>This development will destroy the 'green belt' around Thatcham, will increase traffic and pollution for all residents within and adjacent to it . There is also a loss of rural countryside which is important not only to the residents of the surrounding villages but also to the community of Thatcham</p> <p>Furthermore, a development of such size will put a severe strain on public services. It will also adversely impact the rural nature of the surrounding villages such as Upper Bucklebury. .</p> <p>I would urge you to refuse planning permission for this project and trust that you will understand and honour the objections of the whole community</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a</p>

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		'living document' and will be updated regularly updated in consultation with infrastructure providers.
Debbie Potter (lpr1202)	<p>I am writing to object to 2500 houses being built on farmland between Upper Bucklebury and the A4.</p> <p>I gather the people making the decisions have no idea about the traffic chaos that would come with this development. The A4 is already overloaded with long tailbacks in the morning. It cannot take anymore traffic, this could potentially add another 5,000 cars on that road.</p> <p>The infrastructure is not there to support such a large development. There would be a huge loss to the countryside and add a large amount of pollution. Traffic has increased significantly in Bucklebury and Chapel Row and will only get worse with this development.</p> <p>I therefore object!</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure</p>

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		Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Ian Dunn (lpr1203)	<p><u>1]Infrastructure:</u></p> <p>Except for flood defences there has been no infrastructure updates in Thatcham which could allow any further housing development nor does this review offer any from the provision of 2,500 new houses, although it is likely to put serious pressure on what presently exists namely</p> <p>a] <u>transport</u></p> <p>All movements on the A4 will be hampered by the addition of cycle tracks &amp; additional traffic from the new development.</p> <p>Journeys to the south will add further to the pressure on passage over the railway [the train is n NOT a viable option to basingstoke !]</p> <p>Trains will still be subject to unnecessary delays if the signalling intervals remain as they are unless the crossing is bridged.</p> <p>Journeys to North &amp; east / west will always ad to traffic via Cola Ash/ Chieveley &amp; Bucklebury/Bradfield which are already overloaded</p> <p>b]<u>services</u></p> <p>waste water still surcharges in storm conditions in Thatcham. The solution is apparently upsizing of pipes &amp; facilities at lower way, with consequent disruption through Thatcham for years hardly a BENEEFIT !!</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely</p>

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	c] <u>business</u>	<p>infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Peter Spours (lpr1204)	<p>We are residents of &lt;personal information removed&gt; and OPPOSE the proposed development at North Thatcham.</p> <p>The analysis of housing demand relies on out-of-date information because it fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this is ignored in the proposals.</p> <p>Until this proposal was tabled, the land north of Floral Way has provided the strategic gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and will visually and socially break natural community boundaries.</p>	<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the</p>

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	<p>A development of the scale proposed will generate considerable traffic but the analysis in the proposal underestimates impact on Bucklebury and Chapel Row. It is assumed that the bulk of the new traffic will use the A4, accessed via Floral Way. However, the A4 is already overcrowded at peak times and the new residents will look for alternative routes to the A34 and M4. The roads through our village are ill suited to additional traffic; they are rural, single carriageway, mostly lacking footpaths and featuring blind bends. Speeding is a well-known problem in Chapel Row and more cars will make a dangerous situation worse.</p> <p>This development will have a lasting and negative impact on the AONB directly and from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation but is already witnessing habitat damage from walkers, cyclists and motorised vehicles. Additional visitors will make a bad situation much worse. In addition, the development will generate extraneous light that will upset the life of birds and mammals; they cannot adapt and will be driven from their habitats.</p> <p>Finally, we are concerned that the volume of homes proposed will generate unacceptable pollution from carbon emissions. The clean air of the Common would be a thing of the past.</p> <p><u>We urge the proposal be rejected.</u></p>	<p>continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Katie Powell (lpr1205)	<p>In reference to the NE Thatcham Development proposals made by West Berkshire Council as part of the Local Plan Review 2020 -2037 Emerging Draft December 2020 document, as a resident of Upper Bucklebury I would like to object to this development proposal for a number of reasons.</p> <p><b>Scale of Necessary Developments:</b></p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more</p>



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	<p>While I understand that a certain amount of development is always required in every area of the country to ensure that there is enough housing for the growing population, as West Berkshire only has 15% of its land area which can be developed on, I would question the fact that as many as between 530 and 570 houses would need to be built each year, when there are areas of the country when a far higher percentage of the land can be more easily developed. Surely this is something that WBC should be taking up strongly with Central Government.</p> <p><b>Lack of Consultation:</b></p> <p>WBC chose a time, just before Christmas at a time when people were more concerned about Covid-19, to present this development plan to the public in the Newbury Weekly News (December 21<sup>st</sup> 2020). For a development this size, surely they should have informed the public in every way possible, to ensure that all local views are considered. This could maybe have avoided this slightly 'cloak and dagger' situation, where there are still people in Thatcham and the local villages saying "What development?", 5 days before the deadline for objections. A longer period of consultation should maybe be offered to ensure everyone is fully informed.</p> <p><b>Traffic:</b></p> <p>The increase of traffic associated with 2,500 new houses is of great concern, in an area where the main road (A4) is already often very congested. Thatcham is already affected from East to West by the very heavily trafficked A4 and to the south by the level crossing with ever lengthening queues many times during the day. Furthermore, the traffic forecasting in the plan already anticipates that a proportion, about 10%, of new traffic generated by the development will pass up Harts Hill and into Bucklebury Parish, probably mostly through Upper Bucklebury and on to the villages of Cold Ash or Chapel Row and Southend Bradfield. Roads through Bucklebury Parish are</p>	<p>housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the</p>

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	<p>wholly inadequate to support increased traffic volume and speeds. I have three particular concerns about this:</p> <ul style="list-style-type: none"> <li>• Harts Hill Road from Thatcham to Upper Bucklebury is characterised by a steep hill and multiple blind bends, all of which are relatively narrow and unlit in keeping with the proximity to AONB. This is already a hazardous route, with numerous traffic accidents on this road with the existing amount of traffic, this can only be worsened with any increase of traffic.</li> <li>• I question the fact that it is forecast that there will only be an increase of 10%. There are many times when the already overcrowded A4 is so congested, that people come up Harts Hill to avoid this route, using it as a ‘rat run’. This is made especially bad when at times there are roadworks or the M4 is closed. Equally other routes further along which would affect Woolhampton and Beenham will be chosen to avoid the congested A4. The increased traffic will be a safety concern for local residents, particularly children whilst walking to and from school.</li> <li>• The increase of pollution in a rural area emitted and damage to already bad roads by potentially 5,000 new vehicles is immeasurable.</li> </ul> <p><b>General Pollution:</b></p> <ul style="list-style-type: none"> <li>• A development of this size will enormously increase both noise and light pollution in the rural village of Upper Bucklebury</li> <li>• This development will increase pollution during the construction and from the increased population and traffic thereafter. West Berkshire declared a climate emergency on 2 July 2019, this development contradicts this declaration.</li> </ul> <p><b>Flooding:</b></p>	<p>IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has</p>

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	<p>The area for development is at present sodden, the roads from all the villages are streams, where will the excess water go when the land that is presently trying to soak it up has been concreted over? Are we to return to the floods of 2007 in Thatcham?</p> <p><b>Negative Impact on Surrounding Villages &amp; North Wessex Downs AONB:</b></p> <ul style="list-style-type: none"> <li>• Whilst the plan seeks to cap the development at 100m above sea level, in contrast to Upper Bucklebury sitting at 134m, in order to limit visual impact on the AONB, there will be an impact nonetheless. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration.</li> <li>• Bucklebury Common, which is public access land sitting adjacent to the proposed development, is already experiencing elevated levels of visitors including illicit vehicular access all of which is causing damage to the environment through inconsiderate parking, dog fouling, littering, 4x4 and motorcycle disturbance &amp; damage all of which is detrimental to the valuable natural environment including rare Heathland habitat. It can be expected that the impact of this development can only be severely detrimental to Bucklebury Common.</li> <li>• WBC seeks to implement a "country park" belt between the 100m cap and the land above, further detail is required to ensure that this area is adequately protected to guarantee it is safe from future development. The country park area will require concrete plans for landscaping it so that it creates a buffer zone to attract the new residents and mitigate the anticipated growth in visitors to Bucklebury Common.</li> </ul> <p><b>Inadequate Supporting Infrastructure for Scale of Development</b></p>	<p>undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position,</p>

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	<ul style="list-style-type: none"> <li>• The proposal doesn't contain details of an increase in healthcare services to support +25% housing in the Thatcham area. Also, is West Berks hospital able to support his increase? As the congestion on the roads will make blue lighted transport to Reading and other hospitals more risky.</li> <li>• The proposal doesn't address the strain of increased demand on Thatcham Train Station. Taking into account the fact that parking facilities at Thatcham Train Station are already insufficient to cope with current demand, there would need to be a significant increase in the provision of parking at the station to cope with increased demand.</li> <li>• The road infrastructure in a number of common commuting directions from the development are not sufficient.</li> <li>• There are no timescales for the building of schools and other amenities. Do we know these would actually happen?</li> <li>• The new development would be comparable to the size in population of Hungerford, in a much smaller and less developable area. Hungerford has a cultural centre, library, many places of worship, town centre. Simply offering schools and some playing fields will not be enough to provide a decent quality of life for the residents, so the people will need to go to Thatcham, which WBC (see comments by Councillor Hillary Cole in NWN 21/12/20) has already admitted to having limited amenities for the number of residents there now, or to the tiny village of Upper Bucklebury, which is ill equipped to cope with a large influx of people.</li> </ul> <p><b>In the event of a development of some sort in West Berkshire, could I request that WBC think carefully of the following possibilities:</b></p> <ul style="list-style-type: none"> <li>• Reduce significantly the development from its current size of 2,500 houses, to limit the impact of residents in both Thatcham and the outlying villages, maybe concentrating on the lower parts of the site, near Colthrop, limiting traffic problems and other impacts as highlighted on the villages in this area.</li> </ul>	<p>annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>

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	<ul style="list-style-type: none"> <li>• Look more closely at an improvement in the infrastructure in Thatcham, independently of a new development as large as a town in itself without much additional infrastructure.</li> <li>• Consider using various sites around West Berkshire.</li> <li>• Consider objecting to Central Government about the number of properties to be built each year in West Berkshire, if indeed only 15% of the land is developable.</li> <li>• Look again at the development at Grazeley as Reading and Wokingham Councils seem to still be looking at that.</li> <li>• Above all, improve communication with the residents in this whole area, to regain trust</li> </ul>	
Lisa Parker (lpr1206)	<p>I am sending this email with my objections for this planned “Thatcham Development”</p> <p>The vast majority of Upper Bucklebury are against this development and I am one of those residents.</p> <p>A few of my objections include:</p> <p>Upper Bucklebury is a beautiful, rural part of West Berkshire and we will lose this affecting our green belt which will dramatically reduce our local wildlife.</p> <p>Large amounts of empty houses in local areas – why build new when we already have existing buildings which can be developed ?</p> <p>Having a development as big as Hungerford, without the towns infrastructure will make the development crammed and on top of each other</p> <p>Increased pollution</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Increased traffic – Harts Hill Road can be very dangerous at the best of times, more people will be looking for short cuts, affecting a high usage of this road (which I would also like to say is always full of pot holes, I'm not sure it would take much more traffic/usage)</p> <p>Increased water usage – Upper Bucklebury have just had a new pump installed which can just about handle our small village, how on earth will it be able to support the extra 875,000 litres of water (based on 350 litres per household)</p> <p>Light pollution – Upper Bucklebury currently only has 6 street lights, yet the new town will be fully lit</p> <p>How are you planning to fill the new schools with one planning to close already in Thatcham. Not every family will need a school, hence having schools half full for the majority of the time.</p> <p>Are there enough local jobs to support all these families – will we end up with a high unemployment area!!!!</p> <p>During lockdown so many people's mental health have been helped by daily walks and fresh air, without these what will people have !!!!</p> <p>So many memories have been made for myself and my family – sledging in these fields / wildlife walks / sunrises / picnics – how sad that other families will not be able to share these precious memories !!</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

Respondent (with lpr ref)	Response	Council Response
		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Lindsay Hallahan (lpr1207)	As a local resident of Bucklebury parish, I would like to strongly register my objection to the proposed full development of the above sites for the following reasons.	In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.

Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>1. The Vast majority of Upper Bucklebury residents are against this development, many have already registered their objections, however many are not aware of the application or consultation as no information has been sent out by WBC. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> <li>3. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating <b>“particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”</b>. WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</li> <li>4. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far?</li> <li>5. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it is allegedly the government driving this would they not be more open to changing some AONB status ?</li> </ol>	<p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>6. In the NWN the following statement is attributed to Hilary Cole. The council's executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), said: <b><i>“We are very keen to work with the local community because it’s such a big proposal and development for Thatcham. “We have taken a conscious decision to do this around Thatcham so it will deliver the infrastructure we need. “We feel that Thatcham is best placed to take a development of this size.”</i></b></p> <p>I have two specific issues to object to on these statements made. Firstly WBC have done very little if any to work with local residents – see above points and secondly Ms Cole’s statement infers that the decision is made, so why is so called consultation being held? Because of this she should resign.</p> <p>7. WBC and Thatcham councils have wasted a great deal of tax payers money in completing many surveys and writing an 800 page report, effectively making this a fait accompli, before going to consultation on the proposal.</p> <p>8. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <ol style="list-style-type: none"> <li>1. This will significantly impact the freight traffic using the industry site at Thatcham</li> <li>2. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes. This has a severe negative impact on wildlife, the environment and also human safety for walkers and children who live in these areas.</li> </ol> <p>9. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</p> <p>10. It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p>	<p>The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’</p>

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	<p>11. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this size. The shop is also likely to suffer as the plan indicate that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</p> <p>12. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</p> <p>13. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</p> <p>14. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>15. The HELAA was updated in December 2020 to take account of factual inaccuracies – who is to say that the same people who have made the assessment of this site don't have their facts right in this document or this time. What evidence can WBC produce to conclude everything stated is factually correct?</p> <p>16. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. When would this be built before or after the houses? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out?</p>	<p>/ visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in</p>

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	<p>17. What impact will Brexit have on new residents to the area in that we have a large proportion of EU citizens already here, but this is likely to continue in future hence is the demand for housing still appropriate. ONS statistics show that in 2019 29% of mothers of babies born were not from the UK. Does there need for such extensive development therefore required.</p> <p>18. West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environment_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environment_Strategy_Summary_A4_20.pdf?m=637141844400230000</a> WBC - Environment Strategy - <b>with declaration of climate emergency</b>. This will not contribute with the increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and so on</p> <p>19. The plan suggests the provision of a “country park”. There is no budget available for this.</p> <p>I sincerely hope that my concerns above are reviewed and considered carefully before making any decisions which would destroy the beautiful area that my family call home.</p>	<p>to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<p>development to the most sustainable locations in the district.</p> <ul style="list-style-type: none"> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Annabelle Gerdes (lpr1209)	<p><b>With reference to 170 hectares of land stretching from the top of Floral Way to Colthrop and into Midgham parish - Housing Proposal development - Local Plan Review (2020-2037)</b></p> <p>I am strongly against this proposed development and object to this planning scheme for the following reasons:</p> <p>Wrecking of habitats, loss of rural land and impact upon flora and fauna.</p> <ul style="list-style-type: none"> <li>This vital area of countryside acts as a significant habitat for many different species, such as: Badgers, Hares, Lapwings, Nightjars, Foxes, Deer, Muntjac, Field Mice, Newts, Bats, Red Kites, Owls, Squirrels, Buzzards, Kestrels, SparrowHawks and Yellow Necked Wood Mouse are to name a few. Flora including, the Meadow Saxifrage, Honeysuckle, Ivy, Primrose, Bluebells, Cowslip, Wild Orchid, Wood Anemone and Wood Sage. The built ecosystems are in a natural area of land in which these plants, animals and other</li> </ul>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These</p>

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	<p>organisms interact with each other and abiotic elements of the environment. The numerous organisms within these multiple ecosystems are dependent upon one another (ecosystem interdependence) and often very small changes to an ecosystem can have drastic consequences. The result of building 2500 homes near ancient woodland (and the impact of their being) would lead to a decline in wildlife and irrevocable loss of biodiversity and habitats. Furthermore the high levels of pollution as a result of the additional vehicles on the road will additionally add to this devastating issue. Leading me onto my next point.</p> <p>High levels of pollution.</p> <ul style="list-style-type: none"> <li>The stated proposal makes a restricted reference to how the pronounced increase of the variety of pollution (Soil, Social, Noise, Light and Air) will be addressed. Currently, the undeveloped land is beneficial in regards to these factors as none of these types of pollutants occur, for example the green site absorbs carbon dioxide emissions and gives out oxygen. The soil is currently farmed for natural needs; there is not a high population of people reducing the risk of spreading disease (an important factor at the moment) and generating light pollution as the existing light pollution is negligible. The building of 2500 homes will generate high levels of pollution which will damage the surrounding environment. Moreover, the average household of four has two cars, meaning an estimated extra five thousand cars on the road generating more fumes into our environment. According to the SMMT New Car Report of 2017, the average UK car emits 68.5 Metric tons of carbon dioxide per year. This will equivocate to 342,5000 (5000 multiplied by 68.5) additional Metric tons of carbon dioxide released into the surrounding area (not including additional carbon dioxide levels released by public transport vehicles) as a result of these 2500 homes. These extra cars will also further add to the issue of noise pollution as a result of this development.</li> </ul>	<p>policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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	<p>Increased Traffic.</p> <ul style="list-style-type: none"> <li>As previously stated, an estimated 5000 new cars will be on the surrounding roads of West Berkshire. Although this has been acknowledged in the proposed plan, the impact on traffic through the surrounding villages especially to the A34 has not been addressed. Currently there is already an issue with speeding throughout villages and this on-going problem will only be exacerbated with the additional vehicles. At the moment, many children and young adults dangerously walk to school across the highly busy roads. With the potential of more vehicles congesting the roadways, schoolchildren (in which numbers will increase due to the proposed 2 primary schools and 1 secondary school) and pedestrian lives will be put at risk. Furthermore, in 2016 West Berkshire council cancelled the school bus from Upper Bucklebury to Kennet School, in which the stated walkway was said to be down Long Grove, across the muddy fields and over the A4. This will mean that schoolchildren will be having to walk over a building site trying to reach their education. Meaning, their lives will yet again potentially be put at risk during the building of this development and subsequent to this due to the increased number of cars.</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li>As of the last West Berkshire Census in 2011 the average age population was stated to be around 35-64 years old, with roughly 20% aged 65 and over. This age category is often subject to health conditions and need the correct facilities to be cared for. The minor injuries unit does not hold the capacity for an extra 2500 households and nor do the 55 GP practices which provide for 550,000 patients already. This will seriously negatively impact existing patients with accessing these key services and also impacting the new residents. This will also be a similar problem for Dental Surgeries, the one</li> </ul>	<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for</p>

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	<p>Orthodontist practice in Newbury and any other health related services.</p> <ul style="list-style-type: none"> <li>• Sports Leisure Centre at Kennet School. This sports centre is used by many (pre COVID-19) in the surrounding area, and pupils of the school, for numerous physical well-being activities, by use of the gym, squash courts, swimming pool and dance studio etc. This facility would be incapable of supporting the influx of residents.</li> <li>• Leading on from this, the facilities at the current local secondary school in Thatcham are limited, despite the school managing very well, the out-dated buildings have not been supported by the council or invested sufficiently in. As a result of this, the school deals with energy inefficient buildings that leak and let heat escape and a limited infrastructure that is not sustainable or meets the needs of the school. Some examples regarding this include the following: <ul style="list-style-type: none"> <li>i) the school hall can only just fit two years in at its maximum capacity.</li> <li>ii) It has had temporary buildings in place for an prolonged amount of time, for example, the maths block. These temporary buildings are now used permanently and yet are unsuitable for coping with the number of students using them on a daily basis. The buildings are cold, under developed and unsuitable to be used for this amount of time. For example, during this coronavirus period, using these temporary blocks, which are used by each year group multiple times each week, have been incapable of keeping students warm after having to have efficient ventilation in the classrooms and due to the small corridors social distancing measures were a struggle despite teachers best efforts.</li> </ul> </li> </ul> <p>This must be prioritised first and taken into serious account as part of any future housing proposal around Thatcham. Other schools in the surrounding area of West Berkshire have far more developed and modern resources which would enable them to cope with this potential plan. However for some</p>	<p>additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>



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	<p>unstated reason Thatcham's secondary school does not. This lack of investment, and further impact of additional housing, will put strain on thousands of existing school children's education - who have already been subjected to a lack of advancement due to the pandemic. Even if a proposed secondary school and two primary schools are built, the small primary schools which too are at their maximum capacity already, and Kennet School will be expected to manage the strain of school children whilst the new schools are built.</p> <ul style="list-style-type: none"> <li>• To further compensate for the education lost due to the pandemic, benefit knowledge and understanding, and for entertainment purposes, libraries are a vital resource for the community. Thatcham's current library would not be able to serve more residents.</li> <li>• Thatcham Railway Service. Thatcham station has multiple connections, with main lines running to Newbury, Reading and London - which are all well used (pre COVID-19) by commuters in the local area. These train lines are also used as transport links for school children to get to school, whether it is going to school elsewhere in the area, or travelling to Thatcham and for workers. Therefore it is vital that the station is well maintained and equips the existing residents surrounding and the new residents. However, currently there is insufficient parking for current users. Moreover, this will have to be adapted as there is already a gradual increase in daily train arrivals from Reading to London (of 10.7% in 2017 sourced a published government document) in which Thatcham contributes to an average of 43 trains arriving in Reading a day.</li> <li>• The Level Crossing. Roads around the station often have tailbacks of traffic due to the safety barriers used (no objection to them here) however it already highlights the amount of congestion on the roads from the existing cars of the area. Whilst this is already bad for the environment, due to engines running whilst waiting, fumes from the additional number of cars (as stated before) would further increase this.</li> </ul>	

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	<p>Mental Health and physical well being. During the pandemic, it has been vital to exercise and break from looking at a computer screen for work. Getting outdoors has been proven to significantly positively impact mental health- which is an increasing problem throughout the UK and this should not be disregarded. Myself, and many others - both in Thatcham and Bucklebury - have used the surrounding fields for exercise both prior to and during the pandemic. The rural area has boosted mental health in focusing on the wildlife and scenery that surrounds it. The proposed plan indicates an approximation of 50% of the development kept as green space. However the plans do not state whether the private gardens of the new dwellings will be included in this. If so this would in no way compensate for the loss of green space. This would leave insufficient space for people of the surrounding area to utilize to support their physical and mental well being.</p> <p>Surface Water Run Off. In 2007 Thatcham experienced drastic floods with awful consequences that strained the surrounding economy, society and environment. Despite flood measures being put around Thatcham, these did not allow for 2500 extra homes, built on a slope, from which the water would run down the hill into Thatcham. Whilst surface water management schemes have been proposed, the landscape at the moment is permeable so therefore water is absorbed however once the land is developed it will become impermeable putting more water onto the A4, and as stated previously, putting Thatcham at a higher risk of flooding (which it is already subjected to due to its saturated ground.)</p> <p>Over-development</p> <ul style="list-style-type: none"> <li>The Thatcham area and its surrounding villages is already said to be growing faster than the rest of West Berkshire (according to the 2011 Census) and has continued growing since- by 11% between 2001 and 2011 censuses. With further development Thatcham runs the real risk of being over developed.</li> </ul>	

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	<p>Waste. With the population growth in Thatcham and this additional proposed increase in housing and residents, the proposal does not highlight how this not inconsiderable amount of household sewage will be dealt with. In 2019 there was a leak in the sewage works in Thatcham due to insufficient/decaying infrastructure, this problem will only multiply if more residents are proposed to live in the area. The effect of a sewage leak has drastic consequences for the environment yet again, so therefore I urge you to invest in the infrastructure in and around Thatcham to maintain its current population before considering such a large development.</p> <p>In conclusion of this, I am against this proposed development as my points above articulate.</p>	
Amelia Parker (lpr1208)	<p>I am writing to you today to inform you on why I and many other members of the community are against the building plans of 2500 new houses.</p> <p>I was devastated when I found out about the proposed plans to build this absurd amount of houses as I never thought that this farmland should be built on. As Thatcham already is densely packed with houses, it lacks beautiful nature that people can experience. However these farmlands allowed this as it almost felt like an escape from the noise and bustle of Thatcham. Especially due to recent events, the nationwide lockdown, more people have started to walk through these fields and see all different types of animals. I myself have seen different animals in these fields such as rabbits, badgers and deer's - and by building these houses it would destroy their habitat.</p> <p>Furthermore me, my family and my friends have very fond memories of times in these fields. Multiple snow days spent off school sledging down the hills and also late nights and early mornings watching the sunset and sunrise. I know that this may seem like a small reason against the building plans - but these small moments are precious and to build on this land it would strip future generations of experiencing the fun me and others have</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>

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	<p>experienced. When I asked my ten year old brother about his favourite memories in these fields he said that it was the multiple picnics we had there during summer, exhausting family walks and also the sky at night. Where we live in Upper Bucklebury at night the stars are extremely clear due to the lack of street lights. With this new 'mini town' being built it will affect light pollution and exterminate our view of the stars. When i used to live in Thatcham seeing the stars was an infrequent event, which i thought was normal, but now just by removing street lights i have realised it is not and i do not want other people to believe that stars only appear 2 or 3 days a week.</p> <p>Finally i would like to highlight the fact that these plans have been sprung on the local residents. A small amount of houses would require little input from local residents- however a new area (the size of Hungerford) being built would significantly change the dynamic of the town and impact us in different ways - these being traffic, unemployment and also a massive increase in population size.</p> <p>Thank you for taking some time to read my email and I hope you consider my reasons against the building plans.</p>	<p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>
David Fittall (lpr1210)	<p>I strongly object to the WBC's Thatcham North East development plans contained in the WBC Local Plan Review 2020-2037: Emerging Draft:</p> <ul style="list-style-type: none"> <li>• The size of this development, a 25% increase in the size of Thatcham, is large increase in population in one small area and will have a significant impact.</li> <li>• As a resident of Upper Bucklebury we will be directly impacted and it is not an understatement to say that a development of this size on our doorstep will ruin the village: <ul style="list-style-type: none"> <li>○ <b>The loss of countryside</b> from the development itself leading to a loss of the buffer between Thatcham and surrounding villages.</li> </ul> </li> </ul>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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	<ul style="list-style-type: none"> <li>○ <b>The increase in road traffic.</b> The road traffic model in the proposal appears optimistic to say the least in terms of the level of traffic increase that will be generated through Upper Bucklebury and onwards to the villages of Chapel Row and Bradfield. How can we set any store by a traffic model developed by those who are proponents of the scheme? The roads are simply not suitable for this increase in traffic. <ul style="list-style-type: none"> <li>▪ In Upper Bucklebury we already see an ongoing increase in traffic and an accompanying increase in the level of sustained and consistent speeding through the village which is not being addressed at all. This will be made significantly worse, to the point of being intolerable, by a development of this size on our doorstep.</li> <li>▪ This increase in traffic and the consequent increase in speeding traffic from this development will be a safety concern for residents, particularly children walking to Bucklebury School.</li> <li>▪ The increase in traffic from a development of this size will impact the quality of life and health of those living in Upper Bucklebury.</li> <li>▪ As I say this will ruin the village of Upper Bucklebury.</li> </ul> </li> <li>○ <b>Impact on local services:</b> the lack of provision for increased health services is a significant gap; both in terms of GP provision and the additional strain on the community hospital which in itself does not offer the range of services that are required by the existing population.</li> <li>○ Such population growth concentrated in one small area will have a detrimental impact on the surrounding countryside, wildlife and habitat – <b>this will impact the North Wessex AONB</b> and exacerbate the problems we already experience; such as the dumping of rubbish, illegal use of the common by 4x4 vehicles.</li> <li>○ This also smacks of <b>lazy planning by dumping so many houses in one place</b> and increasing the size of a town by 25%</li> </ul>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

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	<p>on one fell swoop with little consideration of the consequences for those people who already live in the area.</p> <ul style="list-style-type: none"> <li>o Much of West Berkshire is floodplain or AONB, and land has also been removed by the surprising scale of the extension of the safety zone around AWE. So why is it not the case that the number of houses the county must accept is proportional to quantity of developable land? <b>This is a flawed system.</b></li> </ul> <p>Given this is a plan being pushed by the Conservative controlled WBC, at the behest of policy put in place by a Conservative government this will certainly inform my future voting intentions at local and national level.</p>	<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed</p>

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		<p>development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus</p>

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		development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.
Louise Sturgess (lprlpr2291)	I am writing to express my extreme concern over the proposed Thatcham development. This housing estate will take away a vast amount of our countryside and destroy wildlife, which we desperately need to preserve at all costs. The proposal is also for this development to be built on greenbelt land which is disgraceful. In addition to destroying this beautiful countryside, the development will create more traffic, more pollution and put even more pressure on local services in the area, such as schools and GPs, which are already severely stretched. West Berkshire Council has failed to invest in these services and the area over the years which means that these services will also not be able to support an additional 2,500 homes and families. This development would be extremely detrimental for both Thatcham residents, the environment and our wildlife and I urge you to reconsider.	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>



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		<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>

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		strategy which will set out how priority habitats and ecological features will be protected and enhanced.
Robyn Fittall (lpr1211)	<p><u>I object strongly to the Thatcham Development</u></p> <ul style="list-style-type: none"> <li>• The size of this development, a 25% increase in the size of Thatcham, is a large increase in population in one small area and will have a significant impact on our village.</li> <li>• As a resident of Upper Bucklebury, we will be directly impacted by a development of this size on our doorstep and it will ruin the village: <ul style="list-style-type: none"> <li>○ <b>The loss of countryside</b> from the development itself leading to a loss of the buffer between Thatcham and surrounding villages.</li> <li>○ <b>The increase in road traffic.</b> The road traffic model in the proposal appears optimistic to say the least in terms of the level of traffic increase that will be generated through Upper Bucklebury and onwards to the villages of Chapel Row and Bradfield. How can we set any store by a traffic model developed by those who are proponents of the scheme? <ul style="list-style-type: none"> <li>▪ In Upper Bucklebury we already see an ongoing increase in traffic and an accompanying increase in the level of sustained and consistent speeding through the village which is not being addressed at all. This will be made significantly worse, to the point of being intolerable, by a development of this size on our doorstep.</li> <li>▪ This increase in traffic and the consequent increase in speeding traffic from this development will be a safety concern for residents, particularly our children walking to Bucklebury School.</li> <li>▪ The increase in traffic and pollution from a development of this size will impact the quality of life and health of those living in Upper Bucklebury.</li> <li>▪ Upper Bucklebury will lose its identity as a Village.</li> </ul> </li> </ul> </li> </ul>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements. Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity</p>

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	<ul style="list-style-type: none"> <li>○ <b>Impact on local services:</b> the lack of provision for increased health services is a significant gap; in terms of lack of GP provision and the extra strain the small hospital we have is already not fully suitable for the needs of the people who currently reside in Newbury and Thatcham.</li> <li>○ Such population growth concentrated in one small area will have a detrimental impact on the surrounding countryside, wildlife and habitat – <b>this will impact the North Wessex AONB</b> and exacerbate the problems we already experience; such as the dumping of rubbish, illegal use of the common by 4x4 vehicles.</li> <li>○ Lazy planning by dumping so many houses in one place and increasing the size of a town by 25% is extremely inconsiderate for those people who already live in the area.</li> <li>○ Much of West Berkshire is floodplain or AONB, and land has also been removed by the surprising scale of the extension of the safety zone around AWE. So why is it not the case that the number of houses the county must accept is proportional to quantity of developable land?</li> </ul>	<p>and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Michael Morgan (lpr1212)	<p>I am writing in relation to the West Berkshire Council consultation on the proposed development for Thatcham North East.</p> <p>I lived and worked in Thatcham and Upper Bucklebury for 33 years and have a detailed knowledge of the population and topography.</p> <p>I am aware the proposals have excited considerable local interest, both in Thatcham and the surrounding villages.</p> <p>My concerns include:</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers</p>

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	<ol style="list-style-type: none"> <li>1. The significant reduction in distance between Upper Bucklebury and Thatcham, eroding the tree space between and resulting in a coalescence of two distinct communities.</li> <li>2. Long Grove in Upper Bucklebury is a bridleway which leads to Colthrop Manor and Crookham Manor: <ol style="list-style-type: none"> <li>a) Long Grove was originally the principle road through what is now Upper Bucklebury, between Crookham, Colthrop and Bucklebury village (Lower Bucklebury) and may contain archaeological artefacts requiring a suitable survey.</li> <li>b) The northern margin of the proposed estate is much closer to the centre of Upper Bucklebury than the Broadway in Thatcham. There will therefore be a significant increase in both pedestrian and cycle use along what is now a part-muddy, part-gravel track. Long Grove should ideally be adopted and upgraded.</li> </ol> </li> <li>3. The increase in traffic will necessitate new traffic calming measures, particularly along: <ol style="list-style-type: none"> <li>a) Burden's Heath and Broad Lane as the village will become more of a rat run between north Newbury and Reading.</li> <li>b) I am especially concerned at increased pedestrian and cycle use of the Harts Hill Road between the end of the permissive path (near the southern border of Burden's Heath Plantation and Wimbles Wood) and the centre of Upper Bucklebury. There really will be a strong case for the construction of a pavement along this section of the road or liaison with the landowner to extend the section of permissive path.</li> </ol> </li> <li>4. Medical provision: both the Burdwood Surgery and Thatcham Medical Practice are 'bursting at the seams' and Chapel Row</li> </ol>	<p>to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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	<p>Surgery will not want to take on the proposed 2,500 houses. Adequate and safe provision of primary care services will be essential to resolve before approval.</p> <p>5. Woodland biodiversity in Hart's Hill Copse, Long Grove Copse and Blackland's Copse will be permanently damaged. If you surround a wood by houses, you prevent the movement of many creatures (hedgehogs etc) and lose rarer species (nightingales etc). There will also be an increase in disruption on Bucklebury Common, quad bikes, fly tipping etc.</p> <p>6. Increase in noise, air and light pollution.</p> <p>7. It is particularly sad that to me that a small corner of uniquely unspoilt countryside between Colthrop Manor, Ouzel Gully and Kent's Down Gully will be lost forever beneath a swath of concrete.</p> <p>8. This is in essence a hillside development, breaking out of the valley, will a resulting impact out of proportion to its already disproportionately enormous size.</p>	<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thattham. It is in close proximity to a range of services and facilities, including the train station. Thattham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thattham requires.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>



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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity</p>

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		<p>and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Victoria Watson-Campbell (lpr1215)	<p>I would like to object to the proposed development because:</p> <p>The infrastructure is not adequate. There are insufficient: Schools, Doctor's Surgeries, Council services.</p> <p>Also:</p> <p>The Roads are clogged with traffic as it is and become totally gridlocked should any incident happen for example on the M4 when the A4 tails back to Newbury with a long queue of cars and lorries. The increase in numbers of cars adds huge amounts of pollution and particulates which lead to</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the</p>

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	<p>increased numbers of people suffering with heart disease, cancers, asthma and copd which ultimately places a huge burden on the beleaguered, underfunded and struggling health service</p> <p>The huge numbers of population in the South causes potentially a reduction in quality of life. This overpopulation in the South of England does nobody any favours and the housing needs to be evenly distributed throughout the country.</p> <p>There are huge numbers of people in their cars at weekends and out and about. Everywhere is oversubscribed and this causes aggression and conflict over competition for limited resources. It also does not help with the spread of disease and pandemics like Covid which are set to soar in the near future.</p> <p>I therefore object to the 2500 shoddy houses being proposed and will be contacting my member of Parliament to voice my objections!</p> <p>And will bring this to the attention of various TV programmes.</p>	<p>highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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		The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.
Barbara Grey (lpr1219)	<p>I understand that West Berkshire Council (WBC) have published a proposal to build 2,500 houses to the North and East of Thatcham.</p> <p>How can such a proposal even be considered? Particularly with such short notice and in the middle of a pandemic. How is it that council-tax payers whose properties abut the land you propose to build on have not been notified, let alone consulted?</p> <p>Thatcham has already been allowed to spread over a great deal of previously farmed land and has outgrown many of the services required - schools, doctors' surgeries, public transport, highways etc., not to mention provision of social services and amenities. The railway station could not possibly manage extra travellers, and the car parking facilities are already insufficient. This, in addition to the enormous delays and traffic jams caused by the level crossing. How are the extra 5,000+ adults going to get to work, if, indeed, employment opportunities exist - and where will their children go to school?</p> <p>The eastern boundary of your proposed development is the stream which forms the western boundary of our farm and which runs into the River Kennet. We have lived in Midgham since 1985 and have farmed and cared for 60 acres each side of Coxs Lane since 1994.</p> <p>Since 1994, we have:-</p> <ol style="list-style-type: none"> <li>1. stopped the use of all chemicals</li> <li>2. planted all of the new hedgerows</li> <li>3. converted over-used arable fields to wild flower meadows</li> <li>4. carefully managed areas of ancient woodland.</li> </ol>	<p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that "We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

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	<p>5. Maintained footpaths and fitted kissing gates and steps where necessary.</p> <p>Our efforts to look after the land in an environmentally sensitive way have led to the return of many bird species and animals to, what is now, a wildlife haven.</p> <p>There is no doubt that such close, high density development will have a negative impact on this area and our hard work over the past 27 years will have been wasted.</p> <p>How can your proposal possibly be in line with the government's green agenda? Farmland is an increasingly important resource. We are being encouraged to eat less meat and since Brexit, we must produce more of our food in the UK. Everyone is now aware of the importance of fresh air and green, open spaces to peoples' mental health. Since the start of the pandemic, we have seen a considerable increase in the numbers of people using the well established footpaths on our land - paths which lead on to, and through the land you propose to develop.</p> <p>I appreciate that more housing stock may be required, but there are many more suitable solutions than building on virgin farmland. As more people work from home, office blocks will become available which could be converted, and the continued demise of the high street will lead to large retail premises which could also be used for housing. And there are pieces of land within the current Newbury/Thatcham conurbation which could be utilised.</p> <p>Or it the council's intention to join Newbury, through Thatcham, Midgham, Woolhampton, Aldermaston and Theale, to Reading?</p> <p>Huge developments on greenfield sites are easy solutions for planning authorities. Landowners and builders are keen to make money and councils can cut deals to be seen to supply "affordable" housing. Developers are</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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	<p>renowned for prioritising private housing over provision of affordable housing, infrastructure and community facilities, all of which should actually take first priority.</p> <p>It is poor, lazy council policy and the residents who pay their council taxes to West Berkshire Council deserve better.</p> <p>I appreciate that more housing stock may be required, but there are many more suitable solutions than building on virgin farmland. As more people work from home, office blocks will become available which could be converted, and the continued demise of the high street will lead to large retail premises which could also be used for housing. And there are pieces of land within the current Newbury/Thatcham conurbation which could be utilised.</p>	<p>and lifestyle choices will be important elements of the overall transport plan.</p>
Mr Kastelnik (lpr1221)	<p>I strongly object to the building of 2500 houses on farmland between Upper Bucklebury and the A4 and Floral Way, which will be an overdevelopment in the Thatcham area, this will have an impact on traffic and pollution, loss of rural countryside and green belt.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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Patricia Barclay (lpr1223)	<p>I wish to register my objection to the possibility of housing development to the north east of Thatcham.</p> <ol style="list-style-type: none"> <li>1. This is an area of outstanding natural beauty.</li> <li>2. Floral Way is a definitive boundary between an Urban settlement and Countryside and should be retained as such. There is no such boundary between Thatcham and Newbury and therefore it is one huge sprawl which has nothing to commend it.</li> <li>3. if housing is allowed there would obviously be more hard standing and flooding could well be a possibility down hill to Thatcham after heavy rain.</li> <li>4. We must keep our farm land to feed our people, otherwise we will have to import from overseas.</li> <li>5. Harts Hill is a narrow country road and would be quite unsuitable for an increase in more traffic, which would further disturb the village of Upper Bucklebury.</li> </ol>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site</p>

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		<p>will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>



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		packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
John Stephenson (lpr1235)	<p>I wish to object to the proposed 2500 house development at North Thatcham. The grounds for my objection are:</p> <p>The plan basically adds a development the size of Hungerford to Thatcham, but with no regard to making it anything other than a massive dormitory.</p> <p>2500 new homes and associated infrastructure will generate a massive increase in traffic on the rural roads of Bucklebury. There is no way to plan to control such a great increase in traffic up Harts Hill to the parish.</p> <p>Loss of Thatcham Green Belt as set out in the West Berks policy statements. Building up to the edge of the AONB is against the letter and spirit of the West Berks policy as there will be no transition land between new urban development and the AONB</p> <p>Lack of infrastructure - a rolling development plan allow developers and the council to avoid adding GP surgeries, sports facilities, play areas, small shops and minor commercial premises.</p> <p>Light pollution to Upper Bucklebury</p> <p>Lack of a plan to review archaeological sites in the proposal, for example, Longrove and known Bronze Age sites</p> <p>The proposed area includes some very steep slopes, how will this be dealt with?</p> <p>There will be a massive increase in air pollution</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant</p>

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	<p>The development is within the AWE Yellow Zone</p> <p>The development increases flood risk, as noted by Thatcham Town Council</p> <p>Ref West Berkshire Policy SP7 Quality Development - there is no reference to meeting this policy</p> <p>The development is on high grade agricultural land, this is counter to established West Berks policy</p> <p>Massive loss of biodiversity in the area, once again counter to established West Berks policy</p> <p>There is less demand for housing - leaving the EU has led to higher emigration. Lower income due to the pandemic has resulted in fewer people wishing to purchase a house.</p>	<p>impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents</p>

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		<p>including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory</p>

Respondent (with lpr ref)	Response	Council Response
		<p>text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>The necessary bodies have been consulted upon regarding the allocation and the implications of AWE.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The</p>

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		<p>policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Rosalind and Peter Cane (lpr1236)	<p>We wish to express our objections of the proposed building of 2500 houses between Upper Bucklebury and the A4.</p> <p>The impact on the rural environment is unacceptable.</p> <p>It will destroy vast amounts of habitat which are vital to the welfare of animals not to mention taking out Trees and Hedgerows. It seems</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>protecting the environment and planet goes out the window when money is involved.</p> <p>If all 2500 houses have at least 2 cars each that is an extra 5000 plus cars on already congested roads. So Bucklebury and surrounding villages will become even more of a rat run for cars trying to avoid the A4.</p> <p>There is also light pollution from this development and noise which will have a huge effect on the rural community.</p> <p>If this goes ahead it will open up the way the development all along this stretch until we join up with Reading and become one big Urban Town.</p> <p>We understand the need for more housing but this is on a massive scale in such a tiny space apart from the people who will benefit from the sale of this land the rest of the rural countryside will have no benefit whatsoever</p> <p>It is not a case of not in my back yard. We have lived here since the 70s and have seen many changes some good some bad but most with an eye to keeping the precious rural countryside intact.</p> <p>We must preserve what we have here because once it has gone its gone and in years to come people will look back and wonder how this was allowed happen</p> <p>THIS DEVELOPMENT MUST NOT GO AHEAD</p> <p><i>[Sent 2/2/21]</i></p> <p>Having sent an email yesterday about our objection to this scheme I wish to add that why can't these houses be built on Greenham Common where it is flat at least with better road access. This morning our water pressure was</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

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	<p>once again really low so what sort of effect will 2500 houses impact on the water supply.</p>	<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR),</p>

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		<p>which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements. All sites which have been submitted to the Council for allocation have been considered. A site must be available, achievable and suitable to be allocated.</p>
Helen Relf (lpr1237)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons:-</p> <p>1           The vast majority of residents in Upper Bucklebury are against this development and many have already registered their objections but as no information has been sent out by WBC many are not aware of the application. I feel that the consultation period should be extended and that ALL residents should be formally written to.</p> <p>2           This development would, effectively, join Upper Bucklebury to Thatcham thus effectively removing the rural aspect of the area. As it is cited in the Bucklebury Vision and Plan to maintain a strong green belt, which was approved and agreed with WBC, it should be considered as supplementary planning consideration. On page 22 of WBC documentation</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site</p>



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	<p>regarding planning “<i>particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.</i> So this new development is in contradiction to WBC’s own intentions.</p> <p>3 A previous application was rejected by the Secretary of State in 2017 (500 houses at Siege Cross) so why is WBC now considering this site in light of previous objection. What has changed and, knowing this has been refused once why have funds been spent so far? At least part of this site was deemed Not Developable in 2013 – what has changed?</p> <p>4 It is a massive over development of the countryside and will have a significant impact on traffic in the area, especially on the route into Thatcham and Newbury and towards the station, which are already heavily congested at peak times.</p> <p>5 Traffic, and speeding, through Upper Bucklebury is already of a major concern due to the Primary School and with an increase of 10% this will only worsen the situation. Hart’s Hill is not suitable for extra pedestrian or cycle use.</p> <p>6 It will completely surround the Crematorium in Thatcham, which was placed away from residential properties and has constraints placed on it.</p> <p>7 This development is the size of Hungerford yet there is no infrastructure in place, no town facilities, no doctor’s surgery (on the plans I have seen). Hungerford with almost the same number of houses has school, a high street, surgeries, a large carpark – there is nothing in this development. Thatcham surgeries are already over-subscribed and I doubt Chapel Row would be able to accommodate extra patients.</p>	<p>will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process. The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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	<p>8 Will there be a full archaeological survey on the area bearing in mind that there were skirmishes and camps in the area during the civil war in 1644.</p> <p>9 The damage to the local flora and fauna in the area would be immense not to mention the light, noise, and air pollution, plus the flooding. Would the developers implement flood alleviation measures?</p>	<p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>

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		<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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		<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Joanna Brass (lpr1241)	<p>I and my family are very concerned about the proposed development of the beautiful green belt land between Upper Bucklebury and the A4/Floral Way. A development of 2,500 houses in the green spaces of Thatcham seems unreasonable.</p> <p>We have two main reasons: (i) concern for the existing under-invested Thatcham town and (ii) loss of the beautiful and locally important green belt.</p> <p>I'll start with <u>the green belt issue</u>. Our first reaction to the news of the development was of complete surprise, as it runs contrary to what we understand to be the Central Government's most basic national planning policy: to preserve green belts! The fundamental aim of the policy</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

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	<p>as we understand it is to prevent urban sprawl by keeping land permanently open.</p> <p>It is essential to allow the land in question, or as much of to as possible, to remain as green belt to (i) check the unrestricted sprawl of Thatcham up into the area of outstanding natural beauty and rural character that is Bucklebury Common and its surrounding area, (ii) stop Thatcham merging into Upper Bucklebury, (iii) assist in safeguarding the countryside from encroachment, (iv) preserve the setting and special character of the hamlets and small villages in the Bucklebury area, and (v) assist in urban regeneration, not just in Thatcham but also in Newbury, by encouraging the recycling of derelict and other urban land.</p> <p>Our decision to live in the woods near Midgham/Upper Bucklebury was heavily influenced by the rural character of the surroundings including the existing green space separating it from Thatcham (including the part that it is now proposed to build on). We enjoy it at least weekly, regularly walking our dogs on various footpaths in the vicinity. To change the area in the way proposed is entirely unacceptable. It would mean the loss of a much loved green space, visually damaging the existing landscape around the currently undeveloped side of Floral Way, it would mean the loss of a much loved rural landscape, disrespect the idea of a settlement boundary between Thatcham and Bucklebury, trigger the loss of trees, hedgerows and other vegetation that are essential for wildlife, and represent the over development of Thatcham.</p> <p>Our <u>concern for Thatcham</u>. We do not live right in Thatcham, but consider it our main town and in "normal" (ie not lockdown) times we are in and out of it multiple times a day. There seems to us to have been a failure over many years to invest in the Thatcham area and its most basic infrastructure - the town centre, roads, public transport, schools, GP surgeries, leisure facilities, maintained green spaces, youth facilities, care support and community centres are all under strain and all need work. These are all needed for our community to prosper and have all been neglected over a prolonged period of time. A new development will not fix any of this. Nobody who truly knows</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>Thattham would believe that the town could support an expansion of 2,500 new houses.</p> <p>The transport links were at full capacity (pre-Covid/lockdown) with terrible peak time congestion on the A4. The last thing the town needs is thousands of extra cars compounding these problems - on top of competing with the HGV's from the industrial area and distribution centres which already attract the massive lorries and the pollution they bring.</p> <p>We note that WBC's strategy of 2012 identified that, after a period of rapid housing growth, the infrastructure in Thattham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration nor significant new facilities, all we are aware of is the spending on the flood defence work; so presumably the (what seemed to us logical and sensible) conclusions of 2012 still stand?</p> <p>The focus in and around Thattham should continue to be on building a strong community, and making Thattham a safe, healthy and great place to live, where everyone has access to the services they need. The idea of a country part-type development linking Thattham up into the surrounding AONB is a good one - although I'm not sure it is actually necessary as the walkers, cyclists and family of Thattham are already well evident up and around the green belt and extending all the way up into the quiet lanes of Bucklebury Common on fine weekend days during lockdown. It serves as a beautiful green/rural/woodland escape for many from the urban streetscapes of existing Thattham and accessibility does not actually seem to be much of a problem, judging by the increase in (foot) traffic. I would argue that it serves to benefit the physical and mental health of Thattham residents as it is. Perhaps some public transport options up Harts Hill Road would help make it more accessible - in other countries they might run a street tram up into such areas on weekend days, for example.</p> <p>There are so many ways to make Thattham a better place to live, without building over the very green spaces that its residents already use to escape into, or even just breathe a little more deeply as they enjoy the views from</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and</p>

Respondent (with lpr ref)	Response	Council Response
	their cars along the A4 and Floral Way. I sincerely hope that sanity prevails in this matter.	walking network to travel, including to Thatcham train station.
V E Coulson (lpr1247)	<p>I wish to object in the strongest terms to the proposed development of the above site for the following reasons.</p> <ol style="list-style-type: none"> <li>1. The proposed development is situated on the side of a valley, outside of any settlement boundary in an area of greenbelt land consisting of rolling hills and farmland. The development would be extremely visible from a number of viewpoints, most notably from the southern side of the valley and would change the overall vision of the area to an urban one as opposed to that of a small town contained within a wider countryside context.</li> <li>2. Bucklebury Vision and the Bucklebury Plan are documents approved and agreed with West Berks Council. Despite their being accepted as constituting 'supplementary planning consideration' they are not mentioned in the WBC documentation or appear to have been taken into consideration.</li> <li>3. If the proposed development were to proceed the gap between it and the village of Upper Bucklebury and the boundary of the AONB would be negligible and insufficient. Upper Bucklebury would effectively join Thatcham thereby losing its identity and seriously compromising the rural aspect of the area. At the time of the AONB boundary being set it had to meet several criteria set by Government. Several of these, including those relating to tranquillity and wildness would be completely compromised if the existing 'buffer zone' was eroded.</li> <li>4. 2500 extra properties would result in a large volume of extra traffic not just on all of the main roads but also the country lanes in and around the surrounding villages. WBC documentation does not address this. Country lanes are known to be the most dangerous roads to drive on and it is inevitable that any increase in traffic is going to make them even more hazardous for motorists and non-motorists alike. This is at odds with the WBC Local Transport Plan 2011 - 2026 'Active Travel Strategy' and more especially with the Bucklebury Quiet Lane Scheme which was initiated by WBC and supported by local residents.</li> </ol>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR). The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be</p>

Respondent (with lpr ref)	Response	Council Response
	<p>5. I only became aware of this proposed development in the New Year. WBC should have actively engaged in a community consultation process before spending so much of tax payers money on such a lengthy document effectively presenting it as a fait accompli and giving such a limited amount of time for any community response.</p> <p>6. Bucklebury Common is home to many species of wildlife and flora and fauna, many of them increasingly rare. There is already a problem with off-roading, litter and fly tipping and any increase in motor vehicles on the roads, or use of the Common as a 'playground' rather than a place for quiet enjoyment and appreciation will be to the detriment of its fragile ecosystem.</p> <p>7. I have limited my comments to some of the impacts of the proposed development on Upper Bucklebury where I live but the implications for Thatcham are also huge and damaging for that community. The proposal is over development of Thatcham which currently struggles to serve its existing residents. There is insufficient parking for the town and schools and doctors surgeries are over stretched. The railway station and level crossing is a bottle neck with limited parking and almost full train services at peak times. Flooding is an on-going issue and building on the slope to the north of the town would massively increase the risk of heavy rain overwhelming the drainage system to an even greater degree than occurred in July 2007. Indeed, the 'Flooding in Thatcham' report written by Sue Everett, an independent consultant ecologist, said that it would be "utter madness to build on that slope". Sadly, climate change means that once 1 in 100 years events are happening far more frequently and it would be irresponsible to put property in an area of known risk.</p> <p>Please take the above comments into account when coming to a decision on the proposed development.</p>	<p>adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.' The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>
Maria Kelly (lpr1242)	I wish to object to WBC Policy SP17, the proposed major development to the north-east of Thatcham that would put a huge number of new houses on the	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic



Respondent (with lpr ref)	Response	Council Response
	<p>farmland / hillside stretching up from the A4 and the Floral Way. My reasons for objecting are these:</p> <ol style="list-style-type: none"> <li>1. Traffic – there is already an unsafe amount of vehicle traffic using the narrow and twisting lanes through the villages of Upper Bucklebury, Cold Ash etc. These lanes in most cases have no pavements and yet are used extensively by pedestrians, cyclists and horse-riders. The addition of a huge new housing complex at the foot of Harts Hill would obviously add significantly to the volume of traffic on these lanes and worsen an already dangerous situation. And as for the main routes, the A4 and Floral Way, they and the Thatcham level crossing are already unpleasantly busy and congested, even in lockdown. They would simply become even worse, then encouraging more motorists to look for alternative routes through the country lanes.</li> <li>2. Flood control – this area has suffered a lot in recent years from flooding, and climate change suggests we can expect increasing levels of rainfall. I cannot see how the addition of a further huge built-over area could possibly do anything other than make the situation worse.</li> <li>3. Suggestion that it would regenerate Thatcham town centre – it's very unlikely that people in the new houses would walk into Thatcham for their shopping, the distance alone being an issue but then with the uphill climb back home on top of that. They will get in their cars and drive to Newbury or Reading, or to one of the retail parks.</li> <li>4. The countryside and our AONB – I feel particularly concerned at the disregard that WBC's proposal seems to show for the well-being of the local countryside. Although the new development would not sit within the boundary of the AONB, it would be so close as to have some very significant and detrimental effects upon it. There would be a huge increase in the numbers of people walking and cycling on Bucklebury Common, to the detriment of the flora and fauna (we have already seen that effect with the increased footfall brought about by the coronavirus restrictions on doing</li> </ol>	<p>by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>

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	<p>pretty much anything else). There would be unavoidable increases in levels of noise and night-time lighting, both impacting on the wildlife and especially on nocturnal creatures. And inevitably an increase in pollution to the air.</p> <p>5. Wasteful use of land – the development would use up a large area of high-quality farmland, which seems a disgraceful waste of this valuable resource, especially when the argument for more houses is forecasts of an increasing population. That population needs to have food grown for it, in fields like the ones that WBC proposes building over. Furthermore, we are increasingly urged to reduce carbon footprints by buying UK-produced and, even better, locally-produced items, including foodstuffs. Reducing West Berkshire's amount of good-quality agricultural land seems to be a move in the opposite direction.</p> <p>6. Housing needs – finally, it has to be asked whether those forecasts of West Berkshire's future housing needs are still accurate and relevant in the aftermath of Brexit and the coronavirus episode. The long-term economic and social consequences of both those major events are uncertain, but pointers seem to be towards less growth, less inward migration, a lessening need for workers to concentrate in the south-east of the country etc. I believe it would be irresponsible of WBC to move forward with any major infrastructure changes at this time, but most especially with large-scale housing projects such as in its SP17 proposal.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>When determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Joseph Essex (lpr1244)	<p>I am writing to you today to express my concern and distress at the proposed development of 2500 new homes (about 25% of the existing small town) being built on green spaces near to Thatcham. I live in the very nearby village of Hermitage and fear this new development is of a scale far too great for the location chosen.</p> <p>I understand the need to build new and affordable homes as the population increases, as everyone should have a place to call home. However, I as well as many others, strongly believe that this proposed development is not the right solution to the issue for many reasons. I explain 4 briefly below:</p> <ul style="list-style-type: none"> <li>• <b>Loss of green spaces and the Thatcham green belt.</b> The chosen location for these home is on green land which is used by many people for walks which improves their mental health and physical fitness. The vast majority have used green spaces as a refuge from our homes during lockdown over the past year – removing this will only be detrimental. Furthermore, thousands of animals and plants call these places their home, the thousands of species will either have to relocate or be destroyed in the process of building. There are many spaces which are not considered green-belt land and would be much more suitable to build upon.</li> <li>• <b>Overdevelopment.</b> Some would say that Newbury and Thatcham have already merged into one very large town and this would increase that further if the proposed development takes place. Changing more natural spaces</li> </ul>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside</p>

Respondent (with lpr ref)	Response	Council Response
	<p>such as green fields and laying them with concrete and tarmac is not suitable for the location proposed and will be harmful in many ways.</p> <ul style="list-style-type: none"> <li>• <b>Further stretching Thatcham’s infrastructure.</b> Even though I don’t live in Thatcham, when travelling through at various times of the day, it is obvious to see that the shops, schools and especially road network, are at their limits. Increasing the number of residents in this village by over 2500 will increase this problem ten-fold.</li> <li>• <b>Increased pollution.</b> With increased numbers of people always comes the inevitability of increased pollution, though building entirely new roads and developing over green land will be worse than if we were to develop land that has already been used.</li> </ul> <p>In conclusion, I do understand the need to build homes to house our increasing population, yet I hope you consider the valid points I and many other have stated about why this is not the right way to go about it.</p>	<p>Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements. Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation</p>

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		18 consultation to strengthen the Council's policy on pollution.
Jason Allum (lpr1246)	<p>Having looked through the reports issued for the proposed future expansion of Thatcham, I am very concerned that the report has not considered the environmental consequences of the development, and especially the size of the intended project. We appreciate that there is a requirement for some development, but this scope seems to be a knee jerk reaction to cancellation of developing the Greeley site and has been rushed through with little consideration to the district that West Berkshire Council are supposed to represent. It has been insinuated that this is the only suitable site due to: restrictions of developments on Flood plains; the limitations of the AONB; and the restrictions of building around nuclear production and storage facilities. This is clearly wrong. Some housing needs to be built in the vicinity but a development on this scale is unacceptable and will be an environmental disaster, the reasons for which I have laid out in the text below after studying the submitted draught.</p> <p>Firstly, there is National funding available for the building of the railway bridge at Thatcham. This should be considered a priority before any development is even considered and would allow reasonable expansion on the southern side of the town and open this important strategic link to the south of Newbury.</p> <p><b>1. Housing Numbers</b> The projected figure of housing required in West Berkshire is debatable. It is known fact that the number of places at Primary Schools are undersubscribed; this can only be due to a reduction in numbers of the younger generation. This is backed up from the graph on the West Berkshire Website, the actual population curve is flattening. This single fact seems to have been ignored. The demographic of the population is therefore, obviously changing and this needs to be taken into account in any calculation of the required housing.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513</p>

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	<p>As the cost of housing in the South is expensive the older generation have and will continue to move west, downsize and live comfortably off the proceeds and their retirement plans which again reduces the requirement.</p> <p>Wilson homes development at the Racecourse is committed to provide 1,500 dwellings over a ten-year build. This figure of sustained development seems to be had been totally ignored. What is more, it would appear that they have been constructed on the Kennet flood plain. However, evidently this is not the case, as the authority has given full approval and consent as the location was situated on well-draining gravel beds. This precedence opens a lot more areas that could be used for housing, rather than the restricted options illustrated in the proposed plan which is both misleading and ambiguous. Building can take place within the valley floor and have the advantages of the current infrastructure. Importantly the visual impact is very much reduced than building on the northern slopes of Thatcham and the area adjacent to the AONB.</p> <p>Brexit has reduced the number of Europeans legally seeking work and citizenship, and indeed, there has been an exodus of casual labour in all regions. Covid 19 will alter the shape of our county and the nature of future employment. This will particularly impact the younger generation seeking employment and the lure of jobs not only in our area but nationwide.</p> <p>Importantly most of us, particularly those making these important decisions, will have gone to their maker and will not be around in 2036. We have seen that the younger generation will not tolerate environmentally damaging decisions. Greta Thunberg and her followers are just the tip of an iceberg of a younger generation with valid concerns on the environment and green issues. Our legacy is to look long-term and provide an environment suitable for future generations not a short-term reaction to ill-advised imposed quotas.</p> <p><b>2. Surface water</b> I have real concerns of the actual predicted runoff of surface water. There has been a lot of money spent on flood defences and</p>	<p>dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR</p>



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	<p>this will be completely wasted if houses are built on the surrounding land without any consideration of the amount of surface runoff, especially since the entire site proposed is on a considerable slope. There is no reservoir shown on the plans or anything like the attenuation that is required. Without the correct attenuation this will be an environmental disaster once again threatening the households in Thatcham. The severe storm of 2007 was a wakeup call for all and these lessons need to be learnt.</p> <p>The average dwelling has a roof area of around 270 m<sup>2</sup>. If you add on the garage, sheds, hard standings, car parking, pavements etc., this figure increases to approximately 420 m<sup>2</sup>. This does not allow for the roads or any infrastructure works, schools, playgrounds and warehousing development etc.</p> <p>Assuming the worst-case storm figure, of around 100 mm/hour (however it is generally agreed that this figure is now too low, as warmer air, due to global warming, is able to hold substantially more water), this results in a conservative figure of 42 m<sup>3</sup> per dwelling/storm. Recently we have seen consistent storms lasting in excess of 48 hours. Taking this into account, and working on only six hours, the amount of water generated off of 2,500 dwellings is over 630,000 litres (630 tonnes) of runoff! (This is hard to visualise but in round figures about 10 double decker bus loads every 6 hours). If this is allowed to drain down the hill to the Thatcham and the Kennet catchment it is obvious that this will cause extensive flooding. If this is mitigated locally the problem is just shifted further downstream which is just environmentally irresponsible.</p> <p>The hydraulic force of this water alone will literally burst drainage pipes if this matter is not carefully engineered and enforced. I have seen first-hand what occurred in South Milford and the devastating affect it had on the community.</p> <p>It must be remembered that this is additional surface water runoff and does not take into account the ephemeral water course, which is such a dominant</p>	<p>is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p>geological feature of the proposed site. 2.51 actually states “<i>There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling</i>”. The document however fails to identify the underlying rock strata of Reading Beds clays which promotes rapid runoff as anybody who has carried out the standard percolation test on this material will substantiate. I will challenge anybody to prove otherwise.</p> <p>The report also highlights that this area is bisected by numerous gullies. It is not rocket science to realise that the increased runoff this will channel this water and make this unsuitable for development. This is particularly prevalent to the area at Colthrop Manor and in the area known as the “Big Gully”.</p> <p><b>3. Preservation strip</b> The proposal includes a “wooded gullies preservation strip at higher levels.” However, given the size of the development, this strip will have limited impact; it is not large enough and houses will still be built at a high level, and close enough, to impact onto Bucklebury Parish. This is mentioned in more detail in the section later in relation to the Impact on Bucklebury.</p> <p><b>4. Visual Impact</b> Reading through the report there is some confusion and ambiguity on which levels are consider acceptable. Much of the proposed development actually exceeds the 100 m contour especially around Harts Hill and towards Long Grove Copse. I have been informed by Bucklebury Parish Council that the development will all be below 100 m. This is false. Most of the development with be 20 -30 m above the existing building, in old money 60-100 feet. It will be imposing for the existing residents and be extremely visual, particularly from Greenham Common and the high ground to the south. Anyone who has actually looked at this vista will have noted the Henwick Driving range and this is noted at being at 90 m. The majority of proposed housing will be at this level and above – highly visible.</p> <p><b>5. Thatcham Services</b> Currently there is an oversubscription for the medical facilities in Thatcham and Bucklebury. The surgeries in both locations are</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered</p>

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	<p>struggling to cope currently with existing levels let alone a predicted figure of 6,000 population increase. The Dentist have the same problem.</p> <p>The plan shows no figure in the dwelling development that triggers the building of new secondary schools. The Kennet School is currently oversubscribed, is the plan thus to move the catchment areas and send all the Bucklebury, Cold Ash, Woolhampton and Chapel Row village children to Compton?</p> <p><b>6. Thatcham Centre</b> Thatcham centre is really not an economic hub. The post office is underfunded and we have lost three major banks, which too many of us was an essential requirement. Waitrose, the Cooperative supermarkets and the library are the only real draw from the immediate hinterland for many, and these are already working at full capacity. These services need to be improved with an economic proposal prior to any proposed development.</p> <p><b>7. Siege Cross</b> It seems inconceivable that the Siege Cross area was rejected under appeal and is now included in the overall plan. What is the point of a ruling if it is now totally overlooked when under pressure these options are revisited?</p> <p><b>8. Water Potable and Foul.</b> Bucklebury currently struggles with water pressure. This has been a constant problem for years and every time the water pressure is increased to maintain the service, we have numerous bursts. Perhaps Thames water can provide a work sheet of the necessary repairs that they have provided in the past year. Every time we have a burst the damage to pavement and road surface is extensive and is only temporarily repaired. Without the necessary improvement within the existing infrastructure this is going to be an ever-increasing problem.</p> <p>Water treatment will also need to be a major consideration, just to build on the slope will require considerable engineering to maintain the 1:50 fall to</p>	<p>that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>

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	<p>prevent separation of solids. These plans need careful consideration and engineering and will be basically neglected due to commercial demand. Is the proposal to link this additional foul water to the existing treatment plant down Lower Way? This is already a persistent problem with odour and more input will undoubtable cause more concern to local residents and sensitive receptors.</p> <p><b>9. Traffic</b> The modelling shown on the flowchart is, quite frankly naïve and ill conceived. Currently (pre- COVID-19) the amount of traffic on the A4 traveling East is very high with pinch points at Pipers Lane roundabout especially during school term time. The traffic blocked by the railway crossing is an economic and environmental disaster. The queue extending south from the crossing up towards Greenham is extremely dangerous and it is only a matter of time before we see a huge accident as a result of queuing around blind bends.</p> <p>Although modern cars have reduced emissions more than 50% will have engines running and any background environment study would reveal the danger this poses to both pedestrians and residents. Any more traffic will backup Pipers Lane causing more congestion in this sensitive area. Section 2.72 does not even mention this point in the report!</p> <p>If we work on the figures as stated in item 6.3.1. the very conservative figure of 12% of the volume would go through Upper Bucklebury. Simple maths makes this this in excess of 900 vehicle movements per day. It is obvious that with congestion on the A4, drivers will be forced into finding alternative route and will naturally use Bucklebury as a rat-run to travel East. Cold Ash will have a similar problem with traffic heading North. This is just not acceptable and the development should be restricted by this factor alone.</p> <p>There is mention in the report that COVID-19 will change the way we live in the future. This is just conjecture. As soon as “normal” social activities can</p>	<p>Response to traffic matters have been set out above.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities</p>

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	<p>be resumed the volumes will soon creep up to the existing level but maybe not quite as high as Pre March 2020.</p> <p><b>10. Waste Collection</b> The Padworth Facility has already reached maximum capacity. There is no redundancy in the system for organic waste streams and tax payers have already had a levee imposed to try and reduce the amount of kerbside collected green waste. There is currently a danger of fire with organic waste streams with high calorific values and no spare capacity to comply with current working practises. The average UK household generates over a tonne of waste per annum (DEFRA March 2020), in simple terms 2,500 tonnes but have Veolia even been consulted on this serious matter? Have they got the resources to collect and handle this expected volume increase?</p> <p><b>11. Impact on Bucklebury</b> The Common is under increasing pressure and volunteer groups are already fully employed in rubbish collection and maintenance. What measures are to be implemented to protect this valuable enclave and what modelling has been provided to protect these areas? Currently as residents we are subject to illegal 4x4 traffic and motor bikes over which there is little or no control or enforcement. Fly tipping is a regular occurrence and will only increase.</p> <p>The increase in footfall which we have seen recently has had a devastating impact on footpaths only to be compounded by the wet weather. Additional residents will naturally want to use this attractive resource and will cause more attrition and generate more refuse.</p> <p>The traffic situation mentioned above would change the nature of the village entirely. The route up Harts Hill, through Upper Bucklebury would filter additional traffic along the common (The Camp Road) through Chapel Row, down through Southend Bradfield. This will lead to increased speeding as cars regularly fail to comply with the 30 mph speed limit as they approach/leave Chapel Row and this will be repeated at Bradfield and the subsequent return trip. There will also a bottleneck at Theale with the</p>	<p>and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The consultation was run in accordance with the council's Statement of Community Involvement (SCI). A public consultation such as this would usually last 6 weeks but because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

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	<p>junction of the Pangbourne Road. This is already causing a problem and an increase in the traffic volume will result in severe delays.</p> <p>The buffer strip as drawn on the planning documentation is just a token “stroke of the pen” to make the site look green. There has been insufficient time to carry out any biodiversification study. If the development is to proceed the parishioners and parish council of Bucklebury need to be involved to plan and secure this amenity. There are obvious concerns that these areas are just token screens and will be trashed through heavy footfall. A full planting schedule needs to be implemented at an early stage to establish this area and the intention and allow the trees to grow and safeguard the runoff (Mature oaks, Beech and other hardwoods are classed in planning rules/building regulations as “Class A” with an uptake of up to 80 gallons per day).</p> <p>Floral Way has always been seen as the natural boundary to North Thatcham, allowing a clear distinction between this at the surrounding villages such as Bucklebury. Its crossing marks a dangerous precedent for the removal of the rural character of West Berkshire which has prevailed in this region for centuries.</p> <p><b>12. Timeframe</b> The BBC did not announce that the site at Grazeley had been rejected for planning until the 15th December 2020. I think this was the first that many of us were aware of the problem with the extension of the AWE Burghfield safe Zone, the DEPZ. The decision to develop North Thatcham housing development and all that it entails does seem to have been sprung on us just before Christmas, leaving the resident’s little time to adjust and comprehend the full extent of the proposal report. We are indebted to Bucklebury Parish Council for airing the proposal and making a number of webinar meetings. As this was announced on the 21st December with the instruction that all comments have to be submitted by the 5th February, it is therefore understandable that there appears to be a lack of confidence in West Berkshire Council and huge mistrust and given rise to thoughts of many that this is a fait accompli. Even this morning there are residents in the Dunstan Park who were totally unaware of any new planning</p>	

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	<p>proposal and this is seen to have been carried out stealthy. This resentment is understandable as there has been inadequate time for proper and considered consultation.</p> <p>These arguments make it clear that the proposal should be rejected on an environmental level alone. The area does not have the infrastructure to support such a large development and it is a further erosion of rural South England. The current proposal is too large and will lead to multiple environmental issues and no further expansion of Thatcham should be permitted until a bridging system at the railway crossing has been designed, engineered and implemented.</p>	
John de Lara (lpr1250)	<p><b>Response – STRONGLY OPPOSE</b></p> <p>I would like to register my personal objection to the WBC Local Development Plan particularly the massive over development of NE Thatcham</p> <p>1) Consultation Process is seriously flawed and not fit for the size and scale of a development of this size.</p> <p>The information available on the website – <a href="http://consult.westberks.gov.uk/kse/event/35924">http://consult.westberks.gov.uk/kse/event/35924</a> is indeed very comprehensive and shows a great deal of work conducted by WBC. However, I do question the consultation process that is being followed. This development is not insignificant, in fact it is proposing the creation of a NEW TOWN the size of Hungerford in an area a third the size.</p> <p>My objection to the consultation process is that the plans were released during a pandemic, while the UK is under lockdown and only a very short period for responses given. In a more normal situation, there would be an extended period of public consultation, with meetings and presentations by WBC enabling the executive to understand the view of the public. In this instance there has been no public presentation by WBC.</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that "We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Consequently, I believe this development plan is being rushed through for political reasons.</p> <p>2) Impact on ANOB.</p> <p>To the North of this new town is the boundary of the ANOB and I believe that developing up to the boundary will have a negative impact on the ANOB with increased light pollution, increased noise, increased traffic through the ANOB and reduced bio diversity within the ANOB and surrounding area.</p> <p>The proposed “Country Park” may look like a good idea on paper, but having such an area of managed green space will reduce bio diversity due to the mono culture nature of managed green spaces.</p> <p>When Thatcham was developed in the late 1990’s Floral way was built as a boundary to ensure that there was a suitable wild space between Thatcham and the ANOB. This has been upheld by the Secretary of State, most notably in the rejection of the development at Siege Cross (15/00296/OUTMAJ)</p> <p>3) Impact on local area</p> <p>I refer to the Siege Cross ruling where the Secretary of State called out the loss of agricultural land as a reason to reject development, yet in this development even more agricultural land would be lost. How can WBC justify a high reduction in productive land, when this has already been established as a reason not to develop on land.</p> <p>In 2007 there was a massive flooding event and subsequently WBC were sent a report from environmental experts stating “it would be utter madness to build on the slope “. In fact recent rainfall has already shown that the slope will hold a lot of water and protect Thatcham. I don’t believe that WBC are taking the flooding risk seriously enough.</p>	<p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>



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	<p>As part of the modelling for this new town, there have been traffic estimates created. These have been created during a national lockdown and hence I question the validity of this data. Also from the documents provided the traffic impact on the surrounding villages has not been considered or mitigated.</p> <p>The crematorium was sited at the far eastern end of Thatcham away from population centres to provide a peaceful space for people to say goodbye to relatives and to mitigate the possible environmental impact of the emissions. This has been successful and now WBC want to develop the land right up to the crematorium- what has changed?</p> <p>4) West Berkshire declared a climate emergency on 2 July 2019.</p> <p><a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=63714184440230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=63714184440230000</a> WBC - Environment Strategy - with declaration of climate emergency.</p> <p>WBC need to consider this development against this background of their own stated intentions. This development will result in increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and so on. Paving over countryside can only be detrimental to the environment and result in a loss of our nature and biodiversity. I am sure many of the objections WBC receive will relate this and I know for sure that all local environmental organisations such as BBOWT, CPRE and WBGE are all violently against this development going ahead.</p> <p>It is a fact that domestic heating is the single largest CO2 producing task, and by creating this new town there would be a significant increase in CO2. What are the plans to make this development carbon neutral?</p>	<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all</p>

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	<p>5) Precedent: Siege Cross Development - Declined</p> <p>In 2017 the Secretary of State rejected a proposal for 495 homes at Siege Cross (15/00296/OUTMAJ), this is now included as 30% of this new town.</p> <p>Why are WBC now so supportive of the 4 proposed developers, and why, having already been rejected once, WBC are not questioning why they are wasting more money trying again?</p> <p>6) Do we need this New Town?</p> <p>I seriously question the need for this new town to be created at a time when WBC have substantial land earmarked for development suitable for the next 10 years or so. Whilst I appreciate they need to plan ahead they have used a very broad brush approach, looking on a map and putting a plan together.</p> <p>WBC have not indicated if they have considered brown field development as this would be on sites with infrastructure already in place.</p> <p>I also question the basis for the population forecasts as they were all completed pre Brexit and pre Pandemic.</p> <p>7) New Town</p> <p>This development needs to be considered a new town and, in my opinion, represents a massive over development of the site.</p> <p>Also, as a new town no provision has been made for employment or services. All that has been included is 3 schools. This means that WBC consider this to be dormitory town with everyone travelling to work. Hence, I do question all the impact assessments WBC have used as they seem to be seriously flawed at best.</p>	<p>development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>A response to the Siege Cross development has been provided above.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing</p>

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	<p>In conclusion this is a New Town development, that will have a seriously detrimental impact on the local environment and economy, that is being rushed through.</p>	<p>planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of</p>

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		<p>climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The proposed allocation of sites takes account of the evidence from the HELAA and Sustainability Appraisal (SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy. Thatcham lies in the top tier of the settlement hierarchy (it is an Urban Area). Urban Areas will be the prime focus for housing and economic development.</p> <p>The proposed strategic allocation of North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p>
Catherine De Lara (lpr1255)	<p><b>Response – STRONGLY OPPOSE</b></p> <p>I would like to register my personal objection to the WBC Local Development Plan particularly the massive over development of NE Thatcham</p> <p>1) Consultation Process:</p> <p>The information available on the website – <a href="http://consult.westberks.gov.uk/kse/event/35924">http://consult.westberks.gov.uk/kse/event/35924</a> is indeed very comprehensive and shows a great deal of work conducted by WBC.</p>	<p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that “We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government’s aspirations to have plans in place across the country by 2023.”</p>

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	<p>However, I do question the consultation process that is being followed. This development is not insignificant, in fact it is proposing the creation of a NEW TOWN the size of Hungerford in an area a third of the size.</p> <p>My objection to the consultation process is that the plans were released during a pandemic, while the UK is under lockdown and over the Christmas period, only a very short period for responses given. In a more normal situation, there would be an extended period of public consultation, with meetings and presentations by WBC enabling the executive to understand the view of the public. In this instance there has been no public presentation by WBC.</p> <p>Consequently, I believe this development plan is being rushed through for political reasons.</p> <p>2) Impact on ANOB.</p> <p>To the North of this new town is the boundary of the ANOB and I believe that developing up to the boundary will have a negative impact on the ANOB with increased light pollution, increased noise, increased traffic through the ANOB and reduced bio diversity within the ANOB and surrounding area. The AONB represents the closest area of wild green space to the development, this will see a large increase in walkers, cyclists 4X4 drivers and other users of the area. This will lead to even more damage to the footpaths and by-ways, more litter and increased fly-tipping which will further erode the value of the ANOB.</p> <p>The proposed “Country Park” may look like a good idea on paper, but having such an area of managed green space will reduce bio diversity due to the mono culture nature of managed green spaces.</p> <p>When Thatcham was developed in the late 1990’s Floral way was built as a boundary to ensure that there was a suitable wild space between Thatcham and the ANOB. This has been up held by the Secretary of State, most</p>	<p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>The consultation was run in accordance with the council’s Statement of Community Involvement (SCI). A public consultation such as this is would usually last 6 weeks but because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed</p>

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	<p>notably in the rejection of the development at Siege Cross (15/00296/OUTMAJ)</p> <p>3) Impact on local area</p> <p>I refer to the Siege Cross ruling where the Secretary of State called out the loss of agricultural land as a reason to reject development, yet in this development even more agricultural land would be lost. How can WBC justify a high reduction in productive land, when this has already been established as a reason not to develop on land.</p> <p>In 2007 there was a massive flooding event and subsequently WBC were sent a report from environmental experts stating “it would be utter madness to build on the slope “. In fact recent rainfall has already shown that the slope will hold a lot of water and protect Thatcham. I don't believe that WBC are taking the flooding risk seriously enough.</p> <p>As part of the modelling for this new town, there have been traffic estimates created. These have been created during a national lockdown and hence I question the validity of this data. Also from the documents provided, the traffic impact on the surrounding villages has not been considered or mitigated. Many of the surrounding villages do not have pavements and already suffer from problems with speeding, an increase in traffic flow could only increase the danger to the inhabitants of those villages.</p> <p>The crematorium was sited at the far eastern end of Thatcham away from population centres to provide a peaceful space for people to say goodbye to relatives and to mitigate the possible environmental impact of the emissions. This has been successful and now WBC want to develop the land right up to the crematorium- what has changed?</p> <p>4) West Berkshire declared a climate emergency on 2 July 2019.</p>	<p>development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other</p>

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	<p><a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000</a> WBC - Environment Strategy - with declaration of climate emergency.</p> <p>WBC need to consider this development against this background of their own stated intentions. This development will result in increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion of an extra ~5000 vehicles on the road. Paving over countryside can only be detrimental to the environment (Once the land is lost it will never be recovered) and result in a loss of our nature and biodiversity. I am sure many of the objections WBC receive will relate this and I know for sure that all local environmental organisations such as BBOWT, CPRE and WBGE are all against this development going ahead.</p> <p>It is a fact that domestic heating is the single largest CO2 producing task, and by creating this new town there would be a significant increase in CO2. What are the plans to make this development carbon neutral? Building solar farms on yet more green space is not a viable solution as yet more farmland will be lost.</p> <p>There are already issues in the summer months with water supplies leading to hosepipe bans, where are the additional 875,000 litres of water per day going to come from? (350l/day/household, quoted by the energy saving trust) This figure also does not include all the water locked up in appliances such as toilets.</p> <p>Waste management is also an issue with long queues to access the municipal tip, where is all the additional waste from this development going to go?</p>	<p>changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West</li> </ul>

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	<p>5) Precedent: Siege Cross Development - Declined</p> <p>In 2017 the Secretary of State rejected a proposal for 495 homes at Siege Cross (15/00296/OUTMAJ), this is now included as 30% of this new town.</p> <p>Why are WBC now so supportive of the 4 proposed developers, and why, having already been rejected once, WBC are not questioning why they are wasting more money trying again?</p> <p>6) Do we need this New Town?</p> <p>I seriously question the need for this new town to be created at a time when WBC have substantial land earmarked for development suitable for the next 10 years or so. Whilst I appreciate they need to plan ahead they have used a very broad brush approach, looking on a map and putting a plan together.</p> <p>WBC have not indicated if they have considered brown field development as this would be on sites with infrastructure already in place.</p> <p>I also question the basis for the population forecasts as they were all completed pre Brexit and pre Pandemic.</p> <p>7) New Town</p> <p>This development needs to be considered a new town and, in my opinion, represents a massive over development of the site.</p> <p>Also, as a new town no provision has been made for employment or services. All that has been included is 3 schools. Getting an appointment to see a local GP can be incredibly difficult, this development is only going to make this situation worse, even if a new practice was to be built it would not</p>	<p>Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</p> <ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>A response to the Siege Cross development has been provided above.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review</p>



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	<p>happen until there were enough residents to make it viable, in the meantime provision of medical services will suffer, the same is true for dentists.</p> <p>This indicates that WBC consider this to be dormitory town with everyone travelling to work, most of whom will not be using public transport as there will not be enough local jobs to support such a large increase in population.</p> <p>Hence, I do question all the impact assessments WBC have used as they seem to be seriously flawed at best.</p> <p>In conclusion this is a New Town development, that will have a seriously detrimental impact on the local environment and economy, that is being rushed through without due and proper consultation processes being followed.</p>	<p>will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The proposed allocation of sites takes account of the evidence from the HELAA and Sustainability Appraisal</p>

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		<p>(SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy. Thatcham lies in the top tier of the settlement hierarchy (it is an Urban Area). Urban Areas will be the prime focus for housing and economic development.</p> <p>The proposed strategic allocation of North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p>
Theo Powell (lpr1254)	<p>I am writing to object to the plans to build 2500 houses in the greenspace between my village Upper Bucklebury and Thatcham. It is very clear there are multiple reasons which show that what these plans are proposing will be extremely damaging to both the environment and the general quality of living in both Upper Bucklebury and Thatcham.</p> <p>To start with I would like to bring up the fact that building 2500 houses, a development the size of Hungerford, would essentially connect Upper Bucklebury to Thatcham resulting in Upper Bucklebury losing its rural aspect and completely changing the character of our village. On top of this, there is the so called “country park” which has been proposed as a border to Upper Bucklebury. From what we can see this “country park” will be a few hundred metres worth at most of what is already there, seeing as there seem to be no apparent plans or budget to maintain or develop this “country park” any further. There is also no guarantee that this “country park” won’t be used in the future for further building and development.</p> <p>Another point is the traffic. In Bucklebury Parish Council’s presentation to the community, it was said that there would be a projected 12% increase in traffic coming up Harts Hill and through Upper Bucklebury. I think it is clear that this 12% is completely inaccurate and that adding another 2500 cars minimum will cause a huge congestion problem both in Thatcham and in Upper Bucklebury. This in itself brings up plenty of problems and dangers to pedestrians (especially children) and to wildlife in and around our village and</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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	<p>once again, completely disrupts and ruins the tranquillity of living in the village.</p> <p>To add to that, these plans bring many environmental problems, the biggest being the obvious increase in pollution which comes with increasing the size of a town by 25%. This will involve pollution from traffic congestion as well as light pollution that will detract from the clear night skies we currently enjoy and appreciate in Upper Bucklebury.</p> <p>Flooding is also a consideration, if the proposed site is concreted over, all the excess water that currently drains into the surrounding fields will flow down into Thatcham causing worse flooding than has already been experienced. I don't believe the current flood alleviation schemes will be sufficient to prevent this.</p> <p>As a young 18 year old who has grown up playing in the woods and the surrounding fields of this area, I feel this development is taking away that option for young people and future generations.</p> <p>I would therefore like to strongly object to this proposal in order to protect and preserve the identity of our village and its surroundings.</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p>
Grainne McQuaid (lpr1256)	<p>I would like to strongly register my objection to the proposed 2500 houses development in Thatcham:</p> <p><b>Communication:</b> I only became aware of this proposed development about 3 weeks ago. It has not been widely publicised by WBC. A proposal of this size should, surely, warrant direct written communication from WBC to all affected residents/parishioners so that ample time is given to review and consider the proposal in depth.</p> <p><b>Greenbelt:</b> WBC previously approved a Bucklebury Plan that agreed to maintain a strong greenbelt between Thatcham and Upper Bucklebury. The development goes against this and would effectively merge Upper Bucklebury with Thatcham.</p> <p><b>AONB and the destruction of wildlife:</b> This would be a massive over-development of the countryside and would destroy the beauty of the area. There would be an increase in dog-walkers, quadbike/scrambler riders, dog</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and</p>

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	<p>fouling and litter. The increase in cars driving and parking on the Common for people to go walking etc. would have a huge detrimental effect on the area...not to mention the destruction of the wildlife.</p> <p><b>Traffic Increase:</b> This will have a significant impact on traffic in the area, especially on the routes in and around Thatcham and Newbury and over the level crossing. This will increase the traffic through all of the surrounding villages of Upper Bucklebury, Cold Ash, Chapel Row, Bradfield Southend etc... Speeding through Upper Bucklebury, both along Broad Lane and on Burdens Heath, is already a major problem and the increase in traffic would only add to this.</p> <p><b>Medical Practices:</b> This will put huge pressure on Chapel Row Surgery and Burdwood Surgery. Already, it can take a couple of weeks to get an appointment at Chapel Row. The extra demand that the new development would generate will negatively impact Bucklebury residents.</p> <p><b>Flooding:</b> A hill-side development of this size will cause huge flooding difficulties for the people of Thatcham.</p> <p><b>Businesses benefit:</b> I fail to see how the proposed development will benefit businesses in Upper Bucklebury – predominantly the Pub and the Shop. Pub usage is already in decline, and there is already a Pub at the bottom of Harts Hill. Our local shop is not likely to benefit either as the proposals indicate that shops will be included in the development.</p> <p><b>Pollution:</b> It will significantly increase the air, noise and light pollution to Bucklebury residents.</p> <p><b>Schooling:</b> this will obviously have an impact on local schools. The proposal is for 3 new schools. If these are built before the houses are complete, it will poach children from local schools, such as Upper Bucklebury which will</p>	<p>the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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	<p>make that unsustainable. If they are built after, then local schools will be overwhelmed beforehand.</p> <p>A development of this scale, one that is close in size to Hungerford, will impact Thatcham and all the surrounding villages in so many detrimental ways.</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

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		In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.
Julian Dobbins (lpr1257)	<p><b>[Comments on housing need also added to SP12]</b></p> <p>I am writing to voice my <b>objections</b> to the proposed NE Thatcham development (Policy SP17). I am a resident of Upper Bucklebury, and have lived in the village with my family for 15 years.</p> <p>My objections are based on review of the consultation document plus supporting material, including:</p> <ul style="list-style-type: none"> <li>• Thatcham Strategic Growth Study 2019 (David Lock Associates)</li> <li>• West Berkshire Land Character Assessment 2019 (LUC)</li> <li>• Flooding in Thatcham 2008 (Sue Everett)</li> <li>• West Berkshire Environment Strategy 2020-2030</li> <li>• West Berkshire Local Plan Review to 2036 Sustainability Appraisal / Strategic Environmental Assessment 2019</li> <li>• Kennet Catchment Management Plan 2018</li> </ul> <p>In addition, I have spoken with environmental consultant Sue Everett, former local resident, advisor to Thatcham Town Council and noted expert on development in relation to flooding, ecology, and overall environmental impact.</p> <p>As a result, I wish to <b>object</b> on the grounds of:</p> <p><b>Breaching of the Floral Way settlement boundary</b></p> <p>Extending Thatcham to the north-east will continue to destroy the rural areas so highly prized by West Berkshire in all its planning material. In the LCA,</p>	<p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p>



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	<p>the following detractors' (to the distinctly rural environment of the area) are described - each one of these will be made worse by this development:</p> <p><b>Decreasing separation/coalescence between settlements</b></p> <p>The expansion of Thatcham and Newbury since the mid-20th century, and also of villages within the character area, has reduced the physical and perceptual separation between settlements. This is particularly evident at the western end of the character area, where there is near coalescence along the main connecting roads between Newbury and Thatcham, Cold Ash, Ashmore Green, Curridge and Hermitage.</p> <p><b>Increased suburbanisation</b></p> <p>Modern housing along main routes and on adjacent cul-de-sacs, together with street lighting and pavements, has introduced suburban characteristics to some places, particularly where there is less tree cover to mask changes e.g. the southern end of Cold Ash and linear development along the B4009 Long Lane just north of Shaw. Incremental development of the countryside settlements is also an issue, including the enlargement of curtilages, security lighting, entry gates etc.</p> <p><b>Loss of gradation between settlement and countryside</b></p> <p>Farm buildings and small pasture fields adjacent to settlements have proved vulnerable to development (typically of small residential clusters), due in the former case to presence of existing structures and in the latter to the screening/containment provided by boundary features. However, farm buildings, even when development has left them adjacent to settlement edges, contribute to rural character when they retain a relationship with farmland; and small enclosures, even when used as paddocks, form a transition between settlement and countryside that can contribute positively</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>to landscape character, particularly when they retain a relationship with a historic settlement core.</p> <p><b>Increased traffic on the rural lane network the following detractors are already happen and will only get worse:</b></p> <p>The Siege Cross planning rejection from 2015 references so many reasons for it being declined (beyond just not being part of a development plan). All of those reasons in point 3 (Landscape and Visual Character) still apply with the current proposal, and more so; the fact that the proposal has been included in the development plan does not suddenly mean those previous reasons for objection have been remedied. The rejection of that section follows the individual points of rejection by stating:</p> <p>For the above reasons the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in terms of its location over the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development also fails to conserve the historic landscape setting and rural context of Siege Cross Farm.</p> <p>The settlement boundary is there for a reason, and West Berkshire highlighted many of those reasons very eloquently in rejection of the proposal.</p> <p><b>Increased risk of flooding and urban run-off</b></p> <p>As stated in the LPR, appendix 4b:</p> <p><i>There is a risk of surface water flooding with the site along the natural drainage routes based on EA modelling. The site is crossed by a number of ephemeral watercourses and these corridors would need to form part of a wider SuDs strategy to help manage the run-off from any new development.</i></p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p>

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	<p>All WBC supporting material speaks of mitigation measures, and yet the flooding in 2007 (regarded as a 1-in-200 year event, despite the EA assessment of it being a 1-in-169 years) seems to fall outside the planning horizon for risk planning; what hope can we have that these measures will be effective, especially given that <i>'the risk of flooding continues to escalate; making the events that shattered so many communities [in 2007] an ever increasing threat.'</i> (Pitt Review (2008))</p> <p>As the Flooding in Thatcham (2008) report states, 'the principal source of floodwater [in the 2007 floods] was run-off from farmland to the north of Thatcham.' In my recent conversation, with Sue Everett, author of the report, she remarked that it would be "utter madness to build on that slope" (referencing the designated area to the NE of Thatcham).</p> <p>Regarding the further effects of run-off, Sue Everett spoke of the dangerously high levels of phosphates and nitrates already impacting the Kennet Valley, and that development in NE Thatcham would add considerable urban run-off as the LPR states:</p> <p><b><i>The Kennet and Avon Canal, south of the railway line, is a Site of Special Scientific Interest and development to the north would have to consider the water quality of any surface water discharged to the south.</i></b></p> <ol style="list-style-type: none"> <li>1. Impact on AONB through loss of separation from urban settlements and increase in traffic (pedestrian / cycle / automotive)</li> </ol> <p>As mentioned in (a), above, breaching the settlement boundary will have huge impacts on the AONB, both in terms of the rural character, and materially on the quality of life in those settlements adjoining THA20. Aside from the 'loss of greenfield land' (mentioned in the LPR, appendix 4), the LPR also states the 'site is of such a scale that it would provide new services and facilities that would be available to surrounding settlements like Cold Ash and Bucklebury', which clearly indicates the impact it will have, just from</p>	<p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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	<p>the point of view of facilities, potentially threatening the local shop, the local school etc., but also in terms of bringing Thatcham closer, adding traffic to local lanes (which have no pavements), and eroding still further the fragile commercial, cultural and environmental nature of the settlements within the AONB.</p> <p>As stated in DC1:</p> <p><i>Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.</i></p> <ol style="list-style-type: none"> <li>1. Destruction of ancient forest land, fragile ecosystems (including AONB and SSSI, and land supporting protected species under European law), both through direct and adjacent loss of habitat, threatening biodiversity and general ecological well-being</li> </ol> <p>As the LPR states, the development site contains ancient woodland. According to the Government website:</p> <p><i>Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It's important for its:</i></p> <ul style="list-style-type: none"> <li>• <i>wildlife (which include rare and threatened species)</i></li> <li>• <i>soils</i></li> <li>• <i>recreational value</i></li> <li>• <i>cultural, historical and landscape value</i></li> </ul>	<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a</p>

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	<p>The LPR also states that the most recent TVERC study revealed there to be protected and priority species within the development area.</p> <p>If both of these factors aren't enough, the loss of greenfield habitat will drive species into adjacent (largely wooded and heathland) habitats, resulting in fragile ecosystems coming under further pressure (reduced space, resources etc.), upsetting the delicate balance of these ecosystems. This <u>will</u> result in a loss of biodiversity. Extend that still further to Bucklebury Common and its adjoining woodlands, a profoundly fragile environment already under pressure from illegal motor vehicle use, for example, and WBC / Developer assurances of a net gain in biodiversity do not have any credibility whatsoever. Proposals speak of much of the area being a designated '<i>Biodiversity Opportunity Area, part of the Bucklebury Plateau BOA, and the site is within a local habitat network.</i>' It goes on to state that this '<i>indicates that a net gain in biodiversity should be delivered through development.</i>' Improving biodiversity in the upper slopes of THA20 is not going to make up for the loss of habitat that construction of 2500 homes and its supporting infrastructure have on the rest of the proposed development area.</p> <p>By way of additional context, the country's habitat is under extreme pressure, and focusing on biodiversity without paying attention to abundance is neglectful:</p> <p>A 2019 New Scientist article (<a href="#"><u>Thousands of UK wildlife and plant species are in decline</u></a>) includes the following:</p> <ul style="list-style-type: none"> <li>• <i>Of the species that we have more detailed data on, nearly 700 saw their numbers fall [since the 1970s] by 13 per cent. The declines have left 15 per cent of species facing extinction, including the turtle dove, numbers of which are down 98 per cent in half a century.</i></li> <li>• <i>"We have this pattern of ongoing loss, which is showing no slowing in the rate of decline. Overall, we are losing more species than we</i></li> </ul>	<p>landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to impact on water quality and environmental designations the policy for these matters are contained within DM5 Water Quality, DM6 Water Resources and Waste Water and SP11 Biodiversity and geodiversity. The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p><i>are gaining,” says Daniel Hayhow of the Royal Society for the Protection of Birds.</i></p> <ul style="list-style-type: none"> <li>• <i>Hayhow calls [the decline in species numbers] a “canary in the coal mine signal” because changes in distribution usually happen much more slowly than changes in abundance.</i></li> </ul> <p>In a Dec 2019 paper, '<u>Ongoing, but slowing, habitat loss in a rural landscape over 85 years</u>,' Ridding at al. make the following relevant observations, including the point that government performance on environmental management not only has a poor record, but is also guided by insufficient data:</p> <ul style="list-style-type: none"> <li>• <i>The National Planning Policy Framework sets out government’s planning policies for England which requires that local authorities must ensure that any developments have minimal impact on biodiversity. Although the importance of protected areas for biological conservation is acknowledged, there is little empirical evidence of their effectiveness (Gaston et al. 2008; Greve et al. 2011).</i></li> <li>• <i>The findings [in this paper] illustrate a long history of habitat loss in the UK, and are important for planning landscape management and ameliorative actions, such as restoration. Our analysis also highlights the role of statutory protection in retaining semi-natural habitats, suggesting the need for continued protection of important habitats.</i></li> <li>• <i>many long-term [biodiversity] studies often focus on the last forty years at best.</i></li> </ul> <p>In other words, government and developer tendency to use biodiversity data from recent years masks the losses which have already occurred and gives us what can be referred to as "shifting baseline syndrome", through which there is an '<i>acceptance of the current low biodiversity state as being normal (Soga and Gaston 2018).</i>'</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to concerns regarding other types of pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p>

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	<p>On one recent walk along Cox's Lane, on the eastern edge of the proposed development area, numerous badger setts were noted, with entrances exposed to the lane itself. Aside from any lasting impact to such habitats once any residential or commercial development is established, the development work itself will dramatically alter the environment within which these animals, and their entire ecosystem, are living.</p> <p>The proposal's comment that '<i>Up to date ecological surveys will be required to determine detailed mitigation measures</i>' needs much more detail before it can be considered as having any merit.</p> <p>It is difficult for us to take WBC assurances of biodiversity seriously; there is so much documentation supporting these proposals and yet a recent TVERC analysis hasn't even been carried out, despite previous references to protected species. This does not inspire confidence in the priority of environmental protection, nor preservation of the overall rural context in which these species live.</p> <p>In addition to the points already made, the question of pollution (light, air, noise, water) needs to be addressed and barely seems to offer any acceptable outcomes - dark skies, a quiet environment (embodied by the network of quiet lanes in the Bucklebury parish), clean air (critical for our lichens and mosses, an important base layer in the ecosystem) and clean water are all impacted and will damage the AONB irreparably.</p> <p><b>1. Traffic congestion around NE Thatcham</b></p> <p>Thatcham's traffic issues are well-understood by any local resident, often leaving cars sitting in traffic queues along the A4 or at the level crossing for considerable lengths of time, hardly helping the council's carbon net-zero and healthy air ambitions. As the LPR states:</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p>

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	<p><i>'Development would have a very significant impact on the local highway network.'</i></p> <p>The document then adds:</p> <p><i>'Opportunities for modal shift should be maximised. A transport assessment would also be required.'</i></p> <p>Once again, we find the need for further analysis before this proposal can be considered as credible; it is hard to find any piece of data capable of assuring anyone in the local community that adding 2500 homes into this area will do anything but cause huge disruption.</p> <p><b>Impact on an already-struggling local water supply</b></p> <p>Water availability in the region is an issue, as the Kennet Management Plan (and my conversation with Sue Everett) makes clear. Additional development of this scale will only add to the depletion of resources.</p> <p><b>Failure to acknowledge housing needs based on household type, nor recognise the opportunities for commercial property re-use and town centre regeneration</b></p> <p>SP12 (Approach to Housing Delivery) states:</p> <p><i>Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.</i></p>	<p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>



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	<p>In the most recent ONS household forecast data, which covers the period 2018 - 2028, the entirety of West Berkshire's housing growth is described as 2482, suggesting a 'necessary' annual figure (at least for the period covered) much lower than put forward in this proposal.</p> <p>Furthermore, regarding housing mix, the proposal (table 3 in SP12) shows that 60% - 70% of Market housing and 35% - 45% of Affordable housing will be 3 or 4 bedroom houses. ONS data shows that by far the highest growth in housing demand for West Berkshire will come from one-person households (10.7%, versus growth rates of -6%, -8.9% and -11.2% for families with 1, 2 or 3+ dependent children respectively).</p> <p>Given the housing mix suggested by the ONS forecast data, the proposal seems completely out of touch with the reality of local needs. In light of the changing nature of town centres, as retail moves on online, and an ageing population needing access to public transport, does it not make much more sense to repurpose unused commercial property for residential use, and in doing so change the declining nature of the high street, provide easier access to local facilities (especially for the ageing population) and reduce dependency on short car journeys clogging our streets and adding to the community's carbon footprint?</p> <p><b>Lack of meaningful and timely democratic engagement in the review process, and lack of thorough analysis of key elements of the proposal</b></p> <p>On my final point, I would say, very strongly, that there has been a significant lack of community engagement to date in the review process. Regardless of any efforts made by West Berkshire to make development proposals visible, they have been insufficient, particularly given the challenging macro-context in which we are all currently living. As a result, awareness is poor, general understanding of detail is worse and timescales have become unreasonably tight to make sense of all relevant material. If West Berkshire Council truly believes that <i>'everyone in West Berkshire has a role to play'</i> (Environment Strategy 2020-30) in helping West Berkshire</p>	<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>Policy SP18 Housing Type and Mix is the policy which sets out that there is a wide choice and mix of housing to meet existing and future local needs, and to help secure mixed and balanced communities. Please see comment above in relation to how the LPR policies will be used.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The Council maintains an evidence base which informs the LPR to ensure the policies contained within the planned are justified.</p>

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	<p>become the model for a better, more environmentally-aware and sustainable community, surely this begins by ensuring broad levels of engagement from the whole community. Many people we have spoken with on this topic were unaware of it until very recently. Even the LPR (appendix 4) notes that there have been no comments from Midgham PC, despite their parish being directly impacted by the proposal. Add to this a lack of completed analyses throughout, on key matters such as flood prevention, water availability, environmental impact and traffic, and it is clear, despite all the assurances made by WBC and its consultants, that there is much that is very wrong with this proposal.</p> <p>I look forward to discussing this matter more fully at the earliest opportunity once West Berkshire Council has considered all input and is ready to re-engage with the community it serves.</p>	
Holly Ellis (lpr1259)	<p>I object to 2500 houses being built on this farmland, due to:</p> <ul style="list-style-type: none"> <li>• Loss of green area</li> <li>• Over development of Thatcham</li> <li>• More pollution</li> <li>• More traffic</li> <li>• Kennet school already full capacity and over stretched</li> <li>• Overcrowding in all public areas and buildings</li> <li>• Overstretched/ over populated GP surgeries already</li> </ul> <p>Please take into consideration the views of all people living in Thatcham and Upper Bucklebury and surrounding areas.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure</p>

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		<p>which will include a new community park linking Thatcham to the AONB.'</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

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		<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Name supplied (lpr1267)	<p>Having been a fortunate resident 40+ years, the volume of houses being built in recent years, e.g. Kennet Heath 900 homes, has not been sustainable. The infrastructure in local schools, healthcare and facilities has not kept up with demand, as detailed in the plan at 6.36 'However, in recent decades, the provision of social infrastructure has not kept pace with housing growth.'</p> <p>Whilst I fully acknowledge the requirement for additional homes in West Berkshire, (especially affordable) Thatcham is, as detailed in the plan, viewed as a large village and <b>does not have the infrastructure</b> in place for even the current population, far from it! Indeed, the plan details at 6.19' The TSGS (Thatcham Strategic Growth) shows that <b>Thatcham compares poorly to other similar centres</b> in terms of overall service provision, including public services and commercial services. The town's self-image is of a large village, rather than as a thriving market town.'</p> <p>Developments, including this one, promise of new additional schools never come to fruition – Dunstan Park as well as on Kennet Heath to name examples. The plan details proposal for an additional secondary school, with Kennet School already in the East of Thatcham that is not where the School will be needed as far too close proximity. Land near the Hospital, by the Garden Centre roundabout, would be more central to the need allowing</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p>

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	<p>students to the West of Thatcham able to walk/cycle to school rather than travel by vehicle to secondary schools in Newbury.</p> <p>The plan details two primary schools, could this be clarified if this is one infant and one junior school? Existing primary schools in Thatcham are severely underfunded and understand that the intake for September 2021 means that all will have spaces – resulting in again being underfunded. How does the council take into consideration declining birth rate in the community? And therefore, potential, subsequent requirement for vast amount of homes?</p> <p>There is no mention of pre-school facilities in the plan?</p> <p>Further objections:</p> <p>Sewage/Water</p> <p>Thames Water are already struggling to cope with the current population in Thatcham and have been served notice to clean up their act.</p> <p>Despite the recent flood alleviation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The new houses currently being built in Woolhampton are testimony to this, as water ran through the buildings during construction and the road was covered in sludge.</p> <p>The construction of the flood alleviation works ran over time and budget and were shoddily 'completely' to the point where the very residents who were to benefit from the works were fed-up and formed a resident's group. There is little appetite for further construction works in any form across the town.</p> <p>Will drainage studies be done on existing housing estates as to assess the impact. Even with the flood alleviation works, there is a noticeable increase</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely</p>

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	<p>in surface water when we have just a few days of rain. This will of course be further exasperated with fields being built on and climate change.  <a href="https://www.theguardian.com/uk-news/2020/feb/17/uk-must-prepare-for-more-intense-storms-climate-scientists-say">https://www.theguardian.com/uk-news/2020/feb/17/uk-must-prepare-for-more-intense-storms-climate-scientists-say</a></p> <p>Public Amenities</p> <p>The report states ‘Strategic development in Thatcham will bring considerable benefits to the town, not only in the provision of new housing, including affordable housing, but in the provision of new schools, community facilities and recreational provision.’ Can you please provide detail as to the ‘Community Facilities and recreational provision that would be provided as the report does not detail this and also how in future they would be funded, particularly with the existing facilities having such limited funds and rely on charitable donations.</p> <p>Our current leisure amenities at Kennet Leisure Centre are desperately underfunded, and building further ‘amenities’, in the new development offers nothing to existing residents.</p> <p>Our existing public right of way will be lost in the new development - we do not need ‘public green spaces for all to use’ - we have the countryside. <a href="https://www.bbc.co.uk/news/health-38520092">https://www.bbc.co.uk/news/health-38520092</a></p> <p>At present our library, toilets, youth services and leisure centre are desperately underfunded and barely accessible. <a href="https://www.newburytoday.co.uk/news/news/31897/funding-pledge-to-support-thatcham-library-for-another-year.html">https://www.newburytoday.co.uk/news/news/31897/funding-pledge-to-support-thatcham-library-for-another-year.html</a></p> <p>Healthcare</p>	<p>infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Comments on the provision of facilities on site are noted, local centres which provide local retail facilities and small-scale employment space will be provided on site as well as a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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	<p>We have no A&amp;E department at our local hospital, no maternity unit and waiting times for routine doctors appointments is in some cases are 12 weeks, pre Covid.</p> <p>Environment</p> <p>The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent.</p> <p>Thatcham Vision found residents in favour of Brown Field development.</p> <p>There is no commitment to net-zero carbon mentioned in the report.</p> <p>Please advise where can the environmental impact study be viewed?</p> <p>Also, to quote the councils Environment strategy 2020-2030 document, on page 13 states "Protect our environment for future generations" as one of the key elements of the Vision for the West Berkshire Environment in 2030. Additionally, on page 15, one of the Strategic Objectives to Deliver the Environment Vision is "Maintaining and enhancing our green and blue spaces and encourage people to use it". The strategy for The Path to a Greener West Berkshire in 2030 on page 21 has a key theme on Protecting and Enhancing our Natural Environment.</p> <p>Our existing public right of way will be lost in the new development. (<a href="https://www.countryliving.com/uk/wildlife/countryside/a757/reasons-to-go-for-a-walk/">https://www.countryliving.com/uk/wildlife/countryside/a757/reasons-to-go-for-a-walk/</a> )</p> <p>I'm intrigued as the comment made by Hilary Cole regarding the vision that less commuters will be about following the trend that Covid-19 has brought more homeworking. There are several studies that show that the decline has been brought forward by 5 years due to the pandemic, with more flexible working. Therefore there is likely to be more brownfield sites with large offices closing and the trend to towards smaller hub offices. Thus, large</p>	<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>All LPR Evidence base documents can be viewed <a href="#">here</a>.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p>



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	<p>office complexes – such as Bayer in Newbury already vacant will remain empty. Before planning on destroying the countryside should a detailed review of current empty commercial areas be conducted to ensure all potential brownfield areas are fully considered?</p> <p>Transport</p> <p>Traffic is already congested at the Floral Way and Siege Cross Roundabouts– right down to the train station. Quite frequently during peak rush hour times , cars queue up Floral Way from before the Mill House roundabout and can struggle to get out from Foxglove Way onto Floral Way. The area is further congested with Francis Baily school run traffic and the new ‘Orcas’ which are an accident waiting to happen. HGV’s travel in these areas all day, every day, due to the distribution centres in Pipers Way – the addition of more housing will make this worse. Northfield Road, Park Lane and particularly Harts Hill Road have already become rat-runs to avoid these roundabouts and the A4. The addition of such a large number of dwellings and increase in cars c3,400 based on the average of 1.4 per household (<a href="https://www.nimblefins.co.uk/number-cars-great-britain#:~:text=How%20many%20cars%20are%20there%20per%20household%20UK%3F,per%20household%20in%20the%20UK">https://www.nimblefins.co.uk/number-cars-great-britain#:~:text=How%20many%20cars%20are%20there%20per%20household%20UK%3F,per%20household%20in%20the%20UK</a>). Would heavily add to the already congested roadways in such a small area. And with their no possibility of having a bridge over the railway this will vastly increase the queues when the barrier is down, which can frequent up to 20 mins – leading to queuing traffic up to the A4.</p> <p>There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters.</p> <p>Economy</p> <p>Thatcham has limited high-quality jobs; a high proportion of residents are self-employed or commute out of the area. In recent years three major</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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	<p>banks have pulled out of our High Street, and pubs are unsustainable. The pandemic has only exasperated the problem with even fewer local amenities.</p> <p>Please refer to response to Q2 in line with each comment.</p> <p>With the forthcoming Census next month (March 2021) would it not be more prudent to wait and review the true data from that before creating the Local Plan Review? “Information from the census helps the government and local authorities to plan and fund local services, such as education, doctors’ surgeries and roads”</p>	<p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>
Jacquie Hamilton (lpr1263)	<p>I would like to formally register my opposition to this planning proposal.</p> <p>As a resident of Upper Bucklebury I feel the development will increase pressure on local infrastructure.</p> <p>I believe traffic pressures will increase beyond Thatcham and the development will create a flood risk to my family who live off Pipers Way.</p> <p>Additionally the rural nature of the local environment and tranquillity of Blacklands Woods will be destroyed.</p> <p>I have lived in Newbury for 20 years and have always loved the character and nature of the area. A development of this scale will create a ‘New town’ similar to the outskirts of Didcot at the edge of Thatcham and turn Newbury into a satellite of London like Stevenage, Harlow, and Basildon.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>

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		<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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		<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Adam Phillpott (lpr1264)	<p>I have been trying to register my comments on your website and am unable to get out of a loop of have you registered to actually logging in. As a consequence I am emailing you directly as an alternative. <b>For the record I am objecting to the proposed development of SP17.</b></p> <p>I am extremely concerned at the scale of the development in Thatcham NE it is simply too large for the receiving town of Thatcham and neighbouring areas.</p> <p>Thatcham is not a cohesive community today. Its haphazard development over time without sufficient social planning as a consequence is no social cohesion and has severe social problems in a number of areas within it. Today's lack of social integration will be exacerbated by the scale of this additional development.</p> <ul style="list-style-type: none"> <li>• The impact on local amenities will be unsustainable when it's so large – whilst the plan includes them I very much doubt they will be built first whether its the countryside, shopping, transport, education, church, policing or healthcare.</li> <li>• The proximity of the development to the Wessex AONB.</li> </ul> <p>The AONB falls within 100 metres of the proposed development. The pollution (noise, chemical, rubbish, light, air and dust as well as human physical presence) will cause huge disruption and permanent damage to the ecosystems that sustain fauna and flora. Outside the AONB but within the development and immediately along side it are copses and ancient</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>woodland and blessed with a fantastic biodiversity. Woodland ecosystems do not begin or end at the last tree but extend way beyond it to the scrub and grassland for hundreds of metres. This includes large mammals such as Roe deer, Muntjac's, Badgers and Hares. Small mammals such as field mice, dormice, voles, moles, hedgehogs and numerous bats. Birds including Sparrow Hawks, Kestrels, Red Kites, Buzzards, nuthatches, tree creepers rarer birds including Nightingales, Nightjars, skylarks, woodlarks, fly catchers all of which feed in the surrounding fields – which in turn attract seasonal wildfowl and winter migrants. This would vanish through the proximity of this development. Sadly I am not a botanist and apart from bluebells, rare fungi and ferns I cannot describe these at all well. Can you ensure that an independent ecologist, botanist and zoologist review these woodlands and escarpments. In addition to the AONB there is:</p> <ol style="list-style-type: none"> <li>1. Burdens Heath</li> <li>2. Long Grove Copse</li> <li>3. Big Gully</li> <li>4. The Plantation</li> </ol> <p>Disruption to Upper Bucklebury which centre is closer than Thatcham of this development. Upper Bucklebury has limited facilities and will be swamped by the scale of this development. (It will be a short walk up Long Grove.)</p> <p>The housing demand calculation does not take into consideration birth rates (down to 1.6) the reduction in EU immigration following BREXIT or indeed sadly the mortality rate post COVID 19.</p> <p>The next points are queries:</p> <ol style="list-style-type: none"> <li>1. The DEPZ zones appear incomplete. AWE and Burghfield DEPZ are mentioned but not RAF Welford and Harwell. (Indeed is there a legacy from Greenham Common). Can you advise where these are in West Berks?</li> </ol>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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	<p>2. Can you advise on how the housing demand calculation takes into account the AONB, DEPZ zones and floodplain?</p> <p>3. Is there a conflation of issues for education and health into the planning document between this development and need for additional schools and health centres in West Berks? If this is being seen as a way of funding these needs then this needs to be stated.</p> <p>4. Have you spoken to councils with similar constraints – AONB, flood plains, MOD land (DEPZ equivalent) significant landowners eg. Purbeck Council?</p> <p>I do think that perhaps some coordinated thinking with other councils living having to work with Government requirements where they have extremely restricted space would ensure that a consistent workable solution can be presented to Government. Whether its building on floodplains – with the additional cost of flood defences or being structurally sound for flooding.</p> <p>However more than anything I think that our villages could add more housing within them and towns requirements for shops (Debenhams and John Lewis have already gone in Newbury) and offices falling vacant (home working meaning empty office blocks) will mean that there is a lot of property ripe for conversion.</p> <p>However more than anything I think that our villages could add more housing within them and towns requirements for shops (Debenhams and John Lewis have already gone in Newbury) and offices falling vacant (home working meaning empty office blocks) will mean that there is a lot of property ripe for conversion.</p>	<p>Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>RAF Harwell is located outside of the administrative area of West Berkshire close to Chilton and RAF Welford is located within West Berkshire north of the M4 close to the village of Welford.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless</p>

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		<p>exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The Council works alongside other local authorities as part of the duty of cooperate, a Duty to Cooperate Topic Paper will be produced to support the plan.</p>

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<p>Sarah Staig (lpr1266)</p>	<p>I am writing to object to the planning proposal for 2500 house to be built to the NE of Thatcham. Thatcham does not have the infrastructure to support this volume of new houses. Dr's surgeries, schools especially the secondary school do not have the capacity or infrastructure to support all the children that would live in these houses. Kennet School is already an extremely large school with 1800 pupils and is already in need of new buildings to replace temporary building that have become not so temporary. The A4 already gets congested with traffic entering Thatcham, these houses would only exacerbate the problem.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The</p>



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		modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Claire Bowden (lpr1269)	<p>I would like to register my objection to the proposed development of farmland for 2,500 houses between the A4 Thatcham and Upper Bucklebury.</p> <p>I am a resident of Upper Bucklebury, and have been for most of my life. Whilst the housing in Thatcham continues to increase at a rapid pace, the development of the infrastructure remains static, and it is already inadequate. More and more the main road through Upper Bucklebury is used as a “rat run” between Thatcham and Reading, the congestion around the railway bridge is terrible and whilst I appreciate the demand for housing is high, surely a new development the size of Hungerford in this location is unsustainable and severely detrimental to local residents.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected</p>

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		increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Edward Asprey (lpr1279)	<p>I am writing to express in the strongest terms my opposition to the proposed housing development to the North of Thatcham.</p> <p>The effects of this proposal would be devastating for the town of Thatcham and I imagine there will be plenty of objections from its residents; but there will also be a knock on effect in the surrounding area. Chapel Row and Bucklebury village are on the periphery of the affected area so I cannot be accused of being a NIMBY.</p> <p><b>Do we need it?</b></p> <p>I understand the need for development and accept that we must build more homes, but I question the need to build as many as 2500 in Thatcham, irrespective of current targets. It seems a totally disproportionate allocation in an area where so little of the land is developable due to AONB and flood plains. The plans would have been in place well before the Covid pandemic, so would it not be sensible to review the requirements given the changing nature of our demographics and working patterns since then? If the plan was to house commuters to London, who knows how many will still want to, or be required to, work in London (or in any office) post-Covid? If the work pattern continues to favour a work-from-home arrangement, then who will be coming to live in these houses? Also, with the birth rate dropping and local primary schools not filling all classes in some year groups, will we see half empty classrooms in the proposed new school(s)? It will be more likely that the school(s) will not get built at all.</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

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	<p>If, however, these new houses were purchased by keen commuters and assuming people returned to office work in London, I would be curious to see what plans are in place at the station to accommodate the hundreds of extra cars that would need to be parked there. Not everyone will be walking to the station and the facilities there would just not be adequate.</p> <p><b>Amenities</b></p> <p>New schools, together with shops and other leisure facilities, are part of the proposed plan. However, it is not clear at what stage these facilities will appear. Unless they are built first, there is the risk they will not be built at all since anyone already living in the new houses will necessarily have already found a school solution for their children. If the provision of infrastructure such as schools is dependent on house sales then we have a potential chicken and egg situation; schools will not be built until houses are sold, but houses will not be bought until there is a school built. If there is little perceived demand and with dwindling budgets at the end of the project, the schools may well not materialise.</p> <p><b>Impact on Upper Bucklebury, Bucklebury Village, Cold Ash, Chapel Row, Bradfield Southend and the surrounding villages and countryside.</b></p> <p>It is impossible to overestimate the negative impact this development will have on the whole area of the Parish of Bucklebury and Upper Bucklebury in particular.</p> <p>Whichever way you look at it, with the development creeping up the hill, Upper Bucklebury will all but merge with Thatcham, separated only by a small copse at the end of Long Grove. This cannot be a good thing for the identity of our village and for the peace, tranquillity and security of our community.</p>	<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual</p>

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	<p>The new Thatcham development and Upper Bucklebury would be linked via the footpath that currently runs from Long Grove to Colthrop. This has already seen increased footfall since the pandemic and will only increase with the new development as residents choose to walk, exercise dogs, ride bikes to the countryside to the north via Upper Bucklebury. Are the residents of Long Grove expected to continue to repair and maintain their road for the benefit of non-parishioners?</p> <p>The inevitable increase of visitors to our village/parish and Bucklebury Common in particular can only have a detrimental effect on our local environment. The ancient woodlands, meadows and wildlife surely need to be protected. Bucklebury Parish Council say on their website: " Loss of habitats or habitat change as a result of inappropriate management are one of the most damaging threats facing rare species in Berkshire. These habitats should be safeguarded wherever possible and appropriate advice sought on managing them to conserve the natural diversity of life and to halt the extinction of species diversity not only in Berkshire but also in the UK. "</p> <p>If this development were to go ahead, these precious woodlands and rare habitats would almost certainly be under threat with a substantial increase in the visitor numbers – our woodlands would be a short hop for the residents of the new development compared to anywhere else in Thatcham and the surrounding area they could walk (or drive!) to.</p> <p>It was interesting to hear in the presentation of the estimated 12% increase in traffic heading up Harts Hill towards Upper Bucklebury. This is already significant on such a dangerous hill, but unfortunately is probably an overly conservative estimate. It will not take long before the increased congestion on the A4 and Floral Way (already congested at peak times) leads to more Rat Run traffic through our village. As well as environmental and noise concerns, many parents will be concerned for the safety of their children in the village especially as they walk to and from school.</p>	<p>and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and</p>

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	<p>This planned development and these two issues of increased traffic and damage to the local environment in particular go completely against the 'Bucklebury Vision' which very clearly emphasises a commitment to maximise rural conservation and protection from pollution, protect the environment for future generations to enjoy, conserve and enhance the natural beauty of the landscape, resist any development that would create unacceptable levels of traffic, and so on. Sadly, I cannot see how this new development fits in with the parish's agreed 'Vision'.</p> <p><b>Country Park</b></p> <p>I do not understand the need for the proposed Country Park. Why we need one at all. We are adjacent to vast Areas of Outstanding Natural Beauty with magnificent vistas and miles and miles of some of the most beautiful walks you could wish for. I can only think it is to make us feel better about the development by creating a natural gap between 'us' and 'them'. The reality is more likely that it is a steep bit of land that would be too difficult and expensive to build on, so it is turned into a 'country park'.</p> <p>It would be interesting to know what this park would look like. Steep slopes do not really lend themselves to informal recreation and I would also be curious to know if budget has been allocated to maintain it long term? All discussions around the county park and its protection seem very unclear and I think more detail and commitment are needed.</p> <p>I am also surprised that there seems to have very little mention of biodiversity, which is surprising with a development of this magnitude. It is my understanding that with any development of this nature, there should be a percentage of net biodiversity gain. There was no mention of this at the presentation of how this would be achieved and it's hard to understand how it could give the amount of farmland that will be given over to housing and other amenities.</p>	<p>the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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	<p>Finally there has been no proper account taken on the effect on traffic and travel amenities. What proposals are there to cope with the extra pressure on Thatcham station and its parking facilities for example.</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Michelle Hunt (lpr1270)	<p><b>Objection to Thatcham Development</b></p> <p>I wish to register my objection to the proposed development to the north of Thatcham for the following reasons.</p> <ol style="list-style-type: none"> <li>1. The developments size and elevated position will have a hugely detrimental impact on the views of and around Thatcham. It will be visible from miles around and will adversely impact the AONB that surrounds it.</li> <li>2. Traffic volumes: The development will generate traffic volumes that the roads and local villages will simply not be able to cope with. 2,500 homes equates to 5,000 cars. The A4 cannot cope with the volume of traffic currently: it will certainly not be able to cope with such a significant increase. This increase in traffic will not just impact the A4 - local villages such as Bucklebury, Hermitage, Cold Ash will also be subject to significant increases in traffic volumes as cars travel to J13 of the M4 for M4 and A34 access.</li> </ol>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p>3. It would join Thatcham with Upper Bucklebury. WBCs own plans state that Upper Bucklebury should retain its own rural identity yet this plan contradicts WBCs own plan. Speeding is a significant issue in Upper Bucklebury (especially Burdens Heath) where children have to walk on the road verge due to the lack of pavements. Drivers regularly speed excessively along this road. This is particularly a problem for Burdens Heath - this development will significantly increase this problem and the danger posed to pedestrians.</p> <p>4. A previous such application was rejected by the Secretary of State in 2017 (<a href="https://www.newburytoday.co.uk/news/news/22045/minister-rejects-two-housing-developments-for-thatcham.html">https://www.newburytoday.co.uk/news/news/22045/minister-rejects-two-housing-developments-for-thatcham.html</a>). Why has the council now spent considerable funds investing in a proposal that has previously been rejected ?</p> <p>5. Councillor Hilary Cole has stated that she is keen to work with the neighbouring villages “because it’s such a big proposal and development for Thatcham”. We have had very little, if any consultation or notice about this! It appears as though WBC are trying to present a fait accompli.</p> <p>6. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). It will simply increase pressures on the roads and services to the detriment of everyone.</p> <p>7. Such a large area of roofs, roads and drive ways will result in significant rainwater runoff down into Thatcham. There is a high probability that this will increase the chance of flooding in Thatcham.</p> <p>8. Impact on nature. This development will destroy much needed habitat for a number of protected species, including the great crested newt, common lizard, adder, grass snake, slow worm and bats. Increasing amounts of cars and people visiting the area of outstanding natural</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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	<p>beauty will have a large negative impact. Wildlife like this need to be protected and not destroyed.</p> <p>Light pollution will also affect the wildlife within the area as well as losing a multitude of footpaths which are currently frequented by Thatcham and Bucklebury residents</p>	
Carol and Colin Doggett (lpr1280)	<p>Overdevelopment of the area and the proposal has not been thought through</p> <p>Infrastructure inadequate. Promises have been made by previous developers to address this problem and nothing has been done and no one has insisted on it</p> <p>Developers have to pay a substantial “Infrastructure Fee” to WBC so that account should be very healthy and could be used to spread this number of new houses around the area and improve the amenities etc</p> <p>AONB – seems no point having this status if it can be ignored at will</p> <p>Utilities insufficient – have only just, after years of demands to Thames Water, got a consistent water supply. A new reservoir would need to be constructed. Where?</p> <p>Medical services inadequate. Would need a new hospital to be 24 hour as well as A &amp; E and GP surgeries. Again, where?</p> <p>Any proposed schools need to cater for ALL age groups</p> <p>Where will all these people work</p> <p>Any affordable housing included should primarily be for LOCAL people</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the</p>



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	<p>Devastating and irreparable damage to Bucklebury and surrounding area – quality of life for the residents, environmental impact and damage to nature and natural heritage.</p> <p>Will no longer be a village. Traffic calming measures installed in Upper Bucklebury because of the volume and speed of traffic caused by the huge amount of development in West Berks now</p> <p>Increased construction and through traffic has made the roads extremely dangerous to walkers, cyclists and horse riders with no regard by drivers for these other road users. Any more houses would worsen the problem. It is not possible to have speed limits imposed</p> <p>There would be a need for leisure facilities – sports centre, entertainment, shops. Where will it all end?</p> <p>We would ask WBC to take into account the terrible effect this development would have on the area and residents and refuse planning permission</p>	<p>benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p>

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		<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy</p>

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		<p>allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be</p>

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		<p>published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Matters dealing within transportation, wildlife and infrastructure have been considered above.</p>
Helen and Peter Kidd (lpr1282)	<p>We would like to register our objections to the West Berks intended build of 2500 houses on farm land between Upper Bucklebury and the A4 and Floral Way.</p> <p>We believe such an over development would massively impact the area, with a loss of rural countryside, pollution, traffic and loss of greenbelt.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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		<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they</p>

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		<p>ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		The site is not within the Green Belt (there is no Green Belt in this District).
Julie and Roger Baker (lpr1283)	<p>We wish to strongly object to the building of 2,500 houses in North East Thatcham.</p> <p>This development would basically join Thatcham to Upper Bucklebury and just spoil a whole area of AONB, which is unnecessary, we need to keep spaces between communities because of wild life and general well being. Thatcham would disappear into an enormous housing estate.</p> <p>These plans were obviously made pre Covid pandemic, before the events that have happened over the last year and surely will no longer be appropriate to our future needs, as our lives have changed so much and we will have to reassess the way we plan for the future, with people working from home and not commuting for a start.</p> <p>Shops are already closing and many are unlikely to reopen, so there are plenty of vacant buildings that can be converted to low cost housing and areas of land no longer required that can be used.</p> <p>The impact on the villages of Upper Bucklebury, Midgham and Cold Ash will be devastating, with increased traffic, added pressure on schools and Doctors surgeries, general increase in Visitors and environmental damage. We therefore oppose this plan.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following</p>

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		<p>developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and</p>



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		<p>walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
Mathew Dorrich (lpr1285)	<p>I would like you to be aware of my objection to the proposed development of 2500 houses along the A4 and Floral Way at Thatcham. My reasons are as follows</p> <ol style="list-style-type: none"> <li>1. The majority of residents are wholly against the proposal but WBC have not sent out enough information regarding the subject. Everybody should be made aware before it goes any further</li> <li>2. It is written in the Bucklebury vision and Bucklebury plan that a green belt should be maintained between Upper Bucklebury and Thatcham, why has this suddenly been disregarded</li> <li>3. What has changed since the rejection of the application in 2017</li> <li>4. It is a ludicrous overdevelopment of beautiful countryside</li> <li>5. There will be a huge impact on traffic in the area. Many routes find it hard to cope with a slight difference in traffic flow, this includes not just the back roads but also the A4 between Thatcham and Newbury</li> <li>6. The development will surround the crematorium which should not be permitted due to the constraints in place</li> <li>7. It is stated that it will help a couple of businesses which certainly does not seem reason enough to go ahead</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control.</p>

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		<p>The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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		<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess</p>

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		<p>the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>
Elaine Well (lpr1284)	<p>I wish to lodge an objection to the proposed development of 25000 houses between Upper Bucklebury, the A4 and Floral Way Thatcham.</p> <p>As a resident of Upper Bucklebury for over 30 years I have witnessed, due to the expansion of Thatcham, the gradual deterioration of a beautiful rural village and way of life. Apart from the obvious impact on schools, doctors surgeries, local hospitals, green space, infrastructure, waste recycling and air pollution, I detail below the detrimental effect the expansion of Thatcham has already been felt by Bucklebury residents:-</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the</p>

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	<p>1. The traffic between Theale and Thatcham via Bradfield Southend, the Avenue of Oaks and Upper Bucklebury has increased 100 fold in recent years reaching 65mph plus regularly. The road surface deteriorates rapidly owing to the size of the lorries now using this avoidance of the A4. This route is also used by Thatcham residents as a short cut to Junction 12 of the M4.</p> <p>2. The traffic from the A4 using Upper Woolhampton and Carbinswood Lane and on through Upper Bucklebury as another rat run to Thatcham has also increased the flow of traffic and deterioration of road surfaces. One has to remember that this is a country lane and accordingly appropriate restrictions should be placed on it, not least of which is vehicle size and permitted speed.</p> <p>3. The volume of traffic noise and pollution already generated by nos 1. and 2. has already reached unacceptable levels at times. Any further increase and Bucklebury will no longer be termed 'rural'. We are already witnessing the decline in birds and wildlife.</p> <p>4. Despite the works carried out at Harts Hill Road Pumping Station, Bucklebury residents continue to experience supply problems from time to time, not to mention the not infrequent power cuts. I can only imagine the impact a further 2500 households will have.</p> <p>5. We are currently in the middle of a Pandemic. The UK is in an economic crisis, businesses are collapsing and there is mass unemployment. Perhaps now is not the time for WBC to be considering such a move when so much financial help will be required to help people restart their lives and businesses.</p> <p>Bucklebury is considered to be an Area of Outstanding Natural Beauty. A quiet country village (albeit not as quiet as it once was) please let it remain so. We have no wish to become part of suburbia and witness the further</p>	<p>highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p>

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	<p>decline of an historic rural area which should be preserved for local people and future generations to enjoy.</p> <p>I am sure there are many more relevant objections to this proposed development but I hope you will take the time to consider some of mine and my neighbours.</p> <p>I thank you in anticipation.</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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		With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.
Stephanie Molloy (lpr1286)	<p>Objection to proposed development of 2500 houses along A4 and Floral Way at Thatcham.</p> <p>I strongly object to the proposal to build 2500 House along the A4 and Floral Way in Thatcham, for the following reasons:</p> <p>1: Reduction in the strategic gap between the settlements of Thatcham and Upper Bucklebury.</p> <p>2: This is allowing urban sprawl - is the plan to join Thatcham, Cold Ash, Upper Bucklebury, Midgham and Woolhampton into one conurbation? Adding 2,500 homes is like adding the town of Hungerford onto the side of Thatcham. What ever happened to not building on the green belt? Many years ago when I told my father I was moving to Thatcham, he said it was a lovely pretty village, surrounded by green fields. I asked him when he was last here. Oh after the war he said! When he came to our then property in Thatcham he could not believe the change and was concerned it was now just part of Newbury. This cannot happen to the rest of Thatcham and it's surrounding villages, especially Upper Bucklebury and Cold Ash.</p> <p>3: Infrastructure impact - Road Traffic - Thatcham is already full of traffic, not just at peak times, adding 2,500 homes, with at least one car (but more than likely two cars per household) will add a minimum of 2,500 cars to the roads. A major increase in traffic along Harts Hill, Coxs Lane, etc., and any other cut through people use as they try to get onto the A4, will be heavily</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

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	<p>impacted to the detriment of the roads themselves; lifestyles of those living on those roads and congestion not just at peak times.</p> <p>4: Infrastructure Impact - Railway Crossing - This is already not fit for purpose, having been designed when there was light traffic in the area. No plan to increase any domestic dwellings in Thatcham should go ahead until the crossing situation is fixed.</p> <p>5: Infrastructure Impact - Schools - The suggestion is to build 3 new schools - how many are secondary schools, as Kennet School is already full, and The Downes has changed its catchment area so young people from Upper Bucklebury can go there instead just down the road. Traffic and impact on the neighbouring village schools needs to be seriously looked at too to stop them being overwhelmed and unable to offer places to children of their own village.</p> <p>6. Infrastructure Impact - Doctors - All the Doctors practices are over stretched - not just because of COVID-19 - even with the current triage and use of new technologies it is difficult to get to see a Doctor on the day you need them. This needs to be factored in, in any development plan for Thatcham.</p> <p>7. Infrastructure Impact - Water and Sewage - The local system is being managed on a daily basis by Thames Water. Woolhampton is already full with no plans to increase capacity - what is the situation in Thatcham? An additional 2,500 homes will require a lot of new pipework to get it to Lower Way safely, with months (if not years) of upheaval and disruption to local residents.</p> <p>8. Infrastructure Impact - Rubbish, Landfill and Recycling - We all know this will be impacted, you only have to look at the current situation. What are the plans for doing this correctly and recycling more. Fly tipping on Bucklebury Common is rife and all the good people who go common clearing or litter</p>	<p>infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



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	<p>picking, are only able to scratch the surface as our beautiful village land is used as a rubbish dump.</p> <p>9. West Berkshire declared a climate emergency on 2 July 2019.</p> <p><a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summarydocument-January-2020-pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy - 2020-2030- Summarydocument- January-2020-pdf/WBC_ Environmental_Strategy_Summary_A4_20.pdf? m=637141844400230000</a> WBC - Environment Strategy - with declaration of climate emergency. How will this be mitigated by increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and urbanisation.</p> <p>10. WBC Refusal for Application 15/00296/OUTMAJ Siege Cross Farm Thatcham - The proposal to build 495 dwellings was refused by WBDC, not least for being contrary to the Development Plan, the impact it would have on Education, the Landscape and Visual impact it would have and Planning Obligations. If 495 were refused how can 2,500 be being considered? <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/ very-strong message-to-developers-after-thatcham-appeals-turned-down.html</a></p> <p>11. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”.</p> <p>12. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West Berks is AONB. WBC have previously built on AONB and AONB status can</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated</p>

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	<p>be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</p> <p>13. It will completely surround the Crematorium at Thatcham which was placed there to be away from residential properties and has constraints placed on it.</p> <p>14. Have WBC considered the reuse of brownfield sites to house these 2,500 homes? Better use of Thatcham town centre, a review of the use of property should undertaken in light of the changes that have taken place since the COVID-19 disruption.</p> <p>15. Flooding - Remember 20 July 2007? Most of Thatcham was impacted as it is built on a flood plain. If you were to build on the land proposed where does all the water go? If you remember the A4, Midgham and Woolhampton were badly impacted too by this flooding.</p> <p>The proposal is overdevelopment of Thatcham, which is already struggling to cope. It is out of character and will have a detrimental impact for the surrounding villages, the A4 and to the town itself. There is insufficient parking in the town, limited parking at the train station and already almost full train services at peak times into London. Doctors are stretched. Floral Way is used as a way to get round the town, as it is too painful to drive through it, with all the traffic lights. This will only get worse.</p> <p>The surrounding countryside is full of natural beauty, fauna and flora, which should not be disturbed. Walking on the land between Upper Bucklebury and Colthrop last summer, we saw orchids and other wild flowers with plenty of bees and butterflies to feed on them. Do not be responsible for destroying this beautiful habitat.</p>	<p>water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West</li> </ul>

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	<p>Reading the BBC News Website today, there is an article by Prof Sir Partha Dasgupta, of the University of Cambridge, who has written a review for the Government. He states:</p> <p>"Truly sustainable economic growth and development means recognising that our longterm prosperity relies on rebalancing our demand of nature's goods and services with its capacity to supply them,". "It also means accounting fully for the impact of our interactions with nature across all levels of society." <a href="https://www.bbc.co.uk/news/science-environment-55893696">https://www.bbc.co.uk/news/science-environment-55893696</a></p>	<p>Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</p> <ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core</p>

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		<p>Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>

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		<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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		<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Carol Newby (lpr1290)	<p>I am writing to strongly object to the proposed development.</p> <p>The land north of Floral Way has maintained the gap between Thatcham and Bucklebury thus ensuring a rural environment essential to the community's overall wellbeing. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. This contravenes well established planning norms which have been consistently applied in the recent past. It is incomprehensible that its loss is now proposed.</p> <p>The proposed development abuts Bucklebury Common and the North Wessex Downs AONB. This development will have a lasting and negative impact on these special environs. Bucklebury Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. The plants in and bounding the AONB will suffer and the Common will be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles, which will inevitably increase with the proposed development adjacent to it.</p> <p>In addition, the proposed development on a sloping site with associated runoff from concrete and tarmac paved paving and road surfaces will inevitably contribute to a greater risk of potential future flooding events along the river valley (A4/Bath Road and Thatcham).</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be</p>

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	I look forward to your urgent and detailed response to this objection.	<p>published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
David Newby (lpr1291)	<p>I am writing to strongly object to the proposed development.</p> <p>The land north of Floral Way has maintained the gap between Thatcham and Bucklebury thus ensuring a rural environment essential to the community's overall wellbeing. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. This contravenes well established planning norms which have been consistently applied in the recent past. It is incomprehensible that its loss is now proposed.</p>	The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.



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	<p>The proposed development abuts Bucklebury Common and the North Wessex Downs AONB. This development will have a lasting and negative impact on these special environs. Bucklebury Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. The plants in and bounding the AONB will suffer and the Common will be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles, which will inevitably increase with the proposed development adjacent to it.</p> <p>In addition, the proposed development on a sloping site with associated runoff from concrete and tarmacadamed paving and road surfaces will inevitably contribute to a greater risk of potential future flooding events along the river valley (A4/Bath Road and Thatcham).</p> <p>I look forward to your urgent and detailed response to this objection.</p>	<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
<p>Alan Evans (lpr1292)</p>	<p>I would like to vehemently object to the ridiculous idea of dumping 2500 houses between Thatcham and Upper Bucklebury.</p> <p>This is totally the wrong place to build what is virtually a new town, Both Thatcham and Upper Bucklebury have absorbed many new houses recently and apart from the odd one or two this should be the lot for this area.</p> <p>The increase in traffic, and pressure on services alone is enough, Our water supply alone has just had a lot of work done including a new pump at the bottom of Hearts Hill Road</p> <p>This took over a year to complete and the pressure is not that great even now.</p> <p>Also I am sure that any residence on that site would not appreciate the emissions from the local Crematorium.</p> <p>The only thing on this site should be agriculture or tree planting to absorb some of the carbon that exists even in this area.</p> <p>Think of the future and drop this stupid idea.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

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		<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>LPR policies SP5 Responding to Climate Change and DM4 Environmental nuisance and pollution control deal with emissions. The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p>

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Andree Goodall (lpr1293)	<p>As a resident of Upper Bucklebury I would like to register my objections to the proposed 2500 houses along the north side of the A4 and Floral Way Thatcham.</p> <p>My Husband and I moved to Upper Bucklebury in 2006 and have thoroughly enjoyed living in this rural village and community.</p> <p>Whilst I accept the need to develop houses to accommodate the growing population, I feel there are many shortcomings with this proposal.</p> <p><b>My Reasons for Objection are :-</b></p> <ol style="list-style-type: none"> <li>1. This proposal will significantly diminish the rural identity that the residents in the village of Upper Bucklebury currently enjoy.</li> <li>2. The area proposed is an area of outstanding natural beauty that provides wonderful views for residents from the village and surrounding areas.</li> <li>3. There will be a significant loss of farm land in the area</li> <li>4. Wildlife would be significantly impacted by this proposal</li> <li>5. 2500 houses would mean a likely 2500 plus additional cars using the local road network every day, which is already poorly maintained and inadequate for this level of increased use.</li> <li>6. The A4 is currently the main artery connecting Thatcham to Newbury and is already very congested. The additional traffic generated from this proposed development will significantly increase this congestion causing drivers to find alternative routes flushing more traffic through local villages</li> </ol>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a</p>

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	<p>and unsuitable roads with increasing risk of life to pedestrians particularly children, cyclists and horse riders.</p> <p>7. A proportion of the new residents are likely to travel south east towards Basingstoke or south towards Winchester via the Thatcham level crossing. I often use this crossing myself and have been caught in a que as far back as the old Sony building. With a wait time of over 30 mins. This area would become completely congested with the increased traffic as a result of this development and its location.</p> <p>8. The additional traffic in the area of Thatcham station would increase the danger to school children as the network of roads become totally congested.</p> <p>9. There have been issues with flooding to many of the areas on the south boundary of the proposed development. Despite significant work being done to alleviate the possibility of flooding surely this proposal would significantly increase hardstanding areas and surface water leading to further flooding risk.</p> <p>10. The proposed development seems disproportionate for the area and current infrastructure, i.e. :- Schools, Doctors, hospital, water supply, road network .</p> <p>11. Despite government plans for greener transport solutions this proposal will have an environmental impact to this area with increased pollution.</p>	<p>landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural</p>

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		<p>routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
<p>Brian Goodall (lpr1294)</p>	<p>As a resident of Upper Bucklebury I would like to register my objections to the proposed 2500 houses along the north side of the A4 and Floral Way Thatcham.</p> <p>My wife and I moved to Upper Bucklebury in 2006 and have thoroughly enjoyed living in this rural village and community.</p> <p>Whilst I accept the need to develop houses to accommodate the growing population, I feel there are many shortcomings with this proposal.</p> <p><b>My Reasons for Objection are :-</b></p> <ol style="list-style-type: none"> <li>1. This proposal will significantly diminish the rural identity that the residents in the village of Upper Bucklebury currently enjoy.</li> <li>2. The area proposed is an area of outstanding natural beauty that provides wonderful views for residents from the village and surrounding areas.</li> </ol>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that</p>

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	<p>3. There will be a significant loss of farm land in the area</p> <p>4. Wild life would be significantly impacted by this proposal</p> <p>5. 2500 houses would mean a likely 2500 plus additional cars using the local road network every day, which is already poorly maintained and inadequate for this level of increased use.</p> <p>6. The A4 is currently the main artery connecting Thatcham to Newbury and is already very congested. The additional traffic generated from this proposed development will significantly increase this congestion causing drivers to find alternative routes flushing more traffic through local villages and unsuitable roads with increasing risk of life to pedestrians particularly children, cyclists and horse riders.</p> <p>7. A proportion of the new residents are likely to travel south east towards Basingstoke or south towards Winchester via the Thatcham level crossing. I often use this crossing myself and have been caught in a que as far back as the old Sony building. With a wait time of over 30 mins. This area would become completely congested with the increased traffic as a result of this development and its location.</p> <p>8. The additional traffic in the area of Thatcham station would increase the danger to school children as the network of roads become totally congested.</p> <p>9. There have been issues with flooding to many of the areas on the south boundary of the proposed development. Despite significant work being done to alleviate the possibility of flooding surely this proposal would significantly increase hardstanding areas and surface water leading to further flooding risk.</p>	<p>development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>



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	<p>10. The proposed development seems disproportionate for the area and current infrastructure, i.e. :- Schools, Doctors, hospital, water supply, road network .</p> <p>11. Despite government plans for greener transport solutions this proposal will have an environmental impact to this area with increased pollution.</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in</p>

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		<p>to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Alison Chadwick (lpr1295)	<p>I would like to strongly register my objection to the proposed development of the above sites for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The location of the development on Harts Hill Road will lead to a significant increase in traffic. This increase in traffic will impact many</li> </ol>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development,</p>

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	<p>surrounding villages such as Upper Bucklebury, Cold Ash, Chapel Row and Bradfield.</p> <p>2. These roads already suffer with a high percentage of speeding vehicles. As a resident of Burdens Heath we often see vehicles travelling in excess of 60mph in what is a 30mph zone. The increase in traffic will only worsen the situation and make walking along these roads, which do not have pavements, significantly more dangerous especially when walking our children to school.</p> <p>3. The proposal doesn't address the strains of increased demand on Thatcham train station and the level crossing. The parking facilities at the station are already insufficient to cope with current demand.</p> <p>4. The close proximity of the development to the North Wessex Downs AONB will put an increase strain of this area by having a detrimental impact on all the wildlife that lives in the area. Also, the increase in the number of cars and people visiting the area will have a negative impact on protected species such as the nightjar which live on the common.</p> <p>5. There is already the problem of littering, fly tipping and illegal 4x4 using the byways in Upper Bucklebury. A development of this size will only worsen the problem.</p> <p>6. There is not enough space between the proposed development and Upper Bucklebury and the boundary of the AONB. The village will be basically a part of Thatcham and completely lose its identity.</p> <p>7. The development will significantly increase the noise and light pollution to Bucklebury parishioners.</p> <p>8. There will be a risk of increased flooding with the development.</p>	<p>including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a</p>

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		<p>separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Rob Chadwick (lpr1296)	<p>I would like to strongly register my objection to the proposed development of the above sites for the following reasons:</p> <p>1. The location of the development on Harts Hill Road will lead to a significant increase in traffic. This increase in traffic will impact many surrounding villages such as Upper Bucklebury, Cold Ash, Chapel Row and Bradfield.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without</p>

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	<p>2. These roads already suffer with a high percentage of speeding vehicles. As a resident of Burdens Heath we often see vehicles travelling in excess of 60mph in what is a 30mph zone. The increase in traffic will only worsen the situation and make walking along these roads, which do not have pavements, significantly more dangerous especially when walking our children to school.</p> <p>3. The proposal doesn't address the strains of increased demand on Thatcham train station and the level crossing. The parking facilities at the station are already insufficient to cope with current demand.</p> <p>4. The close proximity of the development to the North Wessex Downs AONB will put an increase strain of this area by having a detrimental impact on all the wildlife that lives in the area. Also, the increase in the number of cars and people visiting the area will have a negative impact on protected species such as the nightjar which live on the common.</p> <p>5. There is already the problem of littering, fly tipping and illegal 4x4 using the byways in Upper Bucklebury. A development of this size will only worsen the problem.</p> <p>6. There is not enough space between the proposed development and Upper Bucklebury and the boundary of the AONB. The village will be basically a part of Thatcham and completely lose its identity.</p> <p>7. The development will significantly increase the noise and light pollution to Bucklebury parishioners.</p> <p>8. There will be a risk of increased flooding with the development.</p>	<p>mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>

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		<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

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		<p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
James Richard Monk (lpr1297)	<p>I strongly object to this disproportionate proposed development in North Thatcham for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The loss of separate identity of Bucklebury and harm to the AONB.</li> <li>2. The destruction of hundreds of acres of pristine farmland and valuable areas of nature together with a detrimental effect on biodiversity.</li> <li>3. Increased light pollution, plus significantly increased traffic leading to increased air and noise pollution.</li> </ol>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>



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	<p>4. The extraordinary expansion of Thatcham by 2500 houses is like adding a town the size of Hungerford amounting to about a 30% increase in size</p> <p>5. The completely inadequate provision of infrastructure for Thatcham as a whole town which already cannot cope - the railway crossing queues, parking in Thatcham centre and at the station plus medical facilities</p> <p>As a resident of Thatcham and Bucklebury for 48 years it seems that the proposed development needs to be completely re-appraised with proper due consideration for all the issues associated with such a disproportionate expansion of Thatcham.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November</p>

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		<p>2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to concerns regarding other forms of pollution, the LPR includes a range of policies including DM4:</p>

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		<p>Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the</p>

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		LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Sue Dobbins (lpr1298)	<p>I'm writing to provide feedback for the NE Thatcham Development of 2500 homes you are proposing as part of the Local Plan Review (LPR) 2020 - 2037 Emerging Draft December 2020 document. As a resident of Upper Bucklebury, I would like to object to this development proposal for a number of reasons.</p> <p><b>Environmental Impact</b></p> <ol style="list-style-type: none"> <li>1. HELAA concluded that there are “high risk of adverse nature conservation impacts” with “areas of ancient woodland and Local Wildlife Sites adjacent to the site.”</li> <li>2. The proposed development will lead to a huge loss of open space which will have a profound impact on wildlife who will not only be forced into a smaller area, squeezed between Upper Bucklebury and the new development in what will largely be a different (i.e. woodland) habitat, but will also be driven into direct competition with other species - we have considerable biodiversity in Bucklebury, of both flora and fauna, and as the delicate balance continues to be eroded, species will be forced to compete, pushing out many of our less hardy species. This goes against the Defra’s biodiversity 2020 strategy which states: <b><i>The mission for this strategy, for the next decade, is: to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.</i></b></li> <li>3. The development also goes against your Policy DC1 where you state: “<i>Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and</i></li> </ol>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be</p>

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	<p><i>natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.”</i></p> <p>4. The Flooding in Thatcham report (2008) that was written following the 2007 floods which affected 1200 homes states: <i>It should also be borne in mind that it isn't just the rain that falls on the built up area of Thatcham that counts. Rain falling to the north, on land between The Ridge and north of the built up area of Thatcham has a major impact. Indeed it was water from this land, draining southward, that largely overwhelmed the drainage system on 20th July 2007.</i> Despite the flood alleviation measure already installed, the proposed development will increase run-off surface water and there are inadequate measures to address this significant risk of flooding.</p> <p><b>Negative Impact on Surrounding Villages &amp; North Wessex Downs AONB</b></p> <p>5. The Bucklebury vision and Bucklebury plan states that there should be a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should therefore be considered as supplementary planning consideration. This is not mentioned in the LPR.</p> <p>6. In your rejection of the Siege Cross development proposal (Feb 2015) that was for just under 500 dwellings you said yourself: <i>‘The development is contrary to guidance in the relevant landscape character assessments, and therefore fails to protect and enhance the local identity and distinctiveness. The development would erode the identity of Thatcham as being separate to that of the surrounding rural settlements.’</i> Why would this be any different now especially with a proposal five times the size of Siege Cross?</p> <p>7. Despite only minor traffic modelling having been undertaken, it is clear that the new development would cause a huge increase in traffic up Harts Hill road and on the rural network in to the villages of Upper Bucklebury,</p>	<p>measured in ‘biodiversity units’, using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and</p>

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	<p>Chapel Row, South End Bradfield and Cold Ash. The impact of this will be more noise and air pollution.</p> <p>8. Upper Bucklebury currently has six street lights. This new development would lead to a huge increase in light pollution – we, like most residents here, chose to live in a village to escape from the significant pollutants that living in a town creates.</p> <p>9. The significant increase in traffic is a safety concern for local residents who already have concerns with speeding through the villages. There are several areas (Burdens Heath, The Ridge and Harts Hill) without pavements and an increase in traffic will make this even more dangerous for pedestrians.</p> <p>10. If there are ever traffic issues on the A4, there is always a noticeable increase in traffic through the village as drivers seek an alternative route to the traffic jams.</p> <p>11. The plans show local shops which could attract some villagers to use these facilities (a further increase in road use) which would have a negative impact on the village shop and if it were to close this would be hugely problematic for villagers who are less mobile and rely on this much needed village convenience.</p> <p>12. Given the proposal for two new primary schools, this could have a profound effect on pupil numbers, and therefore financial viability, of Bucklebury School, the closure of which would be a severe loss to the village.</p> <p>13. Increased use of the Bucklebury Common will cause an increase in litter on the Common and presumably an increase in 4x4 vehicles using the common illegally which is an existing problem here.</p>	<p>adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the</p>

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	<p>14. There is a proposal to build a primary school adjacent to the current crematorium – which is inconsiderate given that the crematorium was built purposefully at the far end of Thatcham to provide peace and tranquillity.</p> <p><b>Inadequate Supporting Infrastructure for Scale of Development</b></p> <p>15. The proposal does not contain any details of a medical centre which would be required for the addition of 2,500 houses – the current healthcare services in the Thatcham area are already oversubscribed. As I understand it, the houses would be built before a new medical centre would be considered meaning that the existing Chapel Row and Burdwood surgeries would be under even more pressure than they already are.</p> <p>16. There is no proposal to address the potential increase in demand for parking at Thatcham train station or additional rail services required to transport more people out of Thatcham each day.</p> <p>17. You state in the Local Plan Review that ‘<i>development would have a very significant impact on the local highway network.</i>’</p> <p>In conclusion, this development is completely unacceptable, lacking in rigour and, to quote a statement written by you in your rejection of Siege Cross – words that are just as relevant, if not more, to this beautiful area you are proposing to destroy: “<i>The proposed development would result in harm to the character and identity of Thatcham and erode the open landscape between Thatcham and Upper Bucklebury.</i>” <b>I strongly urge WPC to reject this proposal.</b></p>	<p>Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants</p>

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		<p>should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>



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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Comments relating to traffic matters have been considered above in this consultation response.</p>

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Deborah Reynolds (lpr597)	<p>This response addresses two major documents which have been issued for consultation at the same time. It makes seven recommendations to address weaknesses in Chapters 3, 4 and 5 of the emerging Local Plan and opposes the housing allocation in SP13, especially SP17 North East Thatcham Strategic site. The SP17 proposal is disproportionately big, poorly sited and would have too great an impact on the surrounding population, infrastructure and environment.</p> <p><b>Chapter 3 Shaping West Berkshire Vision and Objectives</b></p> <p>The chapter on 'Our Vision and Strategic Objectives' need to be strong and future proofed.</p> <p>The vision statement in para 3.4 is welcome and that West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside.</p> <p>However strategic objectives on Heritage, AONB and Green infrastructure do not spell out a compelling vision for nature. Written strategic objectives on nature are sadly lacking. This means the Council's plan lacks ambition for the future and demonstrates no apparent priority is attached to the natural environment, biodiversity or nature conservation</p> <p>It is remarkable that the clear global concerns on biodiversity, species loss, habitat loss and climate emergency, well-rehearsed in section 5, are so condensed into inanimate, inherited and purely visual aspects of our area. The council should aim do far more to respond to peoples concern that this is not only under threat globally but also imperilled by weakness in their own plans.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b></li> </ul>	<p>Although listed in the response here for completeness, comments relating to the 'Vision and Objectives', SP1, SP2, SP11 and SP13 have been considered within the relevant council response policy table and the response has not been repeated in this policy table.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p>

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	<ul style="list-style-type: none"> <li>○ Gives a specific means to deliver the vision of abundant biodiversity across the entire area,</li> <li>○ Holds the council to account for concerns of local people on delivery of Section 5 currently called ‘our environment and surroundings’,</li> <li>○ To be measured by conservation of existing assets and the creation of new ones.</li> <li>○ Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by developers.</li> </ul> <p><b>Chapter 4 Development strategy – our place based approach</b></p> <p>The spatial strategy SP1 and SP2 and supporting text are important. SP1 states: ‘Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements’.</p> <p>However the red-lined envelope depicted in the Thatcham growth study fails to address the necessary separation and is in direct contradiction to this strategy. The separation of Newbury and ‘surrounding rural settlements’ from places identified in the development strategy (e.g. Thatcham regeneration) needs to be strengthened in every aspect of Council thinking and policy.</p> <ul style="list-style-type: none"> <li>● <b>Recommendation 2– The LPR must step up and improve its policy, internal and external guidance on separation.</b> The requirement for a strategic gap, to include buffer zones, with recognition of village visions prepared by Parish Councils is essential. It must ensure that sufficient budget is allocated to meaningful strategic separation by developers in their</li> </ul>	<p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However,</p>

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	<p>appraisals. Pre-commencement conditions must be set to enforce this.</p> <p>SP2 states the proposed arrangement if an application is deemed to be major development with proximity to the AONB and aspects that further consideration will take account. However the consultation on the Local Plan Review and a simultaneous consultation of a detailed growth study, which is clearly a major development, is a seriously flawed procedure. This is confusing to local people who want to express their views, gives the clear message that the parameters in the plan are already fixed and therefore one or other consultation has a predetermined outcome. In addition the time table for two such large consultations is unfair.</p> <ul style="list-style-type: none"> <li> <b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP.         </li> </ul> <p>Spatial strategy SP3 and 4 reflect many aspect of national policy. However there is no evidence that the policy alteration associated with exclusions around AWE Burghfield or Aldermaston have been taken into account centrally, thereby updating the national allocations. Residents can rightly expect the Council to have challenged this at the highest level, including by Judicial Review, before producing a plan B such as the Thatcham development. All the materials in the review predate the dramatic alterations associated with online shopping and the COVID-19 pandemic. Therefore it is clear that the housing allocations are flawed in several respects.</p> <ul style="list-style-type: none"> <li> <b>Recommendation 4 – provide clear evidence of UpToDate national comparable figures for developable land.</b> This must demonstrate that reassessment centrally has been undertaken,         </li> </ul>	<p>a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p>demonstrate the impact of this and COVID-19 are all accounted for in the Local plan review. Set demanding targets for conversion of brown field commercial property to residential.</p> <p><b>Chapter 5 Our environment and surroundings – responding to climate change</b></p> <p>There are several important and strategic statements to emphasise here, in particular:</p> <p>'To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11</p> <p>Ecological distinctiveness – design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11</p> <p>A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings.</p> <p>Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to nature recovery networks.</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November</p>

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	<p>However the absence of the strategic priority reduces their impact and will not ensure their delivery.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b> This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect.</li> </ul> <p><b>Chapter 6 Delivering housing</b></p> <p>SP 13 lists the sites for residential and mixed use in Newbury and Thatcham for sites 1 ha or more. Here it adds in NE Thatcham as SP17 for the first time. This draft local plan review and associated report therefore set out a huge increase in development area and house numbers.</p> <p>There is no justification for such an increase in allocation, and in SP17 the proposal of 2500 houses is completely disproportionate for Thatcham and surrounding areas. In the opinion of Bucklebury Parish Council the figures are flawed and therefore withdrawal for a fundamental review and meaningful justification is essential.</p> <p>The impact on the local setting and breach of the Floral Way boundary, objections raised by the North Wessex AONB, are not addressed. No case has been made for ribbon development and the ‘Colthrop village’ concept is a completely unacceptable joining up of Midgham and Bucklebury Parishes with Thatcham and should be removed from any future considerations.</p> <p>Any housing allocation must demonstrate local benefits to the natural environment.</p> <p>The model for infrastructure provision is dependent on realising house sales, therefore is not ‘baked-in’ or inevitable. A transparent, enforceable</p>	<p>2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in ‘biodiversity units’, using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>The documents which sit behind the LPR are known as the evidence base and these are technical documents which the Council will use to justify the formation of policy and will form part of the Examination Library when the LPR goes through the LPR. The Thatcham Growth Study is a published document.</p>

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	<p>commitment to ensure fair share of profit and investments in local assets is an essential pre-commencement commitment which should be policy for any development.</p> <p>The level of ambition for infrastructure provision and biodiversity gain is insufficient. No budget is allocated to achieving 10% biodiversity gain in the appraisal of viability, the design features do not demonstrate any input from conservation professionals, nationally or locally.</p> <p>Green and biodiverse are not equivalent. The concept, beneficiaries and impact of a new strategic country park are unclear. Any future consideration of the idea must make clear that is outside the area of allocation and protected in perpetuity.</p> <p>If land at 'Colthrop village' is no longer needed for farming it should be entirely devoted to biodiversity net gain and used to establish a fully functional wildlife corridor between the Kennet valley and Bucklebury heathland.</p> <p>Numerous aspects of the Bucklebury vision have been ignored. It is appears that the views of residents on the edge of the proposed area were either not sought or not taken into account.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 6 – SP13 is unacceptable and needs alteration, particularly removal of the proposed NE Thatcham line item.</b> All the reasons are set out above and in the Bucklebury Parish Council and Thatcham Town Council submissions.</li> </ul> <p><b>SP17 North East Thatcham Strategic site allocation</b></p> <p>SP17 sets out that 'The Council will be supportive of proposals which have regard, and positively respond, to the master-planning work contained in the Thatcham Strategy Growth Study (2020)'. It then lists features the NE Thatcham Strategic allocation may be expected to deliver. However the</p>	

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	<p>residents of Bucklebury and Thatcham do not see it that way and their responses should give the Council grave cause for concern. The main objections are listed below:</p> <ul style="list-style-type: none"> <li>• Flawed housing demand analysis</li> </ul> <p>The analysis of housing demand predicating this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking WBC’s own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed.</p> <ul style="list-style-type: none"> <li>• Strategic Gap</li> </ul> <p>A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed.</p> <ul style="list-style-type: none"> <li>• Traffic</li> </ul> <p>A development of the scale proposed will generate considerable traffic but the analysis in the proposal underestimates the volume and impact on the Parish. It is assumed that the bulk of the new traffic will use the A4, accessed via Floral Way. However, the A4 is already overloaded at peak times and new residents will look to find alternative routes. These inevitably will be through the Parish for those looking to access the A34 and the M4. The roads through these villages are ill suited to additional traffic; they are rural, single carriageway roads mostly lacking footpaths and featuring blind</p>	



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	<p>bends. Speeding is a well known problem in the Parish and more cars will make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and will endanger children walking to school.</p> <ul style="list-style-type: none"> <li>• AONB and Bucklebury Common</li> </ul> <p>It is clear that the proposed development to the north-east of Thatcham involving 2500 houses would have a big influence on the local wildlife.</p> <p>The proposed development abuts Bucklebury Common and AONB. This development would have a lasting and negative impact on these special environs. The impacts fall into two categories; those that impact the AONB directly and those resulting from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. Importantly the plants in and bounding the AONB will suffer and the Common will be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles. The visitor numbers, from the proposed development, would exacerbate damage to a struggling ecology.</p> <p>Bucklebury Common, one of the few remaining areas of lowland heath lies just a kilometre or so to the north-east. It is well known for some special birds in particular the nightjar, but also the woodlark, tree pipit, stonechat and woodcock. These nest on the ground are very susceptible to disturbance especially by dogs. The development would put much more pressure on the heath and make successful breeding of these species much less likely.</p> <p>So the council's attention should focus on this impact of the proposed scheme not highlighted in the Biodiversity and Green infrastructure. Just visible at the north east edge of the plan on page 36 is the edge of Bucklebury Common, the eastern portion of which (east of the settlement of</p>	

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	<p>Upper Bucklebury) is an area of lowland heath, which has been restored by conservation management. This site is already subject to considerable recreational pressure. Heathland is a priority habitat identified in the Berkshire Local Nature Partnership Biodiversity Plan, and holds breeding populations of two of the priority species in the plan, Nightjar (<i>Caprimulgus europaeus</i>) and Woodlark (<i>Lullula arborea</i>). Another species on the UK's list of "Red Data" birds, Woodcock (<i>Scolopax rusticola</i>) also occurs, a species which has suffered a dramatic contraction in its UK breeding range (more than 50% in the 25 years to 2010) and numbers. These are ground nesting birds, vulnerable to disturbance. The wider area forms one the Berkshire's Biodiversity Opportunity Areas (BOA), known as Bucklebury Plateau (see - <a href="http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf">http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf</a>)</p> <p>As no doubt the council is aware, lowland heath is a threatened habitat important for a number of species of wildlife. Its global distribution is limited, with the UK having about 20% of the world's remaining area. About 80% of the UK's lowland heath has been lost since 1800. The Thames Basin Heaths of north Hampshire, west Surrey and south east Berkshire are an area of Special Protection (SPA) and now benefit from planning policies requiring the provision of suitable areas of natural greenspace (SANGS) as mitigation for any new residential development within 5 km of the heathland areas.</p> <p>In this case the site would introduce 2500 new households almost all within 2 km of Bucklebury Common, and we consider that mitigating the impact of the increased recreational pressure, and the opportunity to enhance biodiversity should have formed part of the scheme, consistent with current Local Plan Policy CS17, emerging policy SP11 and NPPF paragraphs 170 and 175.</p> <p>The restored area of Bucklebury Common referred to above is currently a relatively small fragment of heathland maintained by voluntary effort. It does though form part of a larger area within the Bucklebury Plateau BOA</p>	

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	<p>extending to the west of Upper Bucklebury that has potential for habitat restoration as heathland.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 7 – remove SP17 from the Local plan review.</b></li> </ul> <p><b>Conclusion</b></p> <p>In summary, I have serious concerns about the emerging draft Local Plan which can be addressed through adoption of the seven listed recommendations. Otherwise the impact on West Berkshire, Thatcham and especially the village of Upper Bucklebury will be very damaging. With increased traffic, a steady flow of visitors the consequential damage to the local environment, the character of our area would change forever and not for the better.</p> <p><b>Response to consultation by West Berkshire Council on Emerging Draft West Berks LPR and Thatcham Growth Study Stage 3 report by David Lock Associates</b></p> <p>This response addresses two major documents which have been issued for consultation at the same time. It makes seven recommendations to address weaknesses in Chapters 3, 4 and 5 of the emerging Local Plan and opposes the housing allocation in SP13, especially SP17 North East Thatcham Strategic site. The SP17 proposal is disproportionately big, poorly sited and would have too great an impact on the surrounding population, infrastructure and environment.</p> <p><b>Chapter 3 Shaping West Berkshire Vision and Objectives</b></p> <p>The chapter on 'Our Vision and Strategic Objectives' need to be strong and future proofed.</p>	

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	<p>The vision statement in para 3.4 is welcome and that West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside.</p> <p>However strategic objectives on Heritage, AONB and Green infrastructure do not spell out a compelling vision for nature. Written strategic objectives on nature are sadly lacking. This means the Council's plan lacks ambition for the future and demonstrates no apparent priority is attached to the natural environment, biodiversity or nature conservation</p> <p>It is remarkable that the clear global concerns on biodiversity, species loss, habitat loss and climate emergency, well-rehearsed in section 5, are so condensed into inanimate, inherited and purely visual aspects of our area. The council should aim do far more to respond to peoples concern that this is not only under threat globally but also imperilled by weakness in their own plans.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 1 – Add in a new standalone strategic objective on Nature for Future Generations</b> <ul style="list-style-type: none"> <li>○ Gives a specific means to deliver the vision of abundant biodiversity across the entire area,</li> <li>○ Holds the council to account for concerns of local people on delivery of Section 5 currently called 'our environment and surroundings',</li> <li>○ To be measured by conservation of existing assets and the creation of new ones.</li> <li>○ Ensure the necessary means to deliver is recognised, delivered upon and funded in appraisals put forward by developers.</li> </ul> </li> </ul> <p><b>Chapter 4 Development strategy – our place based approach</b></p>	

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	<p>The spatial strategy SP1 and SP2 and supporting text are important. SP1 states: 'Thatcham will be a focus for regeneration, for new housing and for improved provision of services and facilities. A new urban extension to the north east of the town will provide a new residential neighbourhood with supporting facilities and green infrastructure (Policy SP17). Opportunities will be taken to maintain and enhance the identity of Thatcham separate to that of Newbury and its surrounding rural settlements'.</p> <p>However the red-lined envelope depicted in the Thatcham growth study fails to address the necessary separation and is in direct contradiction to this strategy. The separation of Newbury and 'surrounding rural settlements' from places identified in the development strategy (e.g. Thatcham regeneration) needs to be strengthened in every aspect of Council thinking and policy.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 2– The LPR must step up and improve its policy, internal and external guidance on separation.</b> The requirement for a strategic gap, to include buffer zones, with recognition of village visions prepared by Parish Councils is essential. It must ensure that sufficient budget is allocated to meaningful strategic separation by developers in their appraisals. Pre-commencement conditions must be set to enforce this.</li> </ul> <p>SP2 states the proposed arrangement if an application is deemed to be major development with proximity to the AONB and aspects that further consideration will take account. However the consultation on the Local Plan Review and a simultaneous consultation of a detailed growth study, which is clearly a major development, is a seriously flawed procedure. This is confusing to local people who want to express their views, gives the clear message that the parameters in the plan are already fixed and therefore one or other consultation has a predetermined outcome. In addition the time table for two such large consultations is unfair.</p>	

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	<ul style="list-style-type: none"> <li>• <b>Recommendation 3 – Complete consultation on the LPR to make the much needed improvements.</b> This should include removal of new allocations on larger sites until after consultation on specific growth studies to ensure the council, residents, developers and other stakeholders have the fairest possible consultation. This must apply to residents impacted by any new proposed SP.</li> </ul> <p>Spatial strategy SP3 and 4 reflect many aspect of national policy. However there is no evidence that the policy alteration associated with exclusions around AWE Burghfield or Aldermaston have been taken into account centrally, thereby updating the national allocations. Residents can rightly expect the Council to have challenged this at the highest level, including by Judicial Review, before producing a plan B such as the Thatcham development. All the materials in the review predate the dramatic alterations associated with online shopping and the COVID-19 pandemic. Therefore it is clear that the housing allocations are flawed in several respects.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 4 – provide clear evidence of UpToDate national comparable figures for developable land.</b> This must demonstrate that reassessment centrally has been undertaken, demonstrate the impact of this and COVID-19 are all accounted for in the Local plan review. Set demanding targets for conversion of brown field commercial property to residential.</li> </ul> <p><b>Chapter 5 Our environment and surroundings – responding to climate change</b></p> <p>There are several important and strategic statements to emphasise here, in particular:</p>	

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	<p>'To improve wildlife habitat and species conservation and connectivity to allow for movement in response to climate change in accordance with policy SP11</p> <p>Ecological distinctiveness – design proposals will create habitats and select species that are locally characteristic, taking opportunities to design wildlife habitats into the fabric of buildings and enhance wildlife connectivity in accordance with policy SP11</p> <p>A landscape does not have to have a designation to be valued locally. Outside the AONB, the River Kennet, from Newbury to Reading, lies within a distinctive broad corridor of an open lowland landscape characterised by a variety of wetland habitats including wet meadow, reed bed, and flooded gravel workings.</p> <p>Contribute to biodiversity net gain and seek opportunities to use green infrastructure to extend wildlife corridors, particularly in urban areas and where it contributes to nature recovery networks.</p> <p>However the absence of the strategic priority reduces their impact and will not ensure their delivery.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 5 – In addition to the new proposed Strategic Objective the Council should deliver its ambition by adding a new Chapter - The Nature Delivery Plan - to the document.</b> This must demonstrate the design, commitment and resources it will allocate to Nature for the future generations. This is what residents of the existing and any new houses will expect.</li> </ul> <p><b>Chapter 6 Delivering housing</b></p>	

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	<p>SP 13 lists the sites for residential and mixed use in Newbury and Thatcham for sites 1 ha or more. Here it adds in NE Thatcham as SP17 for the first time. This draft local plan review and associated report therefore set out a huge increase in development area and house numbers.</p> <p>There is no justification for such an increase in allocation, and in SP17 the proposal of 2500 houses is completely disproportionate for Thatcham and surrounding areas. In the opinion of Bucklebury Parish Council the figures are flawed and therefore withdrawal for a fundamental review and meaningful justification is essential.</p> <p>The impact on the local setting and breach of the Floral Way boundary, objections raised by the North Wessex AONB, are not addressed. No case has been made for ribbon development and the 'Colthrop village' concept is a completely unacceptable joining up of Midgham and Bucklebury Parishes with Thatcham and should be removed from any future considerations.</p> <p>Any housing allocation must demonstrate local benefits to the natural environment.</p> <p>The model for infrastructure provision is dependent on realising house sales, therefore is not 'baked-in' or inevitable. A transparent, enforceable commitment to ensure fair share of profit and investments in local assets is an essential pre-commencement commitment which should be policy for any development.</p> <p>The level of ambition for infrastructure provision and biodiversity gain is insufficient. No budget is allocated to achieving 10% biodiversity gain in the appraisal of viability, the design features do not demonstrate any input from conservation professionals, nationally or locally.</p> <p>Green and biodiverse are not equivalent. The concept, beneficiaries and impact of a new strategic country park are unclear. Any future consideration</p>	



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	<p>of the idea must make clear that is outside the area of allocation and protected in perpetuity.</p> <p>If land at 'Colthrop village' is no longer needed for farming it should be entirely devoted to biodiversity net gain and used to establish a fully functional wildlife corridor between the Kennet valley and Bucklebury heathland.</p> <p>Numerous aspects of the Bucklebury vision have been ignored. It is appears that the views of residents on the edge of the proposed area were either not sought or not taken into account.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 6 – SP13 is unacceptable and needs alteration, particularly removal of the proposed NE Thatcham line item.</b> All the reasons are set out above and in the Bucklebury Parish Council and Thatcham Town Council submissions.</li> </ul> <p><b>SP17 North East Thatcham Strategic site allocation</b></p> <p>SP17 sets out that 'The Council will be supportive of proposals which have regard, and positively respond, to the master-planning work contained in the Thatcham Strategy Growth Study (2020)'. It then lists features the NE Thatcham Strategic allocation may be expected to deliver. However the residents of Bucklebury and Thatcham do not see it that way and their responses should give the Council grave cause for concern. The main objections are listed below:</p> <ul style="list-style-type: none"> <li>• Flawed housing demand analysis</li> </ul> <p>The analysis of housing demand predicating this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking</p>	

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Name supplied (lpr1301)	<p>As family residents of Upper Woolhampton (address below), I wish to register my objection to the proposed full development of the above sites for the following reasons:</p> <ol style="list-style-type: none"> <li>1. We were made aware of this application/ consultation by neighbours in Bucklebury and have not received any information or correspondence from West Berks Council (WBC). WBC are in my opinion negligent in this process. To make it a fair process, the consultation period should be extended and ALL residents should be formally written to, included and invited by WBC to comment.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. The vision and plan uphold Bucklebury as a rural village community, for the village to remain a predominantly rural AONB. That there is no wish amongst residents to allow growth to change the character and nature of our historic, rural community identity. This document is approved and agreed with WBC and should be included as supplementary planning consideration – yet it is not mentioned in the WBC documentation!?</li> <li>3.. In the NWN the following statement is attributed to Hilary Cole. The council's executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), has said: "We are very keen to work with the local community because it's such a big proposal and development for Thatcham." However, WBC have clearly not made good enough attempts to engage with local residents – see above points 1 and 2.</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary</p>

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	<p>4. Loss of village identity. There is simply not enough space between the proposed development and Upper Bucklebury and the boundary of the AONB. The village will practically be part of Thatcham (or the Newbury/Thatcham conurbation) and stands to lose its identity as a village. The proposal would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”.WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <p>5. Unacceptable impact on our AONB. According the gov.uk, an AONB has to a combination of several criteria, two of these are:</p> <ul style="list-style-type: none"> <li>• relative wildness, such as distance from housing or having few roads</li> <li>• relative tranquillity, where natural sounds, such as streams or birdsong are predominant</li> </ul> <p>Both of these points stand to be significantly impacted by such a massive nearby development and may no longer be able to be met.</p> <p>6. Increase in traffic pollution and hazards by Bucklebury Common. We moved next to Bucklebury Common to live in the countryside and be away from car, light and noise pollution. Over the 7 years or so we have lived in Upper Woolhampton, we have already noticed a significant increase in traffic on Carbinswood Lane by Bucklebury Common. The introduction of such a huge development to the area would necessarily increase traffic pollution, cause additional road hazards ( a number of neighbours have sadly lost dogs on the road hit by speeding cars and local wildlife, including snakes,</p>	<p>infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be</p>

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	<p>have been run over) and cause significantly more disturbance to the residents and nature, on what are rural country unmarked roads and lanes.</p> <p>7. Increase in traffic on the route into Thatcham and Newbury and towards the station, which are already heavily congested at busy times. When there are even minor traffic delays/congestion on the main roads, drivers resort to the rural routes which are simply not designed for these increased traffic volumes. An increase in houses in the area stands to significantly increase the traffic volume on our rural roads that are not designed for any increase in traffic volume (nor should they ever be!)</p> <p>8. Increase in traffic and increased potential of speeding through Upper Bucklebury, which is of a major concern due to the primary school and many family residents with children (and pet dogs/ cats). With an increase in traffic, which could be as much as 10%, this will only worsen the situation.</p> <p>9. Impact on Nature. We have seen a number of protected species including the great crested newt, adder, slow worm and bats in and around Bucklebury Common. There are also birds such as the nightjar, which are under conservation concern. We fear increased numbers of cars and people visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this needs to be protected and not put under more threat. The development to the south of Blacklands Copse and Harts Hill Copse will mean open space dramatically reduced and wildlife forced to retreat, adding more pressure on species in decline. Over the last 7 years we have seen a significant increase in the litter in and around the Common and fly tipping in the area. Bringing significantly more people to the area stands to cause more problems like this and more damage to what is already a fragile ecosystem.</p> <p>10. The proposal is an over development of the countryside of rolling hills and farmland and also stands to overdevelop Thatcham. This proposed over development is out of character for the area plans and will have a detrimental impact for the town itself as well as the surrounding villages.</p>	<p>published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The</p>

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	<p>Thattham is at capacity as it. Pre-covid, it was often hard to find a parking space in the town centre, doctors/dentists are apparently stretched, there's limited parking at the train station and already almost full train services at peak times into London. Not to mention the traffic delays around the crossing. There is no evidence that the development will enhance Thattham town centre (or indeed Newbury).</p> <p>11. A previous application was resoundingly rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why, only a few years after this, are WBC now considering this site in light of the previous rejection, what has changed? Knowing a smaller planning application has been refused once and that there is clearly significant local objection again, why have massive funds been spent pursuing it?</p> <p>12. Why have WBC and Thattham council used a great deal of tax payers money in completing many surveys and writing an 800 page report, before going to consultation on the proposal?</p> <p>13. The proposed development will completely surround the Crematorium at Thattham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p> <p>14. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. One pub and shop is hardly justification for a development this size. One thing we love about living in Bucklebury is that there is only one shop and one pub where the community enjoy getting together.</p> <p>15. Bringing more houses and cars to the area will significantly increase the noise and light pollution to a predominantly rural, peaceful area where people live to escape from developments like the the one proposed.</p> <p>16. The HELAA was updated in December 2020 to take account of factual</p>	<p>package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thattham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land</p>



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	<p>inaccuracies. What evidence can WBC produce to prove everything stated in the consultation document is still factually correct?</p> <p>17. Schooling – this will obviously have an impact on local schools (and traffic). Many local families are very concerned that the proposal could overwhelm the brilliant local village schools that currently attract a good number of pupils and maintain a good balance of class sizes. Just because the plans include new schools, it does not mean that new families moving to the area will necessarily choose them. Many may well prefer to try for places at the existing, sought-after, traditional village schools, causing increased class sizes, over-stretching of school resources, increased cars, traffic, people and disruption to small rural villages.</p> <p>18. West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000</a> WBC - Environment Strategy - with declaration of climate emergency. Building 2500 new houses will certainly increase the WBC carbon footprint and goes against the emergency/accelerated goal of carbon neutrality and "protecting and enhancing our natural environment" P5. Increased pollution will certainly be created by the entire construction process, increased light pollution from the development and more cars will bring increased vehicle pollution and noise pollution to our rural area. There are seemingly NO environmental advantages of building a massive development in rural area. A large development can only bring negative environmental impact and therefore goes against the intent, statement and purpose of the WBC environmental strategy.</p> <p>19. The plan suggests the provision of a "country park". There appears to be no budget available for this</p>	<p>to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR</p>

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		<p>will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Liam Lyon (lpr1303)	<b><u>I would like to strongly register my objection to the proposed 2,500 houses in Thatcham:</u></b>	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA

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	<p>1. <b>Traffic Increase.</b> Upper Bucklebury already suffers from speeding traffic as it is seen as an <b>alternative to the A4</b>. Putting <b>traffic lights</b> in will force cars onto the <b>minor roads</b>. Current minor roads are unable to take this <b>extra load</b>. It is already quicker to drive around Thatcham than through it on the A4.</p> <p>2. <b>Development Location.</b> Why build a huge development on the <b>wrong side of Thatcham</b> if most of the traffic needs to travel in the Newbury direction.</p> <p>3. <b>Destruction to AONB.</b> Building so many houses near the woodland will surely cause this area to be destroyed by over use. Already there is pressure on the woodland environment with the current usage by walkers/cyclist/quad-bikers/4*4 vehicles etc.</p> <p>3. <b>Greenbelt.</b> WBC previously approved a Bucklebury Plan that agreed to maintain a strong greenbelt between Thatcham and Upper Bucklebury. The development goes against this completely and would effectively merge Upper Bucklebury with Thatcham.</p> <p>4. <b>Communication.</b> WBC has failed to communicate this proposal to the residents of the local area and have used underhand tactics to try and get this through during lockdown when residents have fewer ways to organise themselves and protest about the changes.</p> <p>5. <b>Pollution.</b> Light pollution, noise pollution and air pollution will all increase.</p> <p>6. <b>Flooding.</b> Building on this site will no doubt present an increase flooding risks due to the hillside nature of this development.</p>	<p>report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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	<p>7. <b>Recreation area.</b> The recreation areas being proposed will only have limited use because it is a hillside development. EG. I can't see children being able to play football too easily on a sloped pitch.</p> <p>8. <b>Healthcare services.</b> There is no provision for the extra demand for GP surgeries.</p> <p>9. <b>Thatcham Station.</b> There is no provision for the extra traffic around Thatcham station (including parking at the station)</p> <p>10. <b>Thatcham Town centre.</b> The plan makes no provision for Thatcham Town centre which is in desperate need for a redevelopment plan.</p> <p>11. <b>Greenfield v Brownfield.</b> Why build on a green field site when other brownfield sites would be more suitable for redevelopment.</p> <p>12. <b>Housing Density/Size.</b> Why does this plan have to have such a huge housing density and size? The argument that 3 schools will be built is just not enough to justify this development in its current plan.</p> <p>13. <b>Harts Hill Road.</b> Harts Hill Road will be unable to cope with this development size. Putting traffic lights in is no solution to the problem. The problem is too many houses with a high density.</p> <p>14. <b>A4 Only Reduced development site considered.</b> The development should be at least scaled down and moved down to the A4 where the impact on the environment will be reduced and traffic problems managed better.</p> <p>15. <b>Pandemic Office Space Changes.</b> As a result of the global pandemic, office space will be in excess supply as people will now be working from home, even after the pandemic is over. This office space could well be converted into housing and needs to be factored in to the housing plan.</p>	<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation</p>

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		<p>18 consultation to strengthen the Council’s policy on pollution.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>

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		<p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states:</p>

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		<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be</p>

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		assessed through subsequent reviews, once such implications are realised.
Geoff and Ruth Mahoney (lpr1302)	<p>We wish to register our objections to the application for house building on the agricultural land between Upper Bucklebury and the A4/Floral Way, Thatcham.</p> <p>It is wrong to build on agricultural land, which once built on can never be used in the future for food production or as amenity. Our children and children's children will be the ones affected most and we should consider our legacy.</p> <p>Its impact on traffic levels, already under great strain, will be unacceptable.</p> <p>Thatcham is already over-developed with no proper infrastructure to support another large development.</p> <p>This area acts as a green belt to Thatcham and is desperately needed to counter air pollution.</p> <p>Please reconsider, and turn down this application.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>



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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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		<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Jermei Shearn (lpr1304)	<p>I want to provide my feedback on the proposed 2500 development in Thattham.</p> <p>The development raises a number of concerns which I want to provide my feedback on:</p> <p>Healthcare - there seems to be no provision of any healthcare. The current facilities are fully stretched today without this huge influx of people.</p> <p>Travel - there will be a significant increase in traffic. The A4 can't deal with the current volume and often tails back whether going towards junction 12 or into Newbury.</p> <p>Level crossing - it can regularly take 20+ minutes to cross the level crossing and traffic backs up massively in all directions. The proposed traffic increase</p>	<p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thattham. It is in close proximity to a range of services and facilities, including the train station. Thattham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thattham requires.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA)</p>

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	<p>of just 5% is simply not realistic as many extra people will be travelling to London.</p> <p>Parking - there is insufficient parking at the station today and this will become a huge problem going forward.</p> <p>Infrastructure services - the current infrastructure struggles to deal with demands e.g problems again this week with water provision to Upper Bucklebury. Broadband is always an issue.</p> <p>Traffic through rural villages - traffic volume will increase through rural villages. Current “calming” measures simply don’t work. What will be done to protect these communities and ensure people’s ongoing safety?</p> <p>Schools - what’s the plan around building additional schooling capacity? All existing schools are over stretched and there’s no clarity on when new schooling capacity will come into effect.</p> <p>Overall, this is a massive impact on a rural environment and I would urge WBC to reconsider the scale and impact of this development as it will have a massive impact on the environment for all.</p>	<p>report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>
Sharon McKellar (lpr1312)	I wish to register my objections to the plan to build 2500 houses which encroaches into Midgham parish. Midgham is a rural area and a designated area of valuable open countryside and I object to any housing estate encroaching onto this land. 2500 dwellings is far too big for this area of West	Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be

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	<p>Berkshire. Indeed it is too big for any area of West Berkshire. It is the size of a small new town. If any new dwellings are to be built they should be spread across the region where facilities already exist.</p>	<p>important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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Joanna Gale (lpr2215)	<p>I would like to express my concerns and objection to 2500 homes on our green spaces in Thatcham.</p> <p>My reason being, what GP surgery would be attached to this estate as they are all full. Do you propose to build a new GP surgery? If so I feel you will have difficulty finding GP's as there is a shortage of these.</p> <p>Are you building a new school as all the local schools are at a maximum?</p> <p>How is the infrastructure going to work when we are already sitting at Thatcham level crossing for at least 20 minutes. With all these new houses and minimum 2 cars per house you could be increasing our traffic IRO 5000 cars! Can you imagine, the queue to the station could back right to the A4 where I presume is going to be your main entrance to this estate?</p> <p>Getting into Newbury by car now takes so long due to the amount of traffic in Thatcham now.</p> <p>So you will have to offer social housing.</p> <p>I enjoy my dog walks and runs in the green space you will take, this is also one of my reasons.</p> <p>Thatcham will just look like a huge building estate.</p> <p>I would appreciate my comments being added to your long list of objections please.</p> <p><i>(some personal comments removed)</i></p>	<p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant</p>

Respondent (with lpr ref)	Response	Council Response
		<p>impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include</p>

Respondent (with lpr ref)	Response	Council Response
		a new community park linking Thatcham to the AONB. This will be accessible to all.
Nicola Edge (lpr1313)	I object to the council's proposal of building 2500 new houses on green fields from Lawrence's Lane down to Floral Way on Dunston Park, because of the traffic backing up from the railway station and congestion on the A4 and surrounding roads, no additional GP surgery or dentist which would be needed for this additional housing, lack of school places, flooding risk, loss of wildlife, pollution and over crowding.	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has</p>

Respondent (with lpr ref)	Response	Council Response
		<p>taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality.</p>



Respondent (with lpr ref)	Response	Council Response
		<p>These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Pauline Monk (lpr1314)	<p>I <b>object</b> to the above development for the following reasons:</p> <ul style="list-style-type: none"> <li>• <b>Overdevelopment</b> - 2,500 houses, potentially 7,5000-10,000 people i.e around one third of the current Thatcham population.</li> </ul> <p>ONS states a small town equates to 5,000 – 20,000 people</p> <p><b>This development equates to a new small town.</b></p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>2011 census: Thatcham = 25,878 population</b></p> <p><b>Hungerford = 5,767 population.</b></p> <p>Hungerford's infrastructure has developed over the years to meet the needs of the community.</p> <ul style="list-style-type: none"> <li>• <b>Lack of infrastructure provision for this development other than three new schools.</b> There is very little space for the necessary infrastructure to support a new small town.</li> </ul> <p>∅ Parking at Thatcham station is inadequate at present.</p> <p>∅ The level crossing at the station will become even more of a problem. Long delays and tail backs form back towards the A4 - more likely to impact on the A4</p> <ul style="list-style-type: none"> <li>• <b>Traffic Increase</b> to rural communities north of Thatcham</li> </ul> <p>∅ Potential for up to 5,000 more vehicles. There is already a large volume of traffic through Upper Bucklebury, both from and to Thatcham.</p> <p>∅ Potential for an increase in speed issues and an inevitable increase of volume of traffic on unclassified roads through Upper Bucklebury and to the surrounding rural villages.</p> <ul style="list-style-type: none"> <li>• <b>Rurality</b></li> </ul> <p>∅ North Wessex Downs AONB. This area of natural bio-diversity will be at risk. Development is too close to the boundary of the AONB with the potential to permanently endanger or destroy the existing natural flora and fauna of the AONB.</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The</p>

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	<p>Ø Potential for noise pollution</p> <p>Ø Potential for light pollution</p> <p>Ø Endangered species and habitats exist on the common</p> <p>Ø Bucklebury Common – an area of 1000 acres of important ancient heathland.</p> <p>Ø Bucklebury Common - an area of significant Historical Interest</p> <p>I further object most strongly for the following reason:</p> <p><b>Covid19</b></p> <p>To continue to progress with this proposed development without consideration of the impact of Covid19 on our country in general, and on our local area in particular, I consider to be wholly irresponsible. None of us knows what our future needs are going to look like after the devastation caused to the country's economy, to people's finances, to population growth etc. It certainly will not be the same as when these plans were drawn up. The needs of the population for the next fifteen years or so cannot possibly be decided upon based on pre-Covid assessments.</p> <p>There needs to be a time of reflection and re-evaluation of the needs of our society and to look again at the future use and possible re-purpose of assets already available in this area. I believe that will be the only responsible way forward.</p> <p>There needs to be a time of reflection and re-evaluation of the needs of our society and to look again at the future use and possible re-purpose of assets already available in this area. I believe that will be the only responsible way forward.</p>	<p>package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>parameters of the site, height parameters, green open space, etc.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that “We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government’s aspirations to have plans in place across the country by 2023.”</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the</p>

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		Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.
Elizabeth Collacott (lpr1315)	I am writing to voice my objection to the proposed development of green space from Lawrence's Lane along Floral Way in Thatcham. I am told the plan is to build 2500 new homes there. This is a terrible idea for our area as we keep losing so much green space. We need areas to take walks with our dog and our family which don't require getting in the car. These developments affect pollution, wildlife, school places, overcrowding of our roads and the lack of infrastructure in place locally to support such a development. Mainly, though, we don't want our environment so built up. We need to protect our green space. Therefore we ask that you listen to the people that live in this area. We don't want this development. You are ruining our home.	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation</p>

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		<p>18 consultation to strengthen the Council’s policy on pollution.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Andrea Varney (lpr1317)	<p>I would like to formally register my objection to the proposed development of 2500 houses at NE Thatcham for the following reasons:</p> <ol style="list-style-type: none"> <li>1. It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury.</li> <li>2. The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham.</li> <li>3. It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If</li> </ol>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for</p>

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	<p>developments of this scale are approved there will not be any open rural areas left for future generations to enjoy.</p> <ol style="list-style-type: none"> <li>4. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain area.</li> <li>5. The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and ill-conceived.</li> <li>6. This development will have a significant impact on traffic levels and the associated pollution throughout the area, especially increasing: <ol style="list-style-type: none"> <li>1. Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially as we have children who walk along this road to the Primary School.</li> <li>2. Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.</li> <li>3. Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested at busy times and in the event of any minor traffic disruption.</li> </ol> </li> <li>7. It will significantly increase the noise and light pollution to the Bucklebury residents. There are no street lights in Upper Bucklebury.</li> <li>8. There is no evidence that this development will enhance Thatcham town centre (or the area in general).</li> <li>9. It is not likely to attract new businesses to the area or create or significantly increase employment.</li> <li>10. The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development includes retail.</li> <li>11. This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services</li> </ol>	<p>additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning</p>



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	<p>which are already overstretched.</p> <p>12. It will be another area of the environment that is destroyed with an immediate detrimental impact on protected wildlife and the destruction of natural vegetation.</p> <p><b>To conclude this development is unnecessary, inappropriate and ill-conceived and should be rejected.</b></p> <p><b>Observations</b></p> <ol style="list-style-type: none"> <li>1. Awareness of this development/application/consultation was provided by the local community and not WBC. Furthermore, it is not clear at what stage this application has now reached.</li> <li>2. Why is WBC not writing to all residents to make them aware of this development and encourage/seek comments on the proposal from as wider audience as possible?</li> <li>3. Taking into consideration the scale of this development there has been a distinct absence of communication which is extremely disappointing.</li> <li>4. As a local resident I find the comment by Councillor Hilary Cole reported in the Newbury Weekly News that <i>“We are very keen to work with the local community...”</i> a pleasant surprise and I would be interested to know when it is going to commence.</li> <li>4. Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and Upper Bucklebury. The consideration of this approval now certainly seems to totally contradict this stated commitment.</li> </ol>	<p>application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental</p>

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	<p>5. Finally, why is WBC are now considering this development when a previous application was rejected by the secretary of state in 2017?</p>	<p>nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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		<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The Local Plan Review Regulation 18 consultation is one of the consultation stages in the preparation of the Local Plan. Following the consultation all representations will be considered and responded to prior to another round of consultation. The document will then be submitted to the Secretary of State and will be considered by an Inspector known as an Examination in Public. If the Inspector finds that the document is sound, the Local Plan Review can be adopted by the Council.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be</p>

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		<p>appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>
Dave Smith (lpr1316)	<p>I want to register my strong objection to the planning for north Thatcham on the grounds that there is insufficient infrastructure existing, or planned, to overcome it.</p> <p>Principally I see the main issue that the railway crossing situation has not been solved, and until such time as a pragmatic, and approved (!) solution is made for this I will strongly object to any further development. It should have been solved during the last 15yrs since Kennet Heath came into being.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at</p>

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		<p>junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
James Fielding (lpr1327)	<p>I would like to formally register my objection to the proposed development of 2500 houses at NE Thatcham for the following reasons:</p> <ol style="list-style-type: none"> <li>1. It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If developments of this scale are approved there will not be any open rural areas left for future generations to enjoy.</li> <li>2. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain area.</li> <li>3. It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury.</li> <li>4. The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham</li> </ol>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council,</p>

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	<p>5. The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and ill-conceived.</p> <p>6. This development will have a significant impact on traffic levels and the associated pollution throughout the area, especially increasing:</p> <p>7. Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially as we have children who walk along this road to the Primary School.</p> <p>8. Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.</p> <p>9. Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <p>10. It will significantly increase the noise and light pollution to the Bucklebury residents. There are no street lights in Upper Bucklebury.</p> <p>11. There is no evidence that this development will enhance Thatcham town centre (or the area in general).</p> <p>12. It is not likely to attract new businesses to the area or create or significantly increase employment.</p> <p>13. The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development includes retail.</p> <p>14. This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are already overstretched.</p> <p>15. It will be another area of the environment that is destroyed with an immediate detrimental impact on protected wildlife and the destruction of natural vegetation.</p> <p><b>To conclude this development is unnecessary, inappropriate and ill-conceived and should be rejected.</b></p> <p><b>Observations</b></p>	<p>mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's</p>

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	<ol style="list-style-type: none"> <li>1. Why is WBC not writing to all residents to make them aware of this development and encourage/seek comments on the proposal from as wider audience as possible?</li> <li>2. Taking into consideration the scale of this development there has been a distinct absence of communication which is extremely disappointing.</li> <li>3. As a local resident I find the comment by Councillor Hilary Cole reported in the Newbury Weekly News that <i>"We are very keen to work with the local community..."</i> a pleasant surprise and I would be interested to know when it is going to commence.</li> <li>4. Awareness of this development/application/consultation was provided by the local community and not WBC. Furthermore, it is not clear at what stage this application has now reached.</li> <li>5. Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and Upper Bucklebury. The consideration of this approval now certainly seems to totally contradict this stated commitment.</li> <li>6. Finally, why is WBC are now considering this development when a previous application was rejected by the secretary of state in 2017?</li> </ol>	<p>flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These</p>

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		<p>policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>



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		<p>strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The Local Plan Review Regulation 18 consultation is one of the consultation stages in the preparation of the Local Plan. Following the consultation all representations will be considered and responded to prior to another round of consultation. The document will then be submitted to the Secretary of State and will be considered by an Inspector known as an Examination in Public. If the Inspector finds that the document is sound, the Local Plan Review can be adopted by the Council.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core</p>

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		<p>Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>
Stephen Paice (lpr1328)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons. These reasons will be similar to other objections, but I agree with every one of them.</p> <ol style="list-style-type: none"> <li>1. The Vast majority of Upper Bucklebury residents are against this development, many have already registered their objections, however many are not aware of the application or consultation as no information has been sent out by WBC. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the</p>

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	<p>3. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating <b>“particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”</b>.</p> <p>WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <p>4. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far ?</p> <p>5. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</p> <p>6. In the NWN the following statement is attributed to Hilary Cole.</p> <p>The council’s executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), said: <i>“We are very keen to work with the local community because it’s such a big proposal and development for Thatcham. “We have taken a conscious decision to do this around Thatcham so it will deliver the infrastructure we need. “We feel that Thatcham is best placed to take a development of this size.”</i></p>	<p>continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’</p>

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	<p>I have two specific issues to object to on these statements made. Firstly WBC have done very little if any to work with local residents – see above points and secondly Ms Cole’s statement infers that the decision is made, so why is so called consultation being held ?. Because of this she should resign.</p> <ol style="list-style-type: none"> <li>7. WBC and Thatcham councils have wasted a great deal of tax payers money in completing many surveys and writing an 800 page report, effectively making this a fait accompli, before going to consultation on the proposal.</li> <li>8. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</li> <li>9. This will significantly impact the freight traffic using the industry site at Thatcham</li> <li>10. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</li> <li>11. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</li> <li>12. It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</li> <li>13. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this size. The shop is also likely to suffer as the plan indicate that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</li> <li>14. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is</li> </ol>	<p>in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA</p>

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	<p>extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</p> <p>15. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</p> <p>16. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>17. The HELAA was updated in December 2020 to take account of factual inaccuracies – who is to say that the same people who have made the assessment of this site don't have their facts right in this document or this time. What evidence can WBC produce to conclude everything stated is factually correct.</p> <p>18. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. When would this be built before or after the houses ? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p> <p>Please refuse permission for this development. It would, in effect, add the equivalent of Hungerford onto the edge of Thatcham, but without any infrastructure to support it.</p>	<p>report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These</p>

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		<p>policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
James McDonald (lpr1331)	<p>I write to set out my strong objection to the proposed development of up to 2,500 houses at North Thatcham. My objection, explained further below, is based upon:</p> <ul style="list-style-type: none"> <li>• The unacceptable damage to wildlife and fragile habitats in the surrounding area, and the plan demonstrates a lack of regard for responsible actions during the climate crisis</li> <li>• The unmitigated risk of damage and destruction to the Area of Outstanding Natural Beauty</li> <li>• The lack of adequate infrastructure to support development of this massive scale</li> <li>• The inevitable loss of community environments and identities should this development be tragically allowed to proceed</li> </ul> <p><b>Damage to wildlife and fragile habitats</b> The scale of development set out in the plan would cause catastrophic damage to local wildlife and fragile habitats. West Berkshire Council has a duty of care to support and enhance the local natural environment, and it would be negligent for the Council to consider pursuing this development on the basis of the damage it would cause to local ecosystems.</p> <p>The scale of the proposed development, up to 2,500 houses, would deliver a material increase in air pollution. Whilst the plan notes that environmentally friendly energy options will be favoured, it offers no commitments to implementing these measures, or any reliable analysis of the impact on air</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>quality. The risk of a substantial degradation of air quality is inadequately evaluated and wholly unmitigated in the plan.</p> <p>In addition, this number of new homes would deliver a material increase in light pollution. The local area is known for its dark nights, and is home to a variety of nocturnal species including bats and owls. This scale of light pollution would cause distress, displacement and death to such creatures, at a time when their natural habitats are being destroyed across the country and many of them are becoming endangered as they battle with the effects of human pollution and destruction on a massive scale. Again, this risk is inadequately evaluated and wholly unmitigated in the plan.</p> <p>Further, the development would require the clearing of greenery, removal of hedgerows and deforestation of large open spaces. At a time when the climate crisis impact is clearly visible, with disrupted weather patterns and increased flooding as local evidence of this impact, for the Council to consider destroying valuable natural environments that can help to reduce carbon dioxide levels and offset part of our impact on the environment is unacceptable. The suggestion of a “country park” set out in the plan is completely inadequate and demonstrates a total lack of regard for the impact we have on our planet.</p> <p>The horrific consequences on local wildlife and habitats should be sufficient evidence alone for the Council to abandon this proposal.</p> <p><b>Damage and destruction to the Area of Outstanding Natural Beauty (AONB)</b></p> <p>In addition to the pollution and destruction of habitats noted above, an increase in the local population of this scale, and associated increase in visitors, will do further damage to the AONB.</p> <p>In Upper Bucklebury, and surrounding areas, the impact of visitors is clearly evident in the local environment. Walkers, cyclists and illegal off-roading vehicles put the local area under significant pressure, and a material increase in the local population would be to the further detriment of the</p>	<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>AONB. The Council has a responsibility to “conserve and enhance” the AONB. A development of this scale, on the edge of the AONB, when the area’s wildlife and environment is already under visibly evident pressure, would contribute to further damage and destruction of the AONB. Further consideration of this development would therefore be a failure of the Council to fulfil that responsibility.</p> <p><b>Lack of adequate infrastructure</b> Thatcham and its surrounding villages are reliant on limited infrastructure that has not kept pace with recent developments, and cannot bear the pressures of a significant population increase. The A4 is a small and limited-capacity route used by a significant number of vehicles, and this regularly results in significant delays. Alternative routes, such as Harts Hill Road into Upper Bucklebury, is a narrow road with no pavement for pedestrians, that would inevitable see significantly more traffic as a cut through to get to Reading and other centres of employment. This would cause destruction of the local environment as outlined above, and be dangerous to the inhabitants, particularly children, of these surrounding villages. The increased level of traffic through surrounding villages would be to the significant detriment of the residents of those villages, and this impact has not been adequately considered in the plan.</p> <p>Public transport in the area is limited. A significant proportion of the inhabitants of the proposed development would need to travel for employment in Newbury, Reading, London and other nearby employment centres. The lack of public transport would therefore generate further road traffic, and increase the pressure on existing public transport. The railway station is limited in scale and capacity, with little parking that is essential for residents of the surrounding villages who have no alternative method to get to the train station.</p> <p>The plan demonstrates a lack of vision or appreciation for the transport requirements to support such a development, and the impact of increased traffic on the surrounding villages is unacceptable.</p>	<p>LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR),</p>

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	<p><b>Loss of community environments and identities</b> Each of the villages in the area, Upper Bucklebury included, has a strong community environment and distinct identity. West Berkshire Council have previously committed to maintaining these identities through planning policies to ensure distinct boundaries are retained. The scale of the proposed development between Thatcham and Upper Bucklebury does not maintain this boundary, and the proposed development disregards the firm commitments previously made by the Council.</p> <p>In order to retain the trust of local residents, the Council needs to honour the commitments it has made previously to safeguarding the identities of local villages. In order to do this, the Council needs to identify alternative development sites away from this area, and abandon the proposal for North Thatcham.</p> <p>I therefore urge West Berkshire Council to terminate any plans to develop the sites to the north of Thatcham, seek alternative sites away from this area and the AONB for any future developments, and make a public commitment to end any further development in this area.</p> <p>Terminate any plans to develop the sites to the north of Thatcham, seek alternative sites away from this area and the AONB for any future developments, and make a public commitment to end any further development in this area.</p>	<p>which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Jonathan Alderman (lpr551)	<p>I only support SP17's policy inclusion of the following item: "On-site renewable energy to assist in the delivery of a carbon neutral development" IF the chosen technology is capable of demonstrating its Green credentials.</p> <p>I do not support CHP plants burning plastic or waste wood, i.e. high CO2 emission fuel, as their feedstock.</p> <p>These types of electricity generation plants also rely on their feedstock being delivered by HGV, which could be as many as 20 HGVs daily, every day of the year during the lifetime of the plant. These HGVs are also a source of</p>	<p>Considered and noted, the emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>polluting emissions, which will impact on Air Quality and the health of local residents.</p> <p>The change I am seeking is that any On-site renewable energy plant must demonstrate its Green credentials, e.g. the deployment of Carbon Capture and Storage technology and be fuelled by low CO2 emitting fuel (LPG, Natural Gas or Hydrogen).</p>	<p>development to the most sustainable locations in the district.</p> <ul style="list-style-type: none"> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>
David and Sarah Farlow (lpr1332)	<p>I would like to express my objection to the building of the above mentioned houses. I have lived on &lt;personal information removed&gt; in Thatcham for 20 years. The reason we moved to this part of Thatcham was because we liked living in a town but on the edge of some beautiful countryside. We frequently go for walks in the countryside up Lawrence's lane and the surrounding area across to harts hill rd. I cannot imagine the impact of 2500 more houses in the area. I believe dunstan park has 800 houses and having another 2500 houses built on the countryside would be devastating.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>

Respondent (with lpr ref)	Response	Council Response
Graham Storey (lpr579)	<p>The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties, never mind additional ones.</p> <p>The Colthrop industrial estate should become a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for affordable and social housing.</p>	<p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p>

Respondent (with lpr ref)	Response	Council Response
Ian Halliday (lpr624)	<p><b>SP17 NE Thatcham.</b> The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties and will not be able to cope with additional ones.</p> <p>Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</p>	<p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p>
Jane Halliday (lpr625)	<p><b>SP17 NE Thatcham.</b> The proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the</p>	<p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development</p>

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	<p>existing number of properties and will not be able to cope with additional ones.</p> <p>Pursuing a redevelopment of the Colthrop industrial estate into a mixed housing/employment district similar to the LRIE proposals but with a higher weighting for housing. This district would benefit from being within walking distance of Thatcham station giving easy public transport links to Newbury and Reading/London.</p>	<p>proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p>
Councillor Owen Jeffery (lpr1335)	<p>The proposal to site 2,500 homes in North East Thatcham is a Planning travesty.</p> <ul style="list-style-type: none"> <li>• The site dominates the view from Thatcham to the North and East.</li> </ul>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so</p>

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	<ul style="list-style-type: none"> <li>• It is to be located on land that in 2007 was the source &amp; route for catastrophic flooding of the old Sony site (by then SSE) which by repute totalled c £6M of damage. The green sward of these fields is essential to absorbing water and holding water to avoid similar deluges across the A4 to the south in future.</li> <li>• As a strategic plan it is a failure. Thought has only been given to civic services that ‘wash their face’ by the limited standards of a conventional plan – not the needs of a proposed Thatcham New Town. There is no strategic thought embedded in the document at all.</li> <li>• As above no consideration has been given even to a land swap to allow for a purpose designed, purpose built education campus with Kennet and Francis Baily Schools relocated to a limited part of the site; and land so freed up being traded for housing in the genuinely sustainable location where walk to Station and walk to Village centre are actually possible.</li> <li>• The size and extent of the proposed New Town will bring virtual coalescence of Thatcham with Bucklebury (and possibly Cold Ash).</li> <li>• Assertions that the working population of this New Town will walk or cycle to the Railway Station are an affront to common sense. There is no possible location for adequate parking on either or both sides of the railway line.</li> <li>• Statements that there is now and will not be traffic hold ups on the A4 / Northern Distributor Road are incorrect. Hold ups and pinch points already exist and 2,500 homes occupied will massively worsen traffic loadings and delays on all Thatcham-Newbury routes (Official and unofficial desire routes).</li> <li>• That Thatcham has not been targeted with additional civic and commercial amenities in the last 20 years or more is correct; the suggestion that these can be substantially improved is wholly illusory as McCarthy &amp; Stone were permitted to develop their new Retirement Home complex on every piece of available Town Centre land to the east of The Broadway. There is no central Thatcham site</li> </ul>	<p>whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities</p>




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	<p>left that could be developed for extra civic amenities nor additional commercial &amp; retail shops.</p> <p>The proposed strategic plan to 2036 for Thatcham cannot be delivered by its own terms: it can only be delivered if the needs of Thatcham are disregarded / ignored in order to permit a New Town to be built without adequate facilities, rail access, road infrastructure, education establishments of appropriate standard nor even safety from a future catastrophic flood such as that which we suffered in 2007.</p>	<p>and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel</p>

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		<p>and lifestyle choices will be important elements of the overall transport plan.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of</p>

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		<p>enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The proposed allocation of sites takes account of the evidence from the HELAA and Sustainability Appraisal (SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy. Thatcham lies in the top tier of the settlement hierarchy (it is an Urban Area). Urban Areas will be the prime focus for housing and economic development.</p> <p>The proposed strategic allocation of North East Thatcham is in accordance with the spatial strategy set out in the LPR.</p>
<p>Katie Montague-Johnstone (lpr1337)</p>	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons.</p> <ol style="list-style-type: none"> <li>1. The vast majority of Upper Bucklebury residents are against this development, many have already registered their objections, however many are not aware of the application or consultation as no</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

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	<p>information has been sent out by WBC. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</p> <ol style="list-style-type: none"> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> <li>3. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”. WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</li> <li>4. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far ?</li> <li>5. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland.</li> <li>6. WBC and Thatcham councils have wasted a great deal of tax payers money in completing many surveys and writing an 800 page report, effectively making this a fait accompli, before going to consultation on the proposal. Have the opinions of the residents in Upper Bucklebury been considered sufficiently ?</li> <li>7. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event</li> </ol>	<p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control.</p>

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	<p>of any minor traffic disruption.</p> <p>a. This will significantly impact the freight traffic using the industry site at Thatcham</p> <p>b. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</p> <p>Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</p> <p>8. It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p> <p>9. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this size. The shop is also likely to suffer as the plan indicate that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</p> <p>10. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</p> <p>11. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</p> <p>12. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area and population growing.</p>	<p>The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan'</p>

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	<p>13. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. When would this be built before or after the houses ? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p> <p>14. West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000</a>WBC - Environment Strategy - with declaration of climate emergency. This will not be helped with the increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and so on, causing a decrease in air quality.</p> <p>15. The plan suggest the provision of a “country park”. There is no budget available for this.</p> <p> Additional Comments :</p> <p><b>Traffic</b> We fear with any increase in traffic the village will become unbearable and dangerous. It worries me that it won't be long until a dreadful accident happens. This development would result in a huge increase of traffic movements per day, not only on the A4 but also on narrow, rural lanes which already experience a relatively large number of vehicle usage. With more traffic on the A4, the speed of vehicles will decrease and the risk of delay increase. Many cars will use a diversion .. turning to driving through Upper Bucklebury, along the Common and through the villages of Chapel Row and Bradfield Southend thus making these rural roads a ‘rat-run’. Already cars</p>	<p>/ visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in</p>

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	<p>using this route do not stick to speed restrictions and drive at vastly excessive speeds along the Common. I believe this will cause an increase in accidents.</p> <p><b>Nature</b> There are a number of protected species including the great crested newt, common lizard, adder, grass snake, slow worm and bats. There are also birds such as owls, nightjars (we believe last summer was in the burdens heath plantation area as well as on the common) which are under conservation concern. We fear increased amounts cars and people visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this need to be protected and not put under a greater threat. The development to the south of Blacklands Copse and Harts Hill Copse will mean open space dramatically reduced and wildlife forced to retreat, pushing species into decline.</p> <p>There is already too much litter and fly tipping in the area, as well as car parks being used after dark for illegal drug use. This will only increase and damage the fragile ecosystem which is already at breaking point with the extreme overuse of the common by 4x4 vehicles, motorbikes, bicycles and the huge increase of walkers ... resulting in the extreme degradation of many of the byways and footpaths throughout the parish.</p> <p><b>Light pollution</b></p> <p>There are no street lights in the villages and the residents will find the encroachment of the light pollution from such a development will have a substantial detrimental effect on the darkness of the sky at night.</p> <p><b>Noise pollution</b></p> <p>The increase in traffic and road use will result in an increase in background noise, damaging the rural environment and the peace of the countryside.</p> <p><b>Identity</b></p>	<p>to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs</li> </ul>

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	<p>There is simply not enough space between the proposed development and Upper Bucklebury and the boundary of the AONB. The village will practically be part of Thatcham (or the Newbury/Thatcham conurbation), it will lose its identity as a village. /</p> <p>According the <a href="http://gov.uk">gov.uk</a>, an AONB has to a combination of several criteria, two of these are:</p> <ul style="list-style-type: none"> <li>· relative wildness, such as distance from housing or having few roads</li> <li>· relative tranquillity, where natural sounds, such as streams or birdsong are predominant</li> </ul> <p>Both of these will be impacted heavily by the development and could not be met. We would imagine the boundary of the AONB would have not been where it currently is should this development already have been in existence.</p> <p>The proposal is an overdevelopment of Thatcham, is out of character and will have a detrimental impact for the surrounding villages as well as the town itself. Thatcham struggles as it is. There is insufficient parking in the town, doctors stretched, limited parking at the train station and already almost full train services at peak times into London. Not to mention the traffic delays around the crossing. Flooding remains a risk and this will become more so if this goes ahead. There are not enough opportunities for entertainment for young people which could result in an increase of anti social behaviour.</p> <p>Thatcham has already had numerous and relatively large developments over the last twenty years and it has changed the town from a small, market town with a distinct identity to a bigger, widespread town with a less obvious identity. Any further enlargement will cause a detrimental effect not only on Thatcham itself but upon the neighbouring rural areas and villages. It is important to protect our countryside and maintain development to brown field sites and infill development. Please do not vote for this development - it is totally out of scale to the area that has been suggested and seriously encroaches on a precious AONB.</p>	<p>development to the most sustainable locations in the district.</p> <ul style="list-style-type: none"> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p>



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		<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Emma Day (lpr1339)	<p>We write to you to implore that you do not eradicate the beautiful countryside that lays between Lawrence Lane and Floral Way in Thatcham. This is a very valued area for local residents like ourselves who enjoy the pleasure of walking with our families and the beauty of nature and all that it encompasses. It has an abundance of wildlife that without this natural habitat will disappear. It has never been clearer than in present times with climate change as it stands, the importance of preserving green space areas like this with its ability to preserve safe haven for many species of animal and insects alike. During our lockdowns over the last year our family, like numerous other, have spent plentiful hours enjoying and appreciating the areas in our neighbourhood and this area in particular has now become an area of leisure for so many in Thatcham.</p> <p>The impact on us locally as residents highlights many other areas of concern. As residents of Northfield Road we already realise the vast volumes of traffic that already use this route as we use it daily ourselves for school runs. It is used by so many to avoid having to travel through Newbury on the main roads and also on occasion as a diversion from the A4 or traffic</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure</p>

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	<p>diverted from the M4. It begs the question how it will cope with an increase of 2500 new home and the families it will house? The massive increase in air pollution, another area that is also contributing highly to global warming and the affect it can have on the health of the existing residents!</p> <p>As a Mother I worry for our children who we already have to fight for school placements. It is apparent that already local authority does not have provision for another influx of 2500 homes and their families. We are lacking in so many facilities, doctors already under huge pressure in this area, dentists, and of course currently the massive increase in unemployment. An ambulance service already under unimaginable pressure even before Covid-19. We have a hospital, but it doesn't even have a 24 hr A&amp;E or maternity unit let alone provision for cancer patients. A very underutilised crucial facility. We have one secondary school in Thatcham. I ask the question what provision will you be putting in place to facilitate access to these areas in Thatcham for an yet another increase in population?</p> <p>It is without any doubt in our minds that failure to preserve this area with all it has to offer would be more than devastating and have a huge impact on the health and welfare of all currently residing in Thatcham.</p> <p>Yours with great sadness and hope of preservation</p>	<p>which will include a new community park linking Thatcham to the AONB.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Lee Beeson (lpr1338)	<p>I would like to register my objection to the WBC Emerging Plan for the development of 2500 homes NE of Thatcham I would also like to be kept informed with further information on this emerging local plan.</p> <p><b>Scale and Location</b> The scale of this particular proposal is quite out of proportion for the area, being as it is, ten times the size of Upper Bucklebury and 25% the size of Thatcham. Indeed it is a town the size of Hungerford without the supporting shops, doctors or infrastructure.</p> <p>This proposal removes the long established settlement boundary of Thatcham to suit this proposal, a boundary that has always been sacrosanct. Protection of this Boundary is also stated as being essential in the draft plan highlighting the inconsistencies in the documentation.</p> <p>WBC have previously stated that the future of Thatcham should focus should be on enhancing the viability of Thatcham, not increasing its footprint. There is no evidence this would support any of the Thatcham town facilities. WB Landowners have put up land that would provide for 20,000 homes. There are alternatives stated in the document with some very weak arguments as to why they are not suitable.</p> <p>There is considerable likelihood that much more office space will be converted under permitted rights to living accommodation. This incremental</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a</p>

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	<p>housing opportunity (including perhaps retail shops such as Debenhams) is not factored into the housing needs part of the document.</p> <p>West Berkshire declared a climate emergency on 2 July 2019. This plan is in direct contradiction to WBC own stated intentions. This development will result in increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and so on. Paving over countryside can only be detrimental to the environment and result in a loss of our nature and biodiversity.</p> <p>The plan makes no note of the CLH pipeline which is part of the national network carrying aviation fuel around the country and obviously runs exactly where the schools are shown on the plan – building a school over this is ludicrous. [SEE MAP IN ATTACHED LETTER]</p> <p>Bucklebury was one of the first villages in the Country to create a village plan which has been adopted by WBC and is regularly updated. There is no mention or consideration of this in the draft plan.</p> <p><b>Environment</b></p> <p>The site lies outside the settlement of Thatcham, as defined in the Local Plan, with the settlement boundary running around the southern and western edges of the land. The North Wessex Downs AONB is approximately 450m north of the site. This is not noted in the plan. With respect to agricultural land, 77.6% of the site is of the Best and Most Versatile (BMV).</p> <p>The site is a haven for wildlife including owls and other protected animals. The proposal includes the destruction of ancient Woodland, which WBC have a Policy and obligation to protect.</p> <p>Flooding is a major risk from excess water runoff and the area to the South of the proposed site is already subject to flooding. The document is inadequate in how this will be addressed.</p>	<p>'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes</p>

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	<p>Due to the nature of the surrounding geology it has been suggested that it could lower the water table for the properties above and lead to subsidence.</p> <p><b>Infrastructure</b> Traffic is major concern not accurately considered in the plan. The traffic measurements shown the document inaccurate as they do not consider the substantial traffic flow that will go via Cod Ash, Ashmore Green and Hermitage to access the M4/A34 north etc.</p> <p>Cold Ash is already congested and plagued by speeding cars. Upper Bucklebury, Southend Bradfield and the other villages will all become larger rat runs than they already are. Many of the small interconnecting roads (Cox's Lane etc) are single track and unsuitable for a development this size. Then of course the issue of Thatcham railway crossing and delays there along with the lack of parking at the station especially for potentially hundreds more commuters.</p> <p>The A4 is already congested during rush hours, adding 5000 more cars many of which doing school runs will bring the traffic from the industrial estates and villages into and out of Thatcham/Newbury to a stand still. There is no mention of Doctors or Dentists or other healthcare facilities which are already under strain in the area.</p> <p>One of the reasons Siege Cross was rejected was the lack of services including Water (fire fighting), waste treatment and so on.</p> <p><b>Communications and objections</b> The publication of the emerging plan and how the community were made aware of the plan has been quite abysmal. The fact that it is published for locals to prepare a response over Christmas and new year is simply suspicious and unacceptable. WBC should learn from this and write to every resident within WBC.</p> <p>I should bring the Councils attention that many members of the public, and indeed those same people who vote for councillors, are up in arms about</p>	<p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has</p>

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	<p>this. There are nearly 2500 objections on the change.org petition <a href="http://chnng.it/HYTHv57fqs">http://chnng.it/HYTHv57fqs</a> which need to be given due consideration by WBC.</p> <p>There are numerous Facebook pages dedicated to the opposition of this including this one with over 200 members <a href="#">Bucklebury Parish against Thatcham Development   Facebook</a>.</p> <p>It is abundantly clear that this matter is being driven along party political lines, with the Conservative members clearly being told to “toe the line”. This is not, and should not, come down to party politics, the nature of WBC or the large percentage of AONB.</p> <p>Thatcham Town Council, Bucklebury Parish Council and I am sure many other organisations are all opposed to this development.</p> <p><b>Schooling and housing</b></p> <p>The proposal and need for additional schooling is driven by the incremental housing stock and will not support the remainder of Thatcham. Indeed, it is likely to be highly detrimental. If the schools are built after the new houses, then until that time the kids will have to go to local schools and moving them subsequently would be very disruptive. However, if you build and open the schools early and as we have seen at Newbury (Highwood Copse) they then try to poach pupils from surrounding schools to justify their existence and impact the viability of those pre-existing schools. The promise of new schools to benefit the community is therefore flawed.</p> <p>In the report a lot is made of social housing. Social housing a misnomer as the major beneficiaries are the housing associations and developers. Much was made of the social housing aspects of the Newbury College location where the average house price is close to £500k. Hardly affordable. Upper Bucklebury is “light free”, we have no streetlights and the light pollution from this cause a consideration amount of light pollution.</p> <p>We would be subjected to noise pollution from the massive building site every day for years.</p>	<p>undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Topics not addressed and further questions:</b></p> <ol style="list-style-type: none"> <li>1. Considering that WBC has housing stock for the next 7 years, a question arises as to what is the apparent urgency on completing this?</li> <li>2. I read in the press the driver for this is that WBC have pulled out of the Grazeley new “market town”, but Reading and Wokingham are still persisting with this. It is unclear why WBC are not persisting with this, recouping the investment already made and making use of the pro-offered Government funding</li> </ol>	<p>strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys</p>

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		<p>from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The consultation was run in accordance with the council’s Statement of Community Involvement (SCI). A public consultation such as this is would usually last 6 weeks but because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for</p>



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		<p>West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>

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		<p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p>
Richard Woodhead (lpr1340)	<p>Just to register my objection to the size of this development.</p> <p>I am not a NIMBY, and whilst accepting that some local housing developments are going to be necessary it strikes me that the proposal to build 2500 houses is over the top, and represents a total over development. There is just not the local infrastructure to cope with such a massive development.</p> <p>One of the many attractions of this area are the pockets of open countryside and to be building on so much green belt and farm land is inevitably going to have a significant effect on the standard of living for those of us living in the area. Tarmacing over an attractive part of the district would be an immense shame and also have a detrimental effect on the general standards of the area as well as impacting on wildlife and general light and air pollution. A large scheme like this I suspect will see houses crowded in together and represent the thin of the wedge of yet more land grab in the future as well as having an immediate dumbing down of the general area. There is just not the local capacity for such a large increase in the housing stock.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>

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		<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Chris Relf (lpr1342)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons:-</p> <ol style="list-style-type: none"> <li data-bbox="481 1257 1335 1342">1. The vast majority of residents in Upper Bucklebury are against this development and many have already registered their objections but as no information has been sent out by WBC many are not aware of</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the application. I feel that the consultation period should be extended and that ALL residents should be formally written to.</p> <ol style="list-style-type: none"> <li>2. This development would, effectively, join Upper Bucklebury to Thatcham thus effectively removing the rural aspect of the area. As it is cited in the Bucklebury Vision and Plan to maintain a strong green belt, which was approved and agreed with WBC, it should be considered as supplementary planning consideration. On page 22 of WBC documentation regarding planning “<i>particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.</i> So this new development is in contradiction to WBC’s own intentions.</li> <li>3. A previous application was rejected by the Secretary of State in 2017 (500 houses at Seige Cross) so why is WBC now considering this site in light of previous objection. What has changed and, knowing this has been refused once why have funds been spent so far? At least part of this site was deemed Not Developable in 2013 – what has changed?</li> <li>4. It is a massive over development of the countryside and will have a significant impact on traffic in the area, especially on the route into Thatcham and Newbury and towards the station, which are already heavily congested at peak times.</li> <li>5. Traffic, and speeding, through Upper Bucklebury is already of a major concern due to the Primary School and with an increase of 10% this will only worsen the situation. Hart’s Hill is not suitable for extra pedestrian or cycle use.</li> <li>6. It will completely surround the Crematorium in Thatcham, which was placed away from residential properties and has constraints placed on it.</li> <li>7. This development is the size of Hungerford yet there is no infrastructure in place, no town facilities, no doctor’s surgery (on the plans I have seen). Hungerford with almost the same number of houses has school, a high street, surgeries, a large carpark – there is nothing in this development. Thatcham surgeries are already</li> </ol>	<p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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	<p>over-subscribed and I doubt Chapel Row would be able to accommodate extra patients.</p> <p>8. Will there be a full archaeological survey on the area bearing in mind that there were skirmishes and camps in the area during the civil war in 1644.</p> <p>9. The damage to the local flora and fauna in the area would be immense not to mention the light, noise, and air pollution, plus the flooding. Would the developers implement flood alleviation measures?</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go</p>

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		<p>ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the</p>

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		<p>Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Alan Lindsay (lpr1343)	<p>I would like to register my opposition to the North East Thatcham site allocation for a proposed 2500 new homes etc.</p> <p>The main reasons of objection are:</p> <p>A major over development of a flawed site. The proposed 2500 houses could create a minimum of 5000 extra vehicles: 10000 vehicle movements per day.</p> <p>Increased traffic will be forced to use inadequate local routes ie The Ridge, Harts Hill etc, to access M4 / A34 plus no bridge planned at Thatcham railway crossing so increased congestion and local pollution.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development</p>

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	<p>No attention to a probable / likely increased use of AONB common land and heathland by people /dogs causing a definite disaster for existing wildlife / ground nesting birds and loss of habitat .</p> <p>Major loss of rural countryside and nature corridors between villages and parishes. All this will be lost forever, there is always somewhere else, more suitable, available to build our houses when needed.</p> <p>Overall this major development is not needed in our changing world of Covid / working habits thus creating empty local commercial sites and offices ideal or perhaps with no alternative other than conversion to residential use.</p>	<p>without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that</p>



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		<p>development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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		<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>

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Christine Alder (lpr1344)	<p>I am writing to <b>OPPOSE</b> any further development in Thatcham. I have been a resident of the town for over 10 years and have raised my young family here. Since we have moved here there has been a new site along by the Garden Centre, which seemed to have appeared after the Flood Defence with implemented and strangely enough now the one that is next to where we live (&lt;personal information removed&gt;) you are now wanting to build on the back of this? There has been very little investment in any infrastructure – as admitted in your own report.</p> <p>Also back in 2013 Site Ref: THA030 was determined to be “NOT developable” there we other fields also. So why has this not been mentioned in the new plans? The flood defence work was designed taking in to account of the existing development of Thatcham, Surely if this development were to go ahead it would completely change the picture, as all the farmland would no longer be available to soak up the rainfall. The children’s play park at Kennet Health was dug up as part of the flood defence there and this is now wetter than it ever was before, so something isn’t working correctly as it should. Currently after all the rainfall, you only need to walk in these fields and you can see how water logged they are, worse than they have been in years and this is stopping it coming down and straight in to Dunstan park (the park of it that doesn’t have the flood defence in front of it)</p> <p>My objections are as follows:-</p> <p><b><u>PUBLIC AMENITIES</u></b></p> <p>Our existing public right of way (Many of them as we live in the middle of where they are looking to build) will be lost in the new development - we do not need ‘public green spaces for all to use’ - we have the countryside. We moved to our home as desperately wanted to be nearer the countryside and currently when we look out of our windows we see hills, sheep and many enjoying the countryside. I know for one, that having this on our doorstep</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure</p>

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	<p>has hugely helped my families mental health as in one minute we can walk out our front door and be in the fields around us.</p> <p>Our current leisure amenities are desperately underfunded, and building further 'amenities', in the new development offers nothing to existing residents but will infact make it much worse and unusable for all.</p> <p>At present our library, toilets, youth services and leisure centre are desperately underfunded and barely accessible. Community halls struggle for bookings and this is all before another potential 10,000 people all start to try and use.</p> <p><b><u>SEWAGE/WATER</u></b></p> <p>Thames Water are already struggling to cope with the current population in Thatcham, and have been served notice to clean up their act.</p> <p>Despite the recent flood allevation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The new houses currently being built in Woolhampton are testimony to this, as water ran through the buildings during construction and the road was covered in sludge. The field opposite it is always flooded too.</p> <p>The Mill house roundabout is more often than not flooded and running down Harts Hill Road (and this is now after the flood defence was put in).</p> <p>We on Harts Hill often end up with low water pressure and Bucklebury is at least without water every month or so, this is even after the year that Harts Hill road was shut (causing chaos) we were all told this was to put in new pipes and water pumping station to Bucklebury, all of which over a year later has still not been commissioned and the old pipes are still in the ground and</p>	<p>which will include a new community park linking Thatcham to the AONB.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the</p>

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	<p>causing issues for us all. How do you think this will cope with another 2,500 homes added?</p> <p>The construction of the flood alleviation works ran over time and budget and were shoddily 'completed' to the point where the very residents who were to benefit from the works were fed-up, and formed a residents group. There is little appetite for further construction works in any form across the town.</p> <p><b><u>ESSENTIAL SERVICE</u></b></p> <p>I have on several occasions, called the police to report anti-social behaviour, especially from The Mill House public house and cars speeding along Floral way and doing wheel spins constantly around the roundabout and am told 'there are no patrols in Thatcham tonight' as they simply do not have the manpower. 2500 additional homes will exacerbate this, will there be extra provisions for this?</p> <p>We have no A&amp;E department at our local hospital, no maternity unit and waiting times for routine doctors' appointments is in some cases are 12 weeks and that was pre Covid!</p> <p>The report states a need for two primary schools, but there is no mention of a secondary school, I can assure you <i>&lt;personal information removed&gt;</i>, that this school is already over subscribed and many have been turned away and have to travel to Newbury and this is a staggering 20-25% of Thatcham's children, as there aren't enough spaces. Schools struggle to recruit teachers, and we are about to close a primary school in Thatcham as no demand. Also what would this do to a small school such as Bucklebury Primary School, which relies on those coming up from Thatcham?</p> <p>If you look at the last census you will understand that on average number of people in a house hold is 2.6, of which these 19.6% fall in to the age bracket which is 5-19, roughly around 1275 children which is indeed school age, but only 1/3 of these would be primary school and a staggering 2/3 would be</p>	<p>LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site</p>

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	<p>secondary, but yet there is no mention of building a secondary school? Also with this amount of extra children how will groups such as Cubs, Guides, toddler groups etc cope?</p> <p><b><u>ENVIRONMENT</u></b></p> <p>Thatcham already suffers with light pollution; the dawn chorus can be heard at 1am locally!</p> <p>The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent, merging everything in to the New Thatcham.</p> <p>Thatcham Vision found residents in favour of Brown Field development.</p> <p>There is no commitment to net-zero carbon mentioned in the report. Have you seen the state of the roads in Thatcham? We were promised that Harts Hill would be resurfaced after the Thames Water works were completed, this never happened, would seem the budget ran out as over ran. The road is disintegrating, full of potholes and water is constantly running down the road.</p> <p>Since the Flood Defence works were done, Floral way is also full of potholes too and you have to drive like a slalom to avoid hitting them one after another!</p> <p>Please advise where can the environmental impact study be viewed? We are concerned that we have many endangered species (including nightjars, adders, glowworms, slow worms, woodlarks, foxes, badgers, deer and bats) all of which will suffer a decline when disturbed. Can you please advise what commitments West Berkshire have signed to in terms of protecting the countryside and biodiversity?</p>	<p>will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> </ul>

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	<p><b><u>TRANSPORT</u></b></p> <p>Traffic is already congested at the Floral Way and Siege Cross Roundabouts– right down to the train station. We often spend a good few minutes trying to get out of The Spinney on to Harts Hill in the mornings (Pre covid) The area is further congested with Francis Baily school run traffic and the new ‘Orcas’ which are an accident waiting to happen.</p> <p>HGV’s travel in these areas all day, every day, due to the distribution centres in Pipers Way and we have noticed more and more in the last year as they also cut through to the M4 – the addition of more housing will make this worse.</p> <p>Northfield Road, Park Lane and particularly Harts Hill Road will become rat-runs to avoid these roundabouts.</p> <p>There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters?</p> <p><b><u>ECONOMY</u></b></p> <p>It is beggars-belief that Newbury is described as being the ‘central hub’ for shopping, and will continue to be so. Whoever, wrote this clearly has no knowledge of the area at all. If you live in North or East Thatcham is it almost as quick to travel to Calcot, Reading or indeed Basingstoke – and the retail offerings (and parking) are far greater. To make Newbury a central hub, the housing has to be in Newbury. Since we moved to Thatcham, we hardly ever go to Newbury, firstly it is a nightmare to park and secondly unless you want a coffee shop or to eat out there is absolutely nothing to go there for. We always go to Basingstoke or Reading now and will continue to do so.</p>	<ul style="list-style-type: none"> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The evidence base for the LPR including matters relating to wildlife issues can be found <a href="#">here</a>. The Sustainability Appraisal for the LPR will also be of interest.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning</p>

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	<p>Thatcham has few high quality jobs, most residents are self-employed or commute. In recent years three major banks have pulled out of our High Street, and pubs are unsustainable. The Plough has closed, and The Mill House changes hands with alarming frequency and again is up to Let. Both main supermarkets are overpriced, (compared with, for example, Tesco) – the development requires 40% affordable housing – people in affordable housing do not shop in Waitrose!?!</p> <p>This development does nothing more than create a dormitory town which does nothing to integrate with the existing town.</p> <p>Could you please provide details on how you proposed to run affordable housing schemes? The housing association properties in the area are poorly constructed – I have friends constantly on the phone to their housing association to rectify faults with windows and doors that don't close properly etc. Panorama recently spoke out <a href="https://www.bbc.co.uk/programmes/m000pk2b">https://www.bbc.co.uk/programmes/m000pk2b</a></p> <p>I can't envisage any developer providing 40% affordable housing, without cutting corners – it simply isn't financially viable unless there is a sting in the tail, or they reduce the percentage required.</p> <p>Finally, and probably most importantly, I believe the Government algorithms for calculating the housing requirement are currently under scrutiny.</p> <p><a href="https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993">https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993</a></p> <p>Please advise if your current consultation is in line with this, takes the Pandemic into account and the loss of our town centres ?</p> <p>From my understanding Hungerford already has the full working infrastructure that could take the 2,500 homes? It has the High Street,</p>	<p>application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and</p>



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	<p>schools, a railway station with much larger parking, doctors surgeries and much more.</p> <p>I look forward to hearing from you in due course.</p>	<p>help to boost the vibrancy and vitality of town and local centres.</p> <p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p>

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		<p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>
Emma Ghulam (lpr1346)	<p>I am writing to OPPOSE any further development in Thatcham. I have been a resident of the town for over 10 years and have raised my young family here. Since we have moved here there has been a new site along by the Garden Centre, which seemed to have appeared after the Flood Defence was implemented and strangely enough now the one that is next to where we live (&lt;personal information removed&gt;) you are now wanting to build on the back of this? There has been very little investment in any infrastructure – as admitted in your own report.</p> <p>Also back in 2013 Site Ref: THA030 was determined to be “NOT developable” there we other fields also. So why has this not been mentioned in the new plans? The flood defence work was designed taking in to account of the existing development of Thatcham. Surely if this development were to go ahead it would completely change the picture, as all the farmland would no longer be available to soak up the rainfall. The children’s play park at Kennet Health was dug up as part of the flood defence there and this is now wetter than it ever was before, so something isn’t working correctly as it</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>

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	<p>The report states a need for two primary schools, but there is no mention of a secondary school, I can assure you <i>&lt;personal information removed&gt;</i>, that this school is already over subscribed and many have been turned away and have to travel to Newbury and this is a staggering 20-25% of Thatcham's children, as there aren't enough spaces. Schools struggle to recruit teachers, and we are about to close a primary school in Thatcham as no demand. Also what would this do to a small school such as Bucklebury Primary School, which relies on those coming up from Thatcham?</p> <p>If you look at the last census you will understand that on average number of people in a house hold is 2.6, of which these 19.6% fall in to the age bracket which is 5-19, roughly around 1275 children which is indeed school age, but only 1/3 of these would be primary school and a staggering 2/3 would be secondary, but yet there is no mention of building a secondary school? Also with this amount of extra children how will groups such as Cubs, Guides, toddler groups etc cope?</p> <p>ENVIRONMENT</p> <p>Thatcham already suffers with light pollution; the dawn chorus can be heard at 1am locally!</p> <p>The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent, merging everything in to the New Thatcham.</p> <p>Thatcham Vision found residents in favour of Brown Field development.</p> <p>There is no commitment to net-zero carbon mentioned in the report. Have you seen the state of the roads in Thatcham? We were promised that Harts Hill would be resurfaced after the Thames Water works were completed, this never happened, would seem the budget ran out as over ran. The road is disintegrating, full of potholes and water is constantly running down the road.</p>	<p>should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p>

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	<p>Since the Flood Defence works were done, Floral way is also full of potholes too and you have to drive like a slalom to avoid hitting them one after another!</p> <p>Please advise where can the environmental impact study be viewed? We are concerned that we have many endangered species (including nightjars, adders, glowworms, slow worms, woodlarks, foxes, badgers, deer and bats) all of which will suffer a decline when disturbed. Can you please advise what commitments West Berkshire have signed to in terms of protecting the countryside and biodiversity?</p> <p>TRANSPORT</p> <p>Traffic is already congested at the Floral Way and Siege Cross Roundabouts– right down to the train station. We often spend a good few minutes trying to get out of The Spinney on to Harts Hill in the mornings (Pre covid) The area is further congested with Francis Baily school run traffic and the new ‘Orcas’ which are an accident waiting to happen.</p> <p>HGV’s travel in these areas all day, every day, due to the distribution centres in Pipers Way and we have noticed more and more in the last year as they also cut through to the M4 – the addition of more housing will make this worse.</p> <p>Northfield Road, Park Lane and particularly Harts Hill Road will become rat-runs to avoid these roundabouts.</p> <p>There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters?</p> <p>ECONOMY</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It is beggars-belief that Newbury is described as being the ‘central hub’ for shopping, and will continue to be so. Whoever, wrote this clearly has no knowledge of the area at all. If you live in North or East Thatcham is it almost as quick to travel to Calcot, Reading or indeed Basingstoke – and the retail offerings (and parking) are far greater. To make Newbury a central hub, the housing has to be in Newbury. Since we moved to Thatcham, we hardly ever go to Newbury, firstly it is a nightmare to park and secondly unless you want a coffee shop or to eat out there is absolutely nothing to go there for. We always go to Basingstoke or Reading now and will continue to do so.</p> <p>Thatcham has few high quality jobs, most residents are self-employed or commute. In recent years three major banks have pulled out of our High Street, and pubs are unsustainable. The Plough has closed, and The Mill House changes hands with alarming frequency and again is up to Let. Both main supermarkets are overpriced, (compared with, for example, Tesco) – the development requires 40% affordable housing – people in affordable housing do not shop in Waitrose !?!</p> <p>This development does nothing more than create a dormitory town which does nothing to integrate with the existing town.</p> <p>Could you please provide details on how you proposed to run affordable housing schemes ? The housing association properties in the area are poorly constructed – I have friends constantly on the phone to their housing association to rectify faults with windows and doors that don’t close properly etc. Panorama recently spoke out <a href="https://www.bbc.co.uk/programmes/m000pk2b">https://www.bbc.co.uk/programmes/m000pk2b</a></p> <p>I can’t envisage any developer providing 40% affordable housing, without cutting corners – it simply isn’t financially viable unless there is a sting in the tail, or they reduce the percentage required.</p>	<p>Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The evidence base for the LPR including matters relating to wildlife issues can be found here. The Sustainability Appraisal for the LPR will also be of interest.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Finally, and probably most importantly, I believe the Government algorithms for calculating the housing requirement are currently under scrutiny.</p> <p><a href="https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993">https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993</a></p> <p>Please advise if your current consultation is in line with this, takes the Pandemic into account and the loss of our town centres ?</p> <p>From my understanding Hungerford already has the full working infrastructure that could take the 2,500 homes? It has the High Street, schools, a railway station with much larger parking, doctors surgeries and much more.</p> <p>I look forward to hearing from you in due course.</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>The LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in the LPR do not list or cross-refer to all other policies that may be relevant.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single</p>



Respondent (with lpr ref)	Response	Council Response
		<p>person households, the elderly, those households with specific needs, those wishing to build or commission their own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

Respondent (with lpr ref)	Response	Council Response
Susan Lloyd (lpr1347)	<p>I would like to lodge my strong objection to the proposed development around Siege Cross Farm and Colthrop Manor and along Floral way, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. this constitutes a massive over-development of the area</li> <li>2. it is being built on greenfield sites, rolling hills and virgin farmland. (When more and more people are working from home, office buildings will be available to be converted into flats and houses)</li> <li>3. building on this land will surely result in the flooding of all properties and houses south of the A4 every year</li> <li>4. building close to, and around, the crematorium goes against previous planning rules</li> <li>5. it will result in the ruining of the ruralness of Upper Bucklebury</li> <li>6. traffic on the A4 is already stationary at many times of the day. The congestion when schools empty will be unbearable.</li> <li>4. the traffic using 'rat runs' thru the local villages will also be unbearable</li> <li>8. and the resulting pollution thereof</li> <li>9. following Brexit is there really a need for so many new houses, especially in the over-crowded South East</li> <li>10. this over-sized development was turned down by the Secretary of State in 2017, so</li> <li>11. it is wrong for the WBC to be now advocating this site for development, and is it not a huge waste of tax-payers' money to be allowing/promoting this.</li> <li>5. there seems to have been no contact with residents and everyone who would be affected. And no reference to the Bucklebury Vision and Bucklebury Plan which should protect our village from being joined with Thatcham.</li> </ol>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning</p>

Respondent (with lpr ref)	Response	Council Response
		<p>and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
Nicola Padbury (lpr1348)	<p>We would like to strongly object to the planning proposal to build a staggering 2500 houses on the farmland between Upper Bucklebury, the A4 and Floral Way.</p> <p>What a hideous project as Upper Bucklebury is one of the most sort after villages in Berkshire. It's quiet location would no longer be, giving way to a built up over developed area. There are insufficient school, doctor, shop and road facilities for such a massive increase through the village. The potential of an extra 5000 people, at least 2000 extra cars will have a huge impact on the local environment, together with the pollution issues, and impact on any remaining woodlands that would not be pulled down. Millions of wildlife would also be affected by the lack of woodland. Narrow country lanes would all be demolished to make way for faster busier roads, causing dangers to walkers, children, horses, animals and cyclists.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Property prices for us current village home owners would plummet, who would want to live in yet another over developed location. !</p> <p>We urge you to consider a smaller development in another location that may not be so affected by these issues, as the picturesque small village of Upper Bucklebury.</p> <p>It is a shame developers never have a conscience, only a hunger to make more money.</p> <p>I trust you will acknowledge receipt of my email, as this is of great importance to us.</p> <p>Many thanks for taking the time to read this.</p>	<p>infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These</p>

Respondent (with lpr ref)	Response	Council Response
		<p>policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus</p>

Respondent (with lpr ref)	Response	Council Response
		development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.
Andy Walton (lpr1349)	<p>I would like to strongly <b>OBJECT</b> to the <b>NE Thatcham Development of 2500 homes</b> you are proposing as part of the Local Plan Review 2020 -2037 Emerging Draft December 2020 document. My reasons are:</p> <p><b><u>Closing of gap between Thatcham and Upper Bucklebury</u></b> The proposed large scale housing development shows no considered planning or analysis of housing, infrastructure or community need. Rather than meeting this need and the identification and use of suitable brown field sites to do so, the focus appears to be the use of a large parcel of high grade agricultural land and greenfield site which is in an inappropriate and unsuitable location for a large scale housing development. Not least, the proposed site for the housing development breaks the strategic gap which exists between Thatcham and Upper Bucklebury and would inevitably lead to Thatcham and Upper Bucklebury becoming one.</p> <p><b><u>Increase in Traffic through Upper Bucklebury</u></b> There will be a significant increase in the numbers of commuters and other road traffic users who will use the back routes through the villages to avoid the congestion on the A4 and around Thatcham should the proposal go ahead. Upper Bucklebury will see far in excess of the percentage suggested of traffic going through the village towards Reading and along Burdens Heath towards the A34 and M4. The roads, and villages they run through, were not designed to support this level of increased traffic and where the health and safety of residents of all ages in the villages is compromised. The speed restrictions along Burdens Heath, which has no pavement, are often not observed and this road is already dangerous for pedestrians.</p> <p><b><u>Proximity to North Wessex Downs ANOB and Impact on wildlife</u></b></p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Bucklebury Common lies within the North Wessex Downs AONB and is a protected habitat for wildlife. A major reason it exists is to conserve and protect the diversity of flora and fauna. This is especially important where often native species are in decline. The close proximity and scale of the proposed development will have a significant detrimental impact on local nature and wildlife. A resulting increase in visitors to the Common will mean increased disturbance of nesting sites and habitats and will, over time, cause a detrimental effect on the species living within the Common. Damage caused by the number of 4x4 vehicles illegally driving through the common would be more likely to increase. Volunteers from Upper Bucklebury and the surrounding parish work hard to maintain the Common and reduce the rubbish, waste and damage it already suffers.</p> <p><b><u>Dark skies</u></b> The scale of the proposed development and resulting light pollution will have a significant environmental and public impact of further reducing dark skies. It will have a negative impact on wildlife and their habitats and will have a detrimental effect on the night sky for residents in Upper Bucklebury and the surrounding parish.</p> <p><b><u>Impact on Thatcham Station</u></b> An additional 2,500 homes and their households will have a hugely negative impact on the local road networks, particularly on the road to the Thatcham level crossing especially during peak times in the morning and evening. (On occasion, I have waited in traffic for over 30 minutes to cross the railway at Thatcham station in the evening rush hour.) The A4 will experience a significantly higher volume of traffic as will local roads. This is not a sustainable solution for now and even less so with the proposed NE Thatcham development. Thatcham station does not have adequate parking facilities at present. No consideration has been given to the significant increase in numbers of people travelling by train particularly to Reading and London if the development went ahead.</p> <p><b><u>Health care</u></b></p>	<p>package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Healthcare services are already stretched locally. Prior to Covid it could take up to 3 weeks to get a non-urgent appointment at the doctors, even urgent appointments weren't available on the same day. The current healthcare provision is inadequate without any further development. The NE Thatcham development proposal doesn't include any information to support the increase of 2,500 houses and households and the demand on stretched healthcare services locally and regionally.</p> <p><b><u>This level of development is inappropriate for West Berkshire</u></b> Given the flood-plain and AONB, West Berkshire is already at the limit of its development potential. The increase in size of the no-development zones around AWE Aldermaston and Burghfield have further reduced the area available for development. As such, either the no-development zone around the AWE bases needs to be challenged and reverted back to its previous size, or the total number of houses planned needs to be scaled back in line with the new restrictions. I hope you will consider my points of objection in your consultation process.</p>	<p>parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

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		<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>
Claire Francis (lpr1350)	<p>I write to express my concern for the plan of the above.</p> <p>These plans will affect everyone, from loss of wildlife, pollution, traffic, over crowding, school places, doctors / dentists, unemployment.</p> <p>There doesn't seem to be any plans for amenities when most are already at capacity.</p> <p>During lockdown we have walked this area very much to enjoy the nature and countryside and it would be a great loss.</p> <p>It could affect the flooding in Thatcham, after all the money that has just been spent on this scheme.</p> <p>It would a great shame if this got the go ahead.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation</p>

Respondent (with lpr ref)	Response	Council Response
		<p>18 consultation to strengthen the Council’s policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thattham to the AONB. This will be accessible to all.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thattham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Peter Warne (lpr378)	<p>I first moved to Thattham 42 years ago and then, in 1994, to Upper Bucklebury. My objections relate specifically to Upper Bucklebury but also to Thattham.</p> <p>It is important to bear in mind that Upper Bucklebury is within the AONB and that its separation from the urban sprawl of Thattham is a vital part of its rural character and an important factor in the quality of life enjoyed by its residents. The ultimate result of this planned development would be the virtual absorption of this village into Thattham. At the very least, the considerable increase in vehicle traffic through the village will add to the existing traffic calming issues and the danger to pedestrians, cyclists and horse riders.</p> <p>The impact vastly increased traffic on our local roads is a massive concern. The A4 is already extremely busy in morning and evening rush hours (in normal times) and as the number of homes and thus vehicles expands more and more drivers will use our local rural roads as "rat runs" to avoid the jammed main road. Broad Lane and its continuation through Chapel Row,</p>	<p>Comments noted. In relation to the comment regarding the AONB, a landscape sensitivity assessment has been undertaken for the site and will be published with the draft version of the LPR to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the draft version of the LPR will set out that a landscape and visual impact assessment is undertaken for the site which will be informed by the landscape sensitivity assessment. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p>Southend Bradfield past Englefield Park to join the A4 or M4 are simply inadequate to carry substantially more traffic safely.</p> <p>Also of concern is the likely huge increase in new Thatcham residents, understandably, using Bucklebury Common, Blacklands Copse and other nearby countryside for leisure purposes. This has been a noticeable side effect of the recent Covid 19 lockdowns. Whilst most people behave responsibly a minority do not, evidenced by the increase in littering, fly tipping and hooligans churning up footpaths and tracks with 4x4s and motor cycles. Our local wildlife will, no doubt, also be threatened by the increase in human activity.</p> <p>The green belt indicated on the plan maps is only vaguely described but it will certainly fail to compensate for the destruction of the present vista over the Kennet Valley from the Southern edge of Blacklands Copse as the footpath continuation of Long Grove emerges from the copse.</p> <p>In the village itself both Peaches Store and the Cottage Inn may well benefit from an increase in trade although, in the case of the pub this may not be altogether beneficial to residents of Broad Lane and Long Grove. It is hard to foresee any benefit to Upper Bucklebury but easy to see many downsides. Moving on to Thatcham the addition, eventually, of 2,500 homes, increasing the population by some 25% with minimal addition to the infrastructure of the town will merely exacerbate the unbalanced nature of the place. The size of Thatcham will be approaching that of Newbury but with a fraction of the essential infrastructure that makes a town an attractive place to live. Whilst the plan notes the benefit to the community of additional infrastructure, this seems to consist of schools (mainly to accommodate the additional children resulting from the additional population on this development) and some unspecified local shops. A notable omission is a doctors' surgery/medical centre. None of this additional infrastructure will benefit existing residents of either Upper Bucklebury or Thatcham.</p> <p>Thatcham already suffers from urban sprawl and a town centre and leisure facilities more suited to a large village than a town of 26,000 people. A further potential 10,000 inhabitants will worsen a bad situation. The main A4 road will become increasingly jammed, side roads will become rat runs and the main exit route South over the level crossing will become almost impossible, assuming no bridge will be built.</p>	<p>In relation to comments on highway impact, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks. The impacts can be reduced with suitable mitigation and the Council is developing a package of highway mitigation measures alongside further modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicle journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to comments on the impact of existing open spaces, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). The site is not within the Green Belt (no Green Belt in this District).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Changes: I would prefer no further major development of Thatcham but would suggest if some is dictated it should be at the Western end of this proposed development, ideally a maximum of 500 new homes.</p>	<p>The concern regarding infrastructure provision is noted. The council will not permit development which does not provide the infrastructure to support it. An Infrastructure Delivery Plan has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>
Sarah Strong (lpr1351)	<p>We are writing as a family to voice our strong opposition to the proposed future development in Thatcham of 2500 homes.</p> <p>We live at &lt;personal information removed&gt;and have lived in Thatcham for 19 years. We moved to our current house in 2011 and what immediately drew us to want to live here was its proximity to the surrounding countryside and being on the edge of the town. We walk our dog in the fields behind our home everyday and love the fact that we can just walk out of our door to get there. We regularly walk from Thatcham up to Cold Ash and Bucklebury and enjoy the views from all the fields that you propose to build on. During lockdown, the ability to get outside and walk in beautiful countryside has greatly enhanced our ability to cope and improved our mental health during this challenging time. Your proposals would impact us hugely positioning our home right in the centre of this vast development so instead of seeing sheep out of our window we would see nothing but rooftops. Access to countryside would have to involve a drive in the car to get there if we didn't want to first weave our way through a gigantic housing estate.</p>	<p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the</p>

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	<p>In the past two years we have experienced the huge disruption and noise from the construction of the flood defence scheme in the field adjacent to our home. The noise during this time was unbearable at times and the developer themselves admitted as much when they brought round bottles of wine to each household to apologise for the disturbance. Then the replacement of water pipes and the upgrading of the water pumping station on Harts Hill Road which shut the road for months meaning a detour of 15 minutes to transport our children to school in Bucklebury. The thought of being surrounded by a building site for potentially 10 years with the number of houses proposed is distressing.</p> <p><b>FACILITIES</b></p> <p>When looking at the area covered by this potential development it is staggering, and looks to add another 50% at least to the size that Thatcham already covers. The town centre just does not have anywhere near the services, or facilities to meet the demands of this number of additional homes. You propose to build new centres such as by the mill roundabout but I cannot see what would fit there as an additional resource without building on the park and it already has all the units filled with takeaways, hairdresser and the coop.</p> <p>Our current leisure amenities are desperately underfunded and inadequate for the number of people currently living in Thatcham. It is sometimes almost impossible to find a parking space at the leisure centre for prepaid for swimming lessons (Pre-COVID) and more often than not there is not one working shower to rinse off after these swimming sessions.</p> <p>At present our library, toilets and youth services are desperately underfunded and barely accessible. The library is often staffed by volunteers and the toilet block in the town only narrowly escaped closure recently following strong opposition from local residents.</p>	<p>context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated</p>



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	<p>SEWAGE/WATER</p> <p>Thames Water are already struggling to cope with the current population in Thatcham, and have been served notice to clean up their act. There seems to be never ending works to patch up problems with frequent road closure to deal with leaks etc.</p> <p>Despite the recent flood alleviation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The fields above the flood alleviation scheme where more homes are proposed are completely waterlogged as the water is held back by the bund. Imagine what would happen if this ground was concreted over not giving any field to absorb this water?</p> <p>The Mill house roundabout is more often than not flooded and running down Harts Hill Road (and this is now after the flood defence was put in).</p> <p>We on Harts Hill often end up with low water pressure and Bucklebury is at least without water every month or so, this is even after the year that Harts Hill road was shut (causing chaos) we were all told this was to put in new pipes and water pumping station to Bucklebury, all of which over a year later has still not been commissioned and the old pipes are still in the ground and causing issues for us all. How do you think this will cope with another 2,500 homes added?</p> <p>ESSENTIAL SERVICES</p> <p>We regularly experience anti-social behaviour nearby especially from The Mill House public house and cars speeding along Floral way and doing wheel spins constantly around the roundabout. There are no police patrols to deal with this as they simply do not have the manpower. 2500 additional homes will exacerbate this, will there be extra provisions for this?</p>	<p>water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>The NPPF 2021 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: ...are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. The Police are consulted as part of the LPR process and planning application process to ensure that both functions are informed, positively planned, and co-ordinated with other measures such as financial contributions to make a significant contribution to tackling crime.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern</p>

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	<p>We have no A&amp;E department at our local hospital, no maternity unit and waiting times for routine doctors' appointments is in some cases are 12 weeks and that was pre Covid!</p> <p>ENVIRONMENT</p> <p>The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent, merging everything in to the New Thatcham.</p> <p>Thatcham Vision found residents in favour of Brown Field development.</p> <p>We are concerned about the impact on the habitats of all the wildlife currently living in the fields and woods that would be destroyed to make way for this development. This includes potentially endangered species (including nightjars, adders, glowworms, slow worms, woodlarks, foxes, badgers, deer and bats) all of which will suffer a decline when disturbed. Can you please advise what commitments West Berkshire have signed to in terms of protecting the countryside and biodiversity? Providing 'public green spaces for all to use' does not compensate for the loss of these habitats.</p> <p>TRANSPORT</p> <p>Traffic is already congested at the Floral Way and Siege Cross Roundabouts– right down to the train station.</p> <p>HGV's travel in these areas all day, every day, due to the distribution centres in Pipers Way</p> <p>Roads are in an awful state, covered in potholes and not wide enough to handle and increase in traffic.</p>	<p>and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p>There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters?</p> <p>Bus services to Newbury and Reading are limited particularly from North Thatcham. I would have to walk 15 minutes into the town centre to get to a bus stop to take me into Newbury. The bus service is also so expensive compared to driving that I inevitably choose the latter.</p> <p>I am very concerned that further development will only add to put further strain on already struggling resources and crumbling infrastructure and strongly oppose it going ahead.</p> <p>I look forward to hearing your response.</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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John Peacock (lpr1352)	<p>I write in the strongest terms to voice my objection to the proposed development of 2500 houses between thatcham and Upper Bucklebury.</p> <p>My main concern is the impact of building what in effect is a small town at the very edge of this area of natural beauty and the devastating impact on the environment this would cause.</p> <p>At this moment in our history to undertake such an activity seems at best reckless and at worst, against every voice of reason and balance, citing urbanisation and breaking up the natural world as catastrophic for the future of our planet.</p> <p>I do not have the time to construct a detailed and more thorough technical argument but would summarise the main elements of my objection as:-</p> <p>Light and noise pollution</p> <p>Loss of green space</p> <p>Flooding risks</p> <p>Emissions and waste from increased homes</p> <p>Impact on the wildlife and flora in this special area</p> <p>Traffic impact and safety of increased vehicles along rural roads.</p> <p>Impact of 3 or 4 thousand more people on the walking areas of the common and surrounding woodlands, footpaths and bridleways.</p> <p>Others I know will provide substantive arguments against the process, identifying the flaws in the WBC approach, source data and information used in the decision making. For me I just wish to say, no to this proposal, look to</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local</p>

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	<p>alternatives which do not destroy the countryside and most importantly, look to build a cohesive plan which puts the impact on our climate and protection of our natural resources at the forefront and heart of every decision in every area of your responsibility West Berkshire Council.</p>	<p>environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all</p>

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		<p>development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>

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		<p>strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include</p>

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		a new community park linking Thatcham to the AONB. This will be accessible to all.
David Copas (lpr1429)	<p>[Letter attached. Other comments added to other relevant consultation points]</p> <p>SP17 sets out that ‘The Council will be supportive of proposals which have regard, and positively respond, to the master-planning work contained in the Thatcham Strategy Growth Study (2020)’. It then lists features the NE Thatcham Strategic allocation may be expected to deliver. However the residents of Bucklebury and Thatcham do not see it that way and their responses should give the Council grave cause for concern. The main objections are listed below:</p> <ul style="list-style-type: none"> <li>• Flawed housing demand analysis</li> </ul> <p>The analysis of housing demand predicating this draft proposal relies on out-of-date information. It fails to take account of the most major medical, social and economic catastrophe to impact our lives in the last 100 years. The Covid – 19 pandemic has transformed the way people work, travel and their housing needs yet this factor is ignored in the proposals. Furthermore, taking WBC’s own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed.</p> <ul style="list-style-type: none"> <li>• Strategic Gap</li> </ul> <p>A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed.</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes</p>



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	<ul style="list-style-type: none"> <li>• Traffic</li> </ul> <p>A development of the scale proposed will generate considerable traffic but the analysis in the proposal underestimates the volume and impact on the Parish. It is assumed that the bulk of the new traffic will use the A4, accessed via Floral Way. However, the A4 is already overloaded at peak times and new residents will look to find alternative routes. These inevitably will be through the Parish for those looking to access the A34 and the M4. The roads through these villages are ill suited to additional traffic; they are rural, single carriageway roads mostly lacking footpaths and featuring blind bends. Speeding is a well known problem in the Parish and more cars will make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and will endanger children walking to school.</p> <ul style="list-style-type: none"> <li>• AONB and Bucklebury Common</li> </ul> <p>It is clear that the proposed development to the north-east of Thatcham involving 2500 houses would have a big influence on the local wildlife.</p> <p>The proposed development abuts Bucklebury Common and AONB. This development would have a lasting and negative impact on these special environs. The impacts fall into two categories; those that impact the AONB directly and those resulting from the inevitable increase in visitors. The Common is protected because of its flora, fauna and its situation. It contains remnants of ancient and fragile habitats that are home to rare and protected wildlife. Importantly the plants in and bounding the AONB will suffer and the Common will be put under pressure from additional visitors. The AONB is already witnessing habitat damage from walkers, cyclists and motorised vehicles. The visitor numbers, from the proposed development, would exacerbate damage to a struggling ecology.</p> <p>Bucklebury Common, one of the few remaining areas of lowland heath lies just a kilometre or so to the north-east. It is well known for some special</p>	<p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the</p>

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	<p>birds in particular the nightjar, but also the woodlark, tree pipit, stonechat and woodcock. These nest on the ground are very susceptible to disturbance especially by dogs. The development would put much more pressure on the heath and make successful breeding of these species much less likely.</p> <p>So the council's attention should focus on this impact of the proposed scheme not highlighted in the Biodiversity and Green infrastructure. Just visible at the north east edge of the plan on page 36 is the edge of Bucklebury Common, the eastern portion of which (east of the settlement of Upper Bucklebury) is an area of lowland heath, which has been restored by conservation management. This site is already subject to considerable recreational pressure. Heathland is a priority habitat identified in the Berkshire Local Nature Partnership Biodiversity Plan, and holds breeding populations of two of the priority species in the plan, Nightjar (<i>Caprimulgus europaeus</i>) and Woodlark (<i>Lullula arborea</i>). Another species on the UK's list of "Red Data" birds, Woodcock (<i>Scolopax rusticola</i>) also occurs, a species which has suffered a dramatic contraction in its UK breeding range (more than 50% in the 25 years to 2010) and numbers. These are ground nesting birds, vulnerable to disturbance. The wider area forms one the Berkshire's Biodiversity Opportunity Areas (BOA), known as Bucklebury Plateau (see - <a href="http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf">http://www.tverc.org/cms/sites/tverc/files/Buckleberry%20Plateau%20Description.pdf</a>)</p> <p>As no doubt the council is aware, lowland heath is a threatened habitat important for a number of species of wildlife. Its global distribution is limited, with the UK having about 20% of the world's remaining area. About 80% of the UK's lowland heath has been lost since 1800. The Thames Basin Heaths of north Hampshire, west Surrey and south east Berkshire are an area of Special Protection (SPA) and now benefit from planning policies requiring the provision of suitable areas of natural greenspace (SANGS) as mitigation for any new residential development within 5 km of the heathland areas.</p>	<p>IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the</p>

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	<p>In this case the site would introduce 2500 new households almost all within 2 km of Bucklebury Common, and we consider that mitigating the impact of the increased recreational pressure, and the opportunity to enhance biodiversity should have formed part of the scheme, consistent with current Local Plan Policy CS17, emerging policy SP11 and NPPF paragraphs 170 and 175.</p> <p>The restored area of Bucklebury Common referred to above is currently a relatively small fragment of heathland maintained by voluntary effort. It does though form part of a larger area within the Bucklebury Plateau BOA extending to the west of Upper Bucklebury that has potential for habitat restoration as heathland.</p> <ul style="list-style-type: none"> <li>• <b>Recommendation 7 – remove SP17 from the Local plan review.</b></li> </ul> <p><b>Conclusion</b></p> <p>In summary, I have serious concerns about the emerging draft Local Plan which can be addressed through adoption of the seven listed recommendations. Otherwise the impact on West Berkshire, Thatcham and especially the village of Upper Bucklebury will be very damaging. With increased traffic, a steady flow of visitors the consequential damage to the local environment, the character of our area would change forever and not for the better.</p> <p><b>Recommendation 7 – remove SP17 from the Local plan review.</b></p>	<p>parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Peter Weedon (lpr1353)	<p>I wish to OBJECT to the scheme on the following grounds and quote from the Stage 3 Report "Thatcham Strategic Growth Study."</p> <p>1 The development is attempting to squeeze a quart into a pint pot due and is concentrating a disproportionately high area of West Berkshire Council's housing obligations into a small percentage of its total land holdings.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy</p>

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	<p>2 The entirety of the site is outside of the existing settlement boundary of Thatcham, currently closely drawn along Floral Way, the A4 and Pipers Way. (2.12)</p> <p>3 The West Berkshire Landscape Character Assessment outlines a landscape strategy for WH4 (Cold Ash Woodland and Heathland Mosaic) , which will inform development proposals at NE Thatcham. Key principles are:</p> <ul style="list-style-type: none"> <li>• Retain the distinction between and individual identity of settlements</li> <li>• Conserve elements that mark a transition between settlement and countryside (2.36)</li> </ul> <p>The development seriously undermines the “green gap” between Upper Bucklebury and Thatcham and will ultimately merge the two.</p> <p>4 North Wessex Downs AONB Board has stated its objection to development on all the sites that make up NE Thatcham, through the HELAA process, due to the impact on the setting of the AONB and the breaking of the Floral Way boundary. (2.47)</p> <p>5 There is a risk of surface water flooding within the site along the natural drainage routes based on Environment Agency modelling (2.51)</p> <p>6 Development at NE Thatcham breaks out of the valley bottom that has defined Thatcham’s extent (4.2)</p> <p>7 It is important to note that Thatcham has few examples of hillside development, and so extending the urban grain and pattern of the immediate surroundings is unlikely to achieve a positive result. (Design Principles 4.5)</p>	<p>notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just</p>

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	<p>8 The highways strategy is to direct traffic away from rat-running through Cold Ash and Bucklebury by routing vehicle traffic southwards towards the A4. (4.21).</p> <p>This is unlikely to be effective in practice as evidenced by the increase in traffic through Upper Bucklebury every time there is an accident/congestion on the A4.</p> <p>9 This study proposes that capital funding for the new secondary school within North East Thatcham would be 50% funded by the developers, delivered through a Section 106 agreement on developer contributions. (5.2)</p> <p>I seriously question West Berkshire Council's ability to fund the balance and ongoing costs of the school.</p> <p>10 As an Upper Bucklebury resident I am also concerned with the impact of:</p> <ul style="list-style-type: none"> <li>• Increased light pollution – no reference in the document</li> <li>• Substantial increase in noise pollution and detrimental impact on quality of life – decades of construction work</li> <li>• Increased air pollution – increase in traffic</li> </ul>	<p>changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the</p>

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		<p>LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is</p>

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		<p>undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

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Deborah Jarrett (lpr1354)	<p>I would like to strongly <b>OBJECT</b> to the <b>NE Thatcham Development of 2500 homes</b> you are proposing as part of the Local Plan Review 2020 -2037 Emerging Draft December 2020 document. My reasons are:</p> <p><b><u>Closing of gap between Thatcham and Upper Bucklebury</u></b></p> <p>The proposed large scale housing development shows no considered planning or analysis of housing, infrastructure or community need. Rather than meeting this need and the identification and use of suitable brown field sites to do so, the focus appears to be the use of a large parcel of high grade agricultural land and greenfield site which is in an inappropriate and unsuitable location for a large scale housing development. Not least, the proposed site for the housing development breaks the strategic gap which exists between Thatcham and Upper Bucklebury and would inevitably lead to Thatcham and Upper Bucklebury becoming one.</p> <p><b><u>Increase in Traffic through Upper Bucklebury</u></b></p> <p>There will be a significant increase in the numbers of commuters and other road traffic users who will use the back routes through the villages to avoid the congestion on the A4 and around Thatcham should the proposal go ahead. Upper Bucklebury will see far in excess of the percentage suggested of traffic going through the village towards Reading and along Burdens Heath towards the A34 and M4. The roads, and villages they run through, were not designed to support this level of increased traffic and where the health and safety of residents of all ages in the villages is compromised. The speed restrictions along Burdens Heath, which has no pavement, are often not observed and this road is already dangerous for pedestrians.</p> <p><b><u>Proximity to North Wessex Downs ANOB and Impact on wildlife</u></b></p> <p>Bucklebury Common lies within the North Wessex Downs AONB and is a protected habitat for wildlife. A major reason it exists is to conserve and</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>



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	<p>protect the diversity of flora and fauna. This is especially important where often native species are in decline. The close proximity and scale of the proposed development will have a significant detrimental impact on local nature and wildlife. A resulting increase in visitors to the Common will mean increased disturbance of nesting sites and habitats and will, over time, cause a detrimental effect on the species living within the Common. Damage caused by the number of 4x4 vehicles illegally driving through the common would be more likely to increase. Volunteers from Upper Bucklebury and the surrounding parish work hard to maintain the Common and reduce the rubbish, waste and damage it already suffers.</p> <p><b><u>Dark skies</u></b></p> <p>The scale of the proposed development and resulting light pollution will have a significant environmental and public impact of further reducing dark skies. It will have a negative impact on wildlife and their habitats and will have a detrimental effect on the night sky for residents in Upper Bucklebury and the surrounding parish.</p> <p><b><u>Impact on Thatcham Station</u></b></p> <p>An additional 2,500 homes and their households will have a hugely negative impact on the local road networks, particularly on the road to the Thatcham level crossing especially during peak times in the morning and evening. The A4 will experience a significantly higher volume of traffic as will local roads. This is not a sustainable solution for now and even less so with the proposed NE Thatcham development.</p> <p>Thatcham station does not have adequate parking facilities at present. No consideration has been given to the significant increase in numbers of people travelling by train particularly to Reading and London if the development went ahead.</p>	<p>packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the</p>

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	<p><b><u>Health care</u></b></p> <p>Healthcare services are already stretched locally. Prior to Covid it could take up to 3 weeks to get a non-urgent appointment at the doctors, even urgent appointments weren't available on the same day. The current healthcare provision is inadequate without any further development. The NE Thatcham development proposal doesn't include any information to support the increase of 2,500 houses and households and the demand on stretched healthcare services locally and regionally.</p> <p><b><u>This level of development is inappropriate for West Berkshire</u></b></p> <p>Given the flood-plain and AONB, West Berkshire is already at the limit of its development potential. The increase in size of the no-development zones around AWE Aldermaston and Burghfield have further reduced the area available for development. As such, either the no-development zone around the AWE bases needs to be challenged and reverted back to its previous size, or the total number of houses planned needs to be scaled back in line with the new restrictions.</p> <p>I hope you will consider my points of objection in your consultation process.</p>	<p>Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council</p>

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		is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.
Melanie Pocock (lpr1355)	<p>I wish to add my voice to the many objecting to the proposal to build 2,500 homes in North Thatcham.</p> <p>I object to the plans on every level and fail to find any positive from carrying out this development.</p> <p>My main concerns are the impact on the local environment, the increased levels of pollution from traffic, light, noise, personal waste, litter.....</p> <p>The loss of rural countryside, the loss of the quiet lanes, increased footfall and traffic in the green spaces of Upper Bucklebury and surrounding areas.</p> <p>This is green belt, it is not supposed to have a town in it! Villages are the quintessential backbone of rural counties such as ours, they are not supposed to be attached to a sprawling new housing development.</p> <p>At this time with the pandemic still in place, the impact of this huge global event will no doubt find the sad situation of many unoccupied buildings once the full financial impact is felt. Therefore is it not sensible to wait and re-use these potential sites.</p> <p>Emotions run high and I could go on, but for now, this life long resident says NO, NO, NO and will give her full support to any campaign that brings the council to its senses.</p>	<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure</p>

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		<p>which will include a new community park linking Thatcham to the AONB.'</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Katie Beeson (lpr1356)	<p>I would like to strongly object to this proposed development.</p> <p>It would effectively join Upper Bucklebury with Thatcham, and alter our village beyond recognition.</p> <p>It is a massive over development of the Countryside.</p> <p>It will have a significant negative impact on traffic. The traffic in the village is bad enough already.</p> <p>It will significantly increase the noise and light pollution in Upper Bucklebury. At present we have no street lights and we can clearly see the stars on a clear night.</p> <p>It will put enormous pressure on Bucklebury common, other communal areas, and on the local wildlife. We need to protect and preserve our special local habitats and wildlife for future generations.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more</p>

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	<p>There will be significant issues concerning flooding if this large area of land is built on.</p> <p>This development would be sentencing those living nearby to 15 years of construction work with all the associated noise and inconvenience.</p> <p>This development is far too big, out of keeping with a post-covid world, and situated totally in the wrong place.</p>	<p>housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys</p>

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		<p>from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology</p>

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		<p>strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Louise Harry (lpr1358)	<p>I am writing to voice my <b>objections</b> to the proposed NE Thatcham development (Policy SP17). I am a resident of Upper Bucklebury, and have lived in the village with my family for 10 years.</p> <p>My objections are based on review of the consultation document plus supporting material, including:</p> <ul style="list-style-type: none"> <li>• Thatcham Strategic Growth Study 2019 (David Lock Associates)</li> <li>• West Berkshire Land Character Assessment 2019 (LUC)</li> <li>• Flooding in Thatcham 2008 (Sue Everett)</li> <li>• West Berkshire Environment Strategy 2020-2030</li> <li>• West Berkshire Local Plan Review to 2036 Sustainability Appraisal / Strategic Environmental Assessment 2019</li> <li>• Kennet Catchment Management Plan 2018</li> </ul> <p>As a result, I wish to <b>object</b> on the grounds of:</p> <p><b>Breaching of the Floral Way settlement boundary</b> Extending Thatcham to the north-east will continue to destroy the rural areas so highly prized by West Berkshire in all its planning material. In the LCA, the following detractors' (to the distinctly rural environment of the area) are described - each one of these will be made worse by this development:</p> <p><b>Decreasing separation/coalescence between settlements</b> <i>The expansion of Thatcham and Newbury since the mid-20th century, and also of villages within the character area, has reduced the physical and perceptual separation between settlements. This is particularly evident at the</i></p>	<p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.' The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement</p>



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	<p><i>western end of the character area, where there is near coalescence along the main connecting roads between Newbury and Thatcham, Cold Ash, Ashmore Green, Curridge and Hermitage.</i></p> <p><b>Increased suburbanisation</b> <i>Modern housing along main routes and on adjacent cul-de-sacs, together with street lighting and pavements, has introduced suburban characteristics to some places, particularly where there is less tree cover to mask changes e.g. the southern end of Cold Ash and linear development along the B4009 Long Lane just north of Shaw. Incremental development of the countryside settlements is also an issue, including the enlargement of curtilages, security lighting, entry gates etc.</i></p> <p><b>Loss of gradation between settlement and countryside</b> <i>Farm buildings and small pasture fields adjacent to settlements have proved vulnerable to development (typically of small residential clusters), due in the former case to presence of existing structures and in the latter to the screening/containment provided by boundary features. However, farm buildings, even when development has left them adjacent to settlement edges, contribute to rural character when they retain a relationship with farmland; and small enclosures, even when used as paddocks, form a transition between settlement and countryside that can contribute positively to landscape character, particularly when they retain a relationship with a historic settlement core.</i></p> <p><b>Increased traffic on the rural lane network the following detractors are already happen and will only get worse:</b> The Siege Cross planning rejection from 2015 references so many reasons for it being declined (beyond just not being part of a development plan). All of those reasons in point 3 (Landscape and Visual Character) still apply with the current proposal, and more so; the fact that the proposal has been included in the development plan does not suddenly mean those previous reasons for objection have been remedied. The rejection of that section follows the individual points of rejection by stating:</p>	<p>boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure</p>

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	<p><i>For the above reasons the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in terms of its location over the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development also fails to conserve the historic landscape setting and rural context of Siege Cross Farm.</i></p> <p>The settlement boundary is there for a reason, and West Berkshire highlighted many of those reasons very eloquently in rejection of the proposal.</p> <p><b>Increased risk of flooding and urban run-off</b> As stated in the LPR, appendix 4b: <i>There is a risk of surface water flooding with the site along the natural drainage routes based on EA modelling. The site is crossed by a number of ephemeral watercourses and these corridors would need to form part of a wider SuDs strategy to help manage the run-off from any new development.</i> All WBC supporting material speaks of mitigation measures, and yet the flooding in 2007 (regarded as a 1-in-200 year event, despite the EA assessment of it being a 1-in-169 years) seems to fall outside the planning horizon for risk planning; what hope can we have that these measures will be effective, especially given that <i>'the risk of flooding continues to escalate; making the events that shattered so many communities [in 2007] an ever increasing threat.'</i> (Pitt Review (2008))</p> <p>As the Flooding in Thatcham (2008) report states, 'the principal source of floodwater [in the 2007 floods] was run-off from farmland to the north of Thatcham.' In my recent conversation, with Sue Everett, author of the report, she remarked that it would be "utter madness to build on that slope" (referencing the designated area to the NE of Thatcham).</p> <p>Regarding the further effects of run-off, Sue Everett spoke of the dangerously high levels of phosphates and nitrates already impacting the Kennet Valley, and that development in NE Thatcham would add considerable urban run-off as the LPR states:</p>	<p>which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the</p>

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	<p><i>The Kennet and Avon Canal, south of the railway line, is a Site of Special Scientific Interest and development to the north would have to consider the water quality of any surface water discharged to the south.</i></p> <p><b>Impact on AONB through loss of separation from urban settlements and increase in traffic (pedestrian / cycle / automotive)</b></p> <p>As mentioned in (a), above, breaching the settlement boundary will have huge impacts on the AONB, both in terms of the rural character, and materially on the quality of life in those settlements adjoining THA20. Aside from the 'loss of greenfield land' (mentioned in the LPR, appendix 4), the LPR also states the 'site is of such a scale that it would provide new services and facilities that would be available to surrounding settlements like Cold Ash and Bucklebury', which clearly indicates the impact it will have, just from the point of view of facilities, potentially threatening the local shop, the local school etc., but also in terms of bringing Thatcham closer, adding traffic to local lanes (which have no pavements), and eroding still further the fragile commercial, cultural and environmental nature of the settlements within the AONB.</p> <p>As stated in DC1: <i>Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.</i></p> <p><b>Destruction of ancient forest land, fragile ecosystems (including AONB and SSSI, and land supporting protected species under European law), both through direct and adjacent loss of habitat, threatening biodiversity and general ecological well-being</b></p> <p>As the LPR states, the development site contains ancient woodland. According to the Government website:</p>	<p>corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan'</p>

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	<p><i>Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It's important for its:</i></p> <ul style="list-style-type: none"> <li>• <i>wildlife (which include rare and threatened species)</i></li> <li>• <i>soils</i></li> <li>• <i>recreational value</i></li> <li>• <i>cultural, historical and landscape value</i></li> </ul> <p>The LPR also states that the most recent TVERC study revealed there to be protected and priority species within the development area.</p> <p>If both of these factors aren't enough, the loss of greenfield habitat will drive species into adjacent (largely wooded and heathland) habitats, resulting in fragile ecosystems coming under further pressure (reduced space, resources etc.), upsetting the delicate balance of these ecosystems.</p> <p>This <u>will</u> result in a loss of biodiversity. Extend that still further to Bucklebury Common and its adjoining woodlands, a profoundly fragile environment already under pressure from illegal motor vehicle use, for example, and WBC / Developer assurances of a net gain in biodiversity do not have any credibility whatsoever. Proposals speak of much of the area being a designated '<i>Biodiversity Opportunity Area, part of the Bucklebury Plateau BOA, and the site is within a local habitat network.</i>' It goes on to state that this '<i>indicates that a net gain in biodiversity should be delivered through development.</i>' Improving biodiversity in the upper slopes of THA20 is not going to make up for the loss of habitat that construction of 2500 homes and its supporting infrastructure have on the rest of the proposed development area.</p> <p>By way of additional context, the country's habitat is under extreme pressure, and focusing on biodiversity without paying attention to abundance is neglectful:</p> <p>A 2019 New Scientist article (<a href="#">Thousands of UK wildlife and plant species are in decline</a>) includes the following:</p> <ul style="list-style-type: none"> <li>• <i>Of the species that we have more detailed data on, nearly 700 saw their numbers fall [since the 1970s] by 13 per cent. The declines</i></li> </ul>	<p>/ visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to be enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The</p>

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	<p>have left 15 per cent of species facing extinction, including the turtle dove, numbers of which are down 98 per cent in half a century.</p> <ul style="list-style-type: none"> <li>• “We have this pattern of ongoing loss, which is showing no slowing in the rate of decline. Overall, we are losing more species than we are gaining,” says Daniel Hayhow of the Royal Society for the Protection of Birds.</li> <li>• Hayhow calls [the decline in species numbers] a “canary in the coal mine signal” because changes in distribution usually happen much more slowly than changes in abundance.</li> </ul> <p>In a Dec 2019 paper, '<a href="#">Ongoing, but slowing, habitat loss in a rural landscape over 85 years</a>,' Ridding at al. make the following relevant observations, including the point that government performance on environmental management not only has a poor record, but is also guided by insufficient data:</p> <ul style="list-style-type: none"> <li>• <i>The National Planning Policy Framework sets out government's planning policies for England which requires that local authorities must ensure that any developments have minimal impact on biodiversity. Although the importance of protected areas for biological conservation is acknowledged, there is little empirical evidence of their effectiveness (Gaston et al. 2008; Greve et al. 2011).</i></li> <li>• <i>The findings [in this paper] illustrate a long history of habitat loss in the UK, and are important for planning landscape management and ameliorative actions, such as restoration. Our analysis also highlights the role of statutory protection in retaining semi-natural habitats, suggesting the need for continued protection of important habitats.</i></li> <li>• <i>many long-term [biodiversity] studies often focus on the last forty years at best.</i></li> </ul> <p>In other words, government and developer tendency to use biodiversity data from recent years masks the losses which have already occurred and gives us what can be referred to as "shifting baseline syndrome", through which there is an 'acceptance of the current low biodiversity state as being normal (Soga and Gaston 2018).'</p>	<p>biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>Housing provision must support the needs of the whole community, including the provision of both market and affordable housing, and reflect the needs of specific groups such as, but not limited to, families with children, single person households, the elderly, those households with specific needs, those wishing to build or commission their</p>

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	<p>On one recent walk along Cox's Lane, on the eastern edge of the proposed development area, numerous badger setts were noted, with entrances exposed to the lane itself. Aside from any lasting impact to such habitats once any residential or commercial development is established, the development work itself will dramatically alter the environment within which these animals, and their entire ecosystem, are living.</p> <p>The proposal's comment that '<i>Up to date ecological surveys will be required to determine detailed mitigation measures</i>' needs much more detail before it can be considered as having any merit.</p> <p>It is difficult for us to take WBC assurances of biodiversity seriously; there is so much documentation supporting these proposals and yet a recent TVERC analysis hasn't even been carried out, despite previous references to protected species. This does not inspire confidence in the priority of environmental protection, nor preservation of the overall rural context in which these species live.</p> <p>In addition to the points already made, the question of pollution (light, air, noise, water) needs to be addressed and barely seems to offer any acceptable outcomes - dark skies, a quiet environment (embodied by the network of quiet lanes in the Bucklebury parish), clean air (critical for our lichens and mosses, an important base layer in the ecosystem) and clean water are all impacted and will damage the AONB irreparably.</p> <p><b>Traffic congestion around NE Thatcham</b></p> <p>Thatcham's traffic issues are well-understood by any local resident, often leaving cars sitting in traffic queues along the A4 or at the level crossing for considerable lengths of time, hardly helping the council's carbon net-zero and healthy air ambitions. As the LPR states: <i>'Development would have a very significant impact on the local highway network.'</i></p> <p>The document then adds: <i>'Opportunities for modal shift should be maximised. A transport assessment would also be required.'</i></p> <p>Once again, we find the need for further analysis before this proposal can be considered as credible; it is hard to find any piece of data capable of</p>	<p>own home, gypsies, travellers and travelling showpeople and those seeking houseboat moorings. Developers will therefore need to consider housing mix in their proposals, including any local evidence of housing needs or evidence in Parish or Neighbourhood Plans which may be important considerations even for small sites, particularly in rural areas.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that "We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the</p>

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	<p>assuring anyone in the local community that adding 2500 homes into this area will do anything but cause huge disruption.</p> <p><b>Impact on an already-struggling local water supply</b> Water availability in the region is an issue, as the Kennet Management Plan (and my conversation with Sue Everett) makes clear. Additional development of this scale will only add to the depletion of resources.</p> <p><b>Failure to acknowledge housing needs based on household type, nor recognise the opportunities for commercial property re-use and town centre regeneration</b> SP12 (Approach to Housing Delivery) states: <i>Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.</i> In the most recent ONS household forecast data, which covers the period 2018 - 2028, the entirety of West Berkshire's housing growth is described as 2482, suggesting a 'necessary' annual figure (at least for the period covered) much lower than put forward in this proposal. Furthermore, regarding housing mix, the proposal (table 3 in SP12) shows that 60% - 70% of Market housing and 35% - 45% of Affordable housing will be 3 or 4 bedroom houses. ONS data shows that by far the highest growth in housing demand for West Berkshire will come from one-person households (10.7%, versus growth rates of -6%, -8.9% and -11.2% for families with 1, 2 or 3+ dependent children respectively). Given the housing mix suggested by the ONS forecast data, the proposal seems completely out of touch with the reality of local needs. In light of the changing nature of town centres, as retail moves on online, and an ageing population needing access to public transport, does it not make much more sense to repurpose unused commercial property for residential use, and in doing so change the declining nature of the high street, provide easier access to local facilities (especially for the ageing population) and reduce dependency on short car journeys clogging our streets and adding to the community's carbon footprint?</p>	<p>government's aspirations to have plans in place across the country by 2023.”</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Lack of meaningful and timely democratic engagement in the review process, and lack of thorough analysis of key elements of the proposal</b></p> <p>On my final point, I would say, very strongly, that there has been a significant lack of community engagement to date in the review process. Regardless of any efforts made by West Berkshire to make development proposals visible, they have been insufficient, particularly given the challenging macro-context in which we are all currently living. As a result, awareness is poor, general understanding of detail is worse and timescales have become unreasonably tight to make sense of all relevant material. If West Berkshire Council truly believes that '<i>everyone in West Berkshire has a role to play</i>' (Environment Strategy 2020-30) in helping West Berkshire become the model for a better, more environmentally-aware and sustainable community, surely this begins by ensuring broad levels of engagement from the whole community. Many people we have spoken with on this topic were unaware of it until very recently. Even the LPR (appendix 4) notes that there have been no comments from Midgham PC, despite their parish being directly impacted by the proposal. Add to this a lack of completed analyses throughout, on key matters such as flood prevention, water availability, environmental impact and traffic, and it is clear, despite all the assurances made by WBC and its consultants, that there is much that is very wrong with this proposal.</p>	
Jonathan Sayers (lpr1359)	<p>I am making a response to the proposed Local Plan to 2037.</p> <p>As a Thatcham resident on the southern side of the A4 at &lt;personal information removed&gt;, I am aghast at the plans for a staggering 2,500 new homes on the northern side of eastern Thatcham.</p> <p>This area and the appalling consequences this would have on residents elsewhere in Thatcham and surrounding villages mean that this is a wholly unsuitable area for housing development.</p> <p>I have lived here since 2004 and for the first seven of those years, I lived off &lt;personal information removed&gt;; it was a real delight to enjoy walking very</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity</p>



Respondent (with lpr ref)	Response	Council Response
	<p>regularly in the fields that are across the road. Nature is a precious gift we must cherish as a carbon sink and place of leisure and both physical and mental wellbeing.</p> <p>The countryside is beautiful here which is one the reasons I moved to West Berkshire; the air is cleaner than in most towns which MUST be a key priority; we must drive down air pollution and CO2 emissions if we are to defeat climate change and act as a responsible local authority in this goal.</p> <p>The lockdown has really taught people the value and joy of our countryside and this is not something that will be forgotten when the pandemic is over; it is a resource which rewards us with leisure and improved fitness as well as mental wellbeing. Well before lockdown, I still enjoyed walking in those very fields planned to be saturated with a colossal volume of new houses. It would be a tragic loss.</p> <p>A further and serious objection is an increased risk of flooding such a development would mean. I still vividly recall the terrible flood of July 2007 and the awful consequences southern Thatcham experienced. Whilst I know flood mitigation measures have now been made, this does NOT account for a colossal new concrete development on a hill which would gladly channel water back down across homes south of the A4. If the hills in the north of Thatcham did this last time when they were grassed fields, any further rains would have far more rapid and serious consequences when hitting homes and roads on a new development.</p> <p>I am also wholly unconvinced the supporting infrastructure for these homes is anything like adequate; it would mean a huge increase in local traffic on roads which can already be busy at rush hours and indeed through the day. I also know that there is no supporting plan for a railway road bridge so desperately needed in Thatcham even without any new homes; it is not unusual to spend at least 20 minutes at times waiting. This leads to huge traffic tailbacks and more polluted air as vehicles idle. New homes or not, WBC has sat on this issue for decades and continues to shelve it and or</p>	<p>and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning</p>

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	<p>ignore it. Thatcham's roads are also already in a poor state even as they are.</p> <p>The station is also rather poor; it has no facilities whatsoever; car parking is also poor and it has had little upgrades of any consequence for the town that Thatcham has grown to be. It was built for a village in the 19th century and it shows.</p> <p>Finally, there is the carbon damage these new homes would cause; at least 50 tonnes of carbon on average is created per new home. That's 125,000 tonnes of CO2 before anyone would so much as move in, let alone drive from them and use utilities. This is an appalling increase at a time when we need to reverse emissions, both of carbon and vehicle sources.</p> <p>Whilst there may be a need for an increase in homes in West Berkshire, Thatcham cannot have this many or in this location. It would be a blight that would wreck our town and cause very grave environmental damage. It must be resisted by WBC at all costs.</p>	<p>application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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Jonathan Harry	<p>I am writing to raise my objections to the proposed NE Thatcham development (Policy SP17). I am a resident of Upper Bucklebury, and have lived with my family in the village for more than 10 years.</p> <p>There are several areas that I feel particularly strongly about. These are –</p> <p><b>Increased risk of flooding and urban run-off</b></p> <p>As stated in the LPR, appendix 4b: <i>There is a risk of surface water flooding with the site along the natural drainage routes based on EA modelling. The site is crossed by a number of ephemeral watercourses and these corridors would need to form part of a wider SuDs strategy to help manage the run-off from any new development.</i></p> <p>All WBC supporting material speaks of mitigation measures, and yet the flooding in 2007 seems to fall outside the planning horizon for risk planning; what hope can we have that these measures will be effective, especially given that <i>'the risk of flooding continues to escalate; making the events that shattered so many communities [in 2007] an ever increasing threat.'</i> (Pitt Review (2008))</p> <p><b>Breaching of the Floral Way settlement boundary</b></p> <p>Extending Thatcham to the north-east will continue to destroy the rural areas so highly prized by West Berkshire in all its planning material</p> <p>The Siege Cross planning rejection from 2015 references so many reasons for it being declined (beyond just not being part of a development plan). All of those reasons in point 3 (Landscape and Visual Character) still apply with the current proposal, and more so; the fact that the proposal has been included in the development plan does not suddenly mean those previous reasons for objection have been remedied. The rejection of that section follows the individual points of rejection by stating:</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.' The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level</p>

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	<p><i>For the above reasons the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in terms of its location over the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development also fails to conserve the historic landscape setting and rural context of Siege Cross Farm.</i></p> <p>The settlement boundary is there for a reason, and West Berkshire highlighted many of those reasons very eloquently in rejection of the proposal.</p> <p><b>Increased traffic congestion in and around NE Thatcham</b></p> <p>Thatcham already has a congestion issue, particularly around the level crossing and access to the A4. This will significantly increase traffic and pollution. It will also increase traffic coming through Upper Bucklebury. It is already used as a 'rat run' to avoid the A4 and speeds are very often far higher than the 30 mph limit through the village. This development already runs counter to the council's ambition to be net zero, with traffic being a constant addition to this problem.</p> <p>As the LPR states: <i>'Development would have a very significant impact on the local highway network.'</i></p> <p>The document then adds: <i>'Opportunities for modal shift should be maximised. A transport assessment would also be required.'</i></p> <p><b>The changing requirements for dwellings in a post-covid environment</b></p> <p>No one is clear on what will happen in a post-covid environment and these plans do not take this into account. There could be a significant reduction in the demand for housing in this area. Even if there is not, the reduction in town centre retail outlets give a huge opportunity to re-purpose the buildings and create residential properties. As an example, both John Lewis and</p>	<p>study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing,</p>

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	<p>Debenhams department stores are not re—opening, providing modern and ideal multi-level sites that can be used for housing. There are also several brown field sites available for redevelopment.</p> <p><b>Impact on AONB through loss of separation from urban settlements and increase in traffic (pedestrian / cycle / automotive)</b></p> <p>As mentioned in (a), above, breaching the settlement boundary will have huge impacts on the AONB, both in terms of the rural character, and materially on the quality of life in those settlements adjoining THA20. Aside from the 'loss of greenfield land' (mentioned in the LPR, appendix 4), the LPR also states the 'site is of such a scale that it would provide new services and facilities that would be available to surrounding settlements like Cold Ash and Bucklebury', which clearly indicates the impact it will have, just from the point of view of facilities, potentially threatening the local shop, the local school etc., but also in terms of bringing Thatcham closer, adding traffic to local lanes (which have no pavements), and eroding still further the fragile commercial, cultural and environmental nature of the settlements within the AONB.</p> <p>As stated in DC1:</p> <ol style="list-style-type: none"> <li><i>1. Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety</i></li> </ol> <p>I cannot express the level of frustration at the lack of transparency and engagement with the residents about this proposal and I wholeheartedly oppose this development.</p>	<p>Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the</p>

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		parameters of the site, height parameters, green open space, etc.
<b>Landowners, site promoters and developers</b>		
Lichfields for North East Thatcham Consortium (lpr2391)	<p>Regarding Policy SP17, we strongly endorse the Council's positive approach to meeting West Berkshire's future needs including development at North East Thatcham of a strategic scale. This will help regenerate Thatcham and contribute towards meeting its infrastructure requirements.</p> <p>We are also broadly in agreement with the wording of Policy SP17, but suggest the below amends/clarifications would be beneficial:</p> <ol style="list-style-type: none"> <li>1 Clarify that the delivery of 40% affordable housing is across the entire site and not on a phase by phase basis;</li> <li>2 Not apply a prescriptive housing mix but rather have regard to overall need for housing in West Berkshire, local market need and demand, the character of the site and its surroundings;</li> <li>3 Ensure the appropriate proportion of dwellings to be delivered via serviced custom/self build plots is based on evidence of local need;</li> <li>4 Clarify specifically what is meant by a carbon neutral development in order to give certainty as to how this ambition can be pursued; and</li> <li>5 Acknowledge that additional PROW through the new strategic country park could be delivered, but linking them to the plateau and the AONB is outside of the boundary of the allocation site.</li> </ol> <p>We are broadly supportive of SA/SEA assessment of NET at Appendix 4 but make the below observations.</p> <ul style="list-style-type: none"> <li>• SA Objective 1: The assessment states that “A site of this size would be expected to deliver at least 3% of dwellings as serviced custom/self build plots.”</li> </ul> <p>As per the earlier comments in these representations we support the inclusion of custom/self build and do not necessarily disagree with the 3% figure but it will need to be evidenced.</p>	<p>Comments noted, the policy stipulates that affordable housing requirement for the site is 40%, it does not define that this will be achieved for each phase.</p> <p>In addition to ensuring that an appropriate amount of housing is provided in suitable locations, it is also important to ensure that there is a wide choice and mix of housing to meet existing and future local needs, and to help secure mixed and balanced communities. Any proposal will be considered against SP18 Housing Type and Mix which refers applicants and decision makers to use the most up to date evidence base on local housing need.</p> <p>In regards to the 3% self-build target this will be tested through the viability work into the LPR to ensure that it is a viable target. In terms of the inclusion of an element of self-build on the site, legislation places a duty on LPAs to:</p> <ul style="list-style-type: none"> <li>• have regard to the register when carrying out its planning, housing, land disposal and regeneration functions; and</li> <li>• grant, within three years, 'suitable development permission' to enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area.</li> </ul> <p>The policy will be amended to include the requirement for the development of the site to be supported by a Sustainability Charter which will establish how policy</p>

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	<ul style="list-style-type: none"> <li>• SA Objective 3: The assessment states that “<i>The developer would provide additional educational and training facilities and other facilities such as health facilities and local retail centres commensurate with development.</i>” Whilst this is the case and the NET scheme will provide for a range of infrastructure requirements, health facilities will need to be provided based on the CCG advising on there being a need.</li> <li>• SA Objective 6: The assessment highlights that on parts of the site (the area around Siege Cross Farm) with high risk of noise and vibration problems to future residents from road and commercial. Technical work to mitigate any noise or vibration issues for residents will be undertaken.</li> <li>• SA Objective 8: The assessment states that “<i>SP5 expects that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030. The site is of a scale that it will be expected to help with achieving this SA objective.</i>” Our representations concerning Policy SP5 address the definition of a carbon neutral development.</li> <li>• SA Objective 10: The assessment states that “<i>industrial development is proposed for a small portion of the site. This will help attract businesses and inward investment to the district.</i>” This appears to be an error and relates to the additional parcel of land promoted by Ptarmigan Land to the east of Colthrop Industrial Estate, not THA20 but MID5. On this basis the assessment marginally benefits from positive scoring associated with employment provision that does not strictly come forward pursuant to that allocation.</li> </ul> <p><b>Thatcham Strategic Growth Study (background study)</b> DLA has produced three reports as part of the Thatcham Strategic Growth Study. Overall, we support the broad thrust and approach of the DLA work and its conclusions in identifying that only growth of a strategic scale could support the service provision and regeneration that Thatcham requires, and demonstrating the suitability and deliverability of the NET site as a driver for the regeneration of Thatcham.</p>	<p>requirements will be achieved including an Energy Strategy to demonstrate how a low carbon development will be achieved.</p> <p>The policy will be amended to require a Public Rights of Way Strategy to demonstrate how existing Public Rights of Way will be protected and enhanced and how new ones will be established, including bridleway links and safe crossing points.</p> <p>The CCG are actively involved in the preparation of the IDP and a consultee as part of the Local Plan Review process and will advise on the requirements for medical provision.</p> <p>The Noise and Vibration Technical Assessment is noted.</p> <p>The query in regards to the additional parcel of land promoted by Ptarmigan Land to the east of Colthrop Industrial Estate, being included within the SA Assessment will be explored further.</p> <p>Comments on the Concept Plan and Thatcham Strategic Growth Plan are noted.</p> <p>The recommended changes to SP17 have been considered and response contained above.</p>



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	<p>The concluding 'Concept Plan' for the site provides a useful starting point illustration of how one might conceive the development of the site, whilst recognising that it identifies the need for flexibilities and the need to arrive at more specific conclusions on aspects of the scheme which require more technical work. For example, the pupil requirements/school provision will require more detailed discussions with the council, education authority and other stakeholders (such as the Kennet Academies Trust) to ensure NET contributes to meeting the education needs of Thatcham as a whole. Similarly, a flood attenuation strategy will also be drawn up for the whole site which may mean planned flood attenuation basins for the site can be redesigned within the masterplan in a different way. Once these and other more technical aspects of the scheme have been bottomed out, the precise form of masterplan can be arrived at, which will in due course shape a planning application for the site. This is likely to mean the concluded development is an evolution of the Concept Plan in the DLA work. For this reason, we do not highlight any detailed issues where we might arrive at a different conclusion on specific masterplanning aspects undertaken by DLA, being content that – overall – it performs its role satisfactorily in demonstrating the suitability and deliverability of the site as a prospective allocation.</p> <p>On this basis, as per our commentary under Policy SP17, we support the wording of this policy which allows some progression of the work done by the DLA by requiring the development to '<i>have regard, and positively respond</i>' the work.</p> <p><b>Site Selection Background Paper for the Emerging Draft LPR</b> This background paper is a very useful document in pulling together the key conclusions arising from the local plan evidence base and determining which sites should be included as allocations in the emerging local plan.</p> <p>With regards to Thatcham, the conclusions of the DLA masterplanning work comes through clearly in concluding on development sites in the town. It is clear that only growth of a strategic scale could support the service provision</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>and regeneration that Thatcham requires. The other sites considered in Table 8.2 of the report range from 36 to 225 dwellings (albeit site CA12 and its adjoining sites CA16 and CA17 combined would total 325 dwellings) compared to NET's 2,500 dwellings. The recurring conclusion on other development sites considered in Thatcham is that <i>"it is the Council's preferred approach to allocate site THA20 as a strategic site. Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037"</i>.</p> <p>With regards to the Thatcham allocation the reports do set out some areas of further investigation for NET including ensuring utilities are made available in a timely manner, highways and access, ecology, landscape and surface water flooding attenuation measures.</p> <p>These are all areas we are working on and will prepare more detailed material on for the progression of the local plan. In due course, this will give the inspector examining the plan confidence these issues have been considered and resolved at the time of the examination hearings.</p> <p>Changes:</p> <p><b>Policy SP17 North East Thatcham Strategic Site Allocation (amended policy)</b></p> <p>The site, as identified on the map, is allocated for a residential-led development comprising approximately 2,500 dwellings.</p> <p>A Mineral Resource Assessment (MRA) will be required to be provided for the site.</p> <p>The site will be delivered to achieve a sustainable, comprehensive and landscape-led development and ensure the timely and co-ordinated provision of infrastructure.</p> <p>The Council will be supportive of proposals which have regard, and positively respond, to the masterplanning work contained in the Thatcham Strategy Growth Study (2020).</p> <p>Development of the site will be expected to deliver:</p> <ul style="list-style-type: none"> <li>• <del>At least</del> Delivery of 40% affordable housing across the entire site, albeit the quantum may vary on a phase by phase basis</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• A housing mix which <del>complies with the housing mix contained in Table 4 of policy SP18 Housing type and mix</del> has regard to the overall need for housing in West Berkshire but also considers local market need and demand, the character of the site and its surroundings</li> <li>• At least 3% of A proportion of dwellings [currently 3%] to be delivered via serviced custom/self-build plots to meet evidenced local demand</li> <li>• <del>On-site renewable energy to assist in the delivery of a carbon neutral development</del></li> <li>• 2 new primary schools (1 x 3FE, 1 x 2FE) and the sports infrastructure requirements of those schools</li> <li>• A new secondary school (8FE) and the sports infrastructure requirements of that school</li> <li>• Surface water management approaches that could deliver net gain for Thatcham town</li> <li>• Biodiversity net gain <del>through</del> including habitat restoration and linkages</li> <li>• A network of green infrastructure which will include a new strategic country park <del>linking</del> enabling links from Thatcham to the plateau and the AONB through established Public Rights of Way</li> <li>• Local centres providing local retail facilities and small-scale employment space including potential enhancements to the Dunston Park Local Centre</li> <li>• Active travel improvements on routes between the site, town centre and railway station</li> <li>• Appropriate vehicular accesses and a through route</li> <li>• Sustainable transport through routes</li> </ul>	
JSA Architecture for the Colthrop Village Consortium (lpr774)	<p>The Colthrop Village Consortium consider that the proposed urban extension to North East Thatcham is flawed for the reasons set out in the letter prepared on their behalf by JSA Architects dated 4 February 2021 along with the associated Technical Note prepared by Stuart Michael Associates on Transport. That letter sets out the reasons fully and we ask the Local Planning Authority to take those comments into account as part of Consortium's comments on this draft Local Plan.</p> <p>Proposed change:</p>	Comments noted, and considered in the Council response table to SP13.

Respondent (with lpr ref)	Response	Council Response
	Recognise the constraints and inappropriateness of such a large incursion into the countryside. Consider the merits of the Rainsford Farm/former Colthrop Paper Mill site as sequentially preferable.	
Prosper Infinity Ltd. (lpr180)	<p>1. Avoid using greenbelt or undeveloped land where possible. 2. Suggesting a redevelopment site in Thatcham that is brownfield i.e. developed upon and entirely hardstanding and demonstrates it is in a sustainable location.</p> <p>Change proposed: Having also reviewed the current West Berkshire local plan (which includes the core strategy development plan and Housing site allocations plan), and the National Planning Policy Framework, I agree with the purpose of the LPR in achieving sustainable development that meets the needs of the present and future generations. I would like to focus my comments on the sections of the proposed development strategy in the spatial areas of Newbury and Thatcham. I would respectfully like to draw your attention to a brownfield parcel of land known as 'Newbury Leisure Park' which should be considered for redevelopment to assist in meeting the housing needs over the coming years. I enclose with these representations 2 title plans identifying the site which is in our ownership and control. The reason I would like to draw your attention to this parcel of land is because the site has exhausted its usefulness as a leisure facility. The current operator of the tenpin bowling centre has been struggling to make it a successful business over the last 2 and a half years, and is taking advice on dissolution processes. Prior to that, the previous 2 owners, namely MFA Bowl Ltd and Newbury Leisure Ltd also went into administration. As the owner of the land, I can prove that a financially stable and experienced leisure operator has been impossible to identify at each liquidation juncture when the previous three operators have failed to make this a profitable site over the last 8 years. The land is brownfield land (as confirmed by the Council in the Officer's report for application ref 09/01988/COMIND) and is available, deliverable and developable. I strongly feel that the site meets the strategic objectives of the LPR and has capacity for approximately 100 units of housing. It is sustainable being previously developed land on the edge of the settlement and historic an active destination in its own right, and by replacing</p>	<p>Comments noted, there is no green belt land within the District. In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>The site was not considered within the HELAA 2020 as it had not be submitted to the Local Authority. However, the site will be considered through the Review of the HELAA and is identified as THA21.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the leisure use with residential it would fit with the LPR strategy of focusing leisure uses in the Town Centres of Newbury and Thatcham and reusing previously developed land (in accordance with the NPPF). Additionally, the existing use demonstrates that it is a sustainable location which already uses existing transport and infrastructure. Policy SP1, SP3 and Policy SP17 suggests Thatcham will be a focus for regeneration. The LPR Policy SP3 also states '...the urban areas will be the prime focus for housing and economic redevelopment of suitable previously developed sites for housing purposes...'. Policy SP12 also states the approach to housing delivery uses the opportunity to use developed land. I would like to suggest that the council considers redevelopment of the land on Lower Way called Newbury Leisure Park where 4 of the 4.25 acres sits on either Flood Zone 1 or 2, and therefore a managed development within WBC guidelines would not pose a flood risk for residential dwellings. Indeed, given the site is presently almost entirely hardstanding and buildings, the redevelopment provides the opportunity for betterment in terms of flood management, landscaping and biodiversity net gain. Policy SP13 and particularly Policy SP17 suggests a number of large sites that are either green belt or undeveloped land at present. The Newbury Leisure Park site should be considered ahead of greenfield development given it is previously developed land in a sustainable location on the edge of the settlement (the settlement boundary runs along Lower Road, the site's northern boundary). I will make time to discuss this opportunity with the planning team in further detail should they have any additional questions. I admire the fact that the whole strategy of the LPR talks about West Berks focusing on previously developed land (PDL), and this parcel of land on Lower Way fits this description exactly. I look forward to hearing from the Planning Policy team.</p>	
Neville Baker Estate (lpr1275)	<p>We consider that the North East Thatcham strategic site allocation is unsound for the following reasons:</p> <ol style="list-style-type: none"> <li>1. By virtue of its scale, proximity and high visibility from several approaches to the AONB and the wider landscape, the proposed extension will have a significant harmful effect upon the setting, sense of remoteness, tranquillity and dark night skies of the North Wessex Downs AONB, contrary to Paragraph 172 of the NPPF and in conflict with Policy SP2 of the West Berkshire Local Plan Review 2020-2037: Emerging Draft (WBLPR).</li> </ol>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2. The proposed allocation is located on land forming part of the LCA WH4: Cold Ash Woodland and Heathland Mosaic landscape character area as defined in the West Berkshire Landscape Character Assessment (2019), which also includes land within the designated AONB. Accordingly, development of the type and scale proposed will result in an unacceptable loss of open countryside which is of high landscape value in its own right, contrary to Paragraph 170 of the NPPF and in conflict with Policy SP8 of the WBLPR.</p> <p>3. Paragraphs 1.26 and 2.24 of the Thatcham Growth Study (Stage 3) states that an objective of the Study is to avoid coalescence of settlements. However, the proposed development will significantly reduce the physical and perceived separation between Thatcham and Upper Bucklebury and an unacceptable loss of separate identity, contrary to the objectives of the Study and Paragraph 172 of the NPPF, and in conflict with Policies SP2 and SP8 of the WBLPR.</p> <p>4. The scale and proximity of proposed development, combined with the policy requirement for a network of green infrastructure linking Thatcham to the plateau and the AONB will result in an unacceptable increase in urban pressures on the environmental, economic and social fabric of the AONB, its communities and rural way of life, contrary to Section 87(2) of the Countryside and Rights of Way Act 2000, the North Wessex Downs Management Plan 2020 and Paragraphs 91 and 172 of the NPPF.</p> <p>5. The proposed development will have an unacceptable impact on the extensive areas of ancient woodland which adjoin the site, contrary to Paragraphs 170 and 175 of the NPPF and in conflict with WBLPR Policies SP11, DC4 and DC14.</p> <p>6. In combination, the proposed strategic allocations at Sandleford and North East Thatcham are expected to deliver approx. 2,250 dwellings by 2037. Therefore, the two strategic sites are a significant component of the urban focus of the Spatial Strategy and an even more significant component of the focus of development on the Newbury/Thatcham urban area. Accordingly, they are major contributors to the clear imbalance in the overall distribution of new housing development proposed between urban and rural areas, which is not justified by evidence and will have unacceptable consequences</p>	<p>the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a</p>

Respondent (with lpr ref)	Response	Council Response
	<p>for the AONB, particularly in relation to meeting local housing needs and maintaining vibrant and balanced communities.</p> <p>7. The expectation that the two strategic allocations will deliver approx. 2,250 dwellings by 2037 means that, District-wide, they will account for nearly 50% of all new dwellings to be delivered on allocated sites (in the WBLPR and NPD's) over the plan period (4,670 dwellings) and over 70% of all dwellings to be delivered on allocated sites in the Newbury/Thatcham urban area (3,105 dwellings). It is considered that this amounts to an undue reliance upon the two sites to deliver, which has considerable potential to undermine the Council's ability to meet the housing needs of the area and maintain a 5 year housing land supply over the plan period.</p>	<p>landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Green infrastructure is considered through policy SP10 Green Infrastructure.</p> <p>Ancient woodland is identified as an 'irreplaceable habitat' and is considered in policy SP11: Biodiversity and geodiversity and DC14 Trees, woodland and hedgerows.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of</p>

Respondent (with lpr ref)	Response	Council Response
		<p>medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p>



Respondent (with lpr ref)	Response	Council Response
<b>Other stakeholders (continued)</b>		
Christopher Beeson (lpr1361)	<p>I would like to strongly object to this proposed development.</p> <p>It would effectively join Upper Bucklebury with Thatcham, and alter our village beyond recognition.</p> <p>It is a massive over development of the Countryside.</p> <p>It will have a significant negative impact on traffic. The traffic in the village is bad enough already.</p> <p>It will significantly increase the noise and light pollution in Upper Bucklebury. At present we have no street lights and we can clearly see the stars on a clear night.</p> <p>It will put enormous pressure on Bucklebury common, other communal areas, and on the local wildlife. We need to protect and preserve our special local habitats and wildlife for future generations.</p> <p>There will be significant issues concerning flooding if this large area of land is built on.</p> <p>This development would be sentencing those living nearby to 15 years of construction work with all the associated noise and inconvenience.</p> <p>This development is far too big, out of keeping with a post-covid world, and situated totally in the wrong place.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process. Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is</p>

Respondent (with lpr ref)	Response	Council Response
		<p>not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). The updated version of the proposed allocation policy in the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Katie Gold (lpr1362)	<p>All I can say is NO!</p> <p>What an absolute joke, have you actually sat down and thought about what you are proposing?!</p> <p>It is completely Unfeasible, as it is the surrounding area at the moment is not properly cared for, with rats &amp; flooding &amp; far too much traffic coming through the residential areas.</p> <p>Anyhow, I could go on with a lot of pros &amp; cons and figures &amp; reasons but I am 100% certain you will have received many many of these already.</p> <p>So I will just say I am against this build , taking away all our wonderful countryside from the future generation, who are now all locked in suffering mental health from no interaction or schooling but are finding</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the outdoors &amp; fresh air about the only thing keeping them going from one day to the next .</p> <p>I cannot believe the people proposing this &amp; putting this through actually live in Thatcham, so outsiders please don't interfere with our town. I hope you can sleep at night.</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Nigel Rossiter (lpr1363)	<p>I must admit to being in two minds to this whole thing. The proposal is actually extremely well written, but is all in the positive</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and does not outline any possible issues - which is a very major criticism.</p> <p>Your response is good and extremely detailed. I might caution however against an inflammatory tone, despite how obviously angry you/we may be. It comes across very much as “Not in my back yard”. Antagonising people from the outset will not help. I do agree with 95% of all you have detailed. Your response also however has a few omissions and mistakes:</p> <ul style="list-style-type: none"> <li>- you have detailed concerns about flooding, but have not detailed concerns about water supply to Bucklebury. Today has been yet another example in my almost 20 year battle with Thames Water and the Harts Hill pumping station. We are reliant upon this and as we all know even with the new station and pumps it is inadequate - for those of us at the end of the line we rarely get pressures above 0.4 bar (the figure below which Thames Water are required to act and compensate.....). The new development plan makes no mention of how water supply will be achieved for all by Thames water if this development does go ahead.</li> <li>- you have mentioned the concern re schooling, particularly secondary schooling. The proposal does outline well a proposal for one new secondary school and at least three new primary schools. I would caution you to phase a concern re schooling with care and in line with the proposal report</li> <li>- the proposal mentions healthcare provision just once saying that present healthcare facilities are saturated, but makes no mention of how this new population may be cared for. This is a very major deficiency. 2500 new homes = ~ 10,000 new population = minimum 1 new GP practice with minimum 5 new full time GP partners and minimum 1 new NHS Dental practice. I have been negotiating with our GP practices who are aware of the proposal but are having issues with the local management based in Reading West to see the problem that</li> </ul>	<p>development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>will arise and fund new practices (plus all the PAMs - Professions Allied to Medicine: Dentistry, Physiotherapy, Social Services, Occupational Therapy etc etc).</p> <p>- the proposal makes some interesting assumptions on where the workforce will disperse to, if they travel. It highlights that up to 30% will head south towards Basingstoke and beyond. It correctly highlights that the present railway line marks a watershed but makes no comment beyond that. Better public transport links direct from Thatcham / Newbury direct with Tadley &amp; Aldermaston / AWE / Basingstoke / Winchester / Southampton / Portsmouth need to occur.</p> <p>- your assumption re work force planning post COVID-19 may actually be the exact opposite to that you have stated. There is now evidence that it is very likely that there will be a population drift away from big towns and cities towards rural areas. This recent pandemic has shown the workforce and business that physically being in the office and travelling into towns &amp; big cities is not absolutely necessary and many things can be done just as well, and often better, from home - it is certainly more cost effective. The demand for housing in our area is highly likely to increase significantly.</p> <p>If I was to agree with some of plan for 2500 new homes around the Thatcham area I can see many of the arguments for the current proposal. I do however struggle to agree with the third development area around Colthrop Manor and fail to see why the area around Henwick was discounted - the proposal does not go into enough detail about this.</p> <p>The reason that I am in two minds is precisely my point re population. Most of us have families. Most of our children who wish to stay in the area struggle to get onto the housing ladder locally as it is expensive and there is relatively little available. The area desperately needs good affordable housing for young people. Thatcham also</p>	

Respondent (with lpr ref)	Response	Council Response
	desperately needs better public services and amenities and will not get these without some cohesive (housing) plan.	
Charlotte Bradford (lpr1365)	<p>Dear planning - I can see plans for several houses in Thatcham Berkshire along A4 on green / fields.</p> <p>I have lived in the area all my life and now more than ever we need to encourage wildlife and trees.</p> <p>My main concern is before lockdown had to drive to Reading along A4 / M4 for my work and on occasion use the train station for access into London. The delay I had due to traffic volumes along Floral Way was a nightmare I use to leave my house in Dunstan Park to station almost 30mins. The fact that the level crossing has no bridge added to the stress of my journey.</p> <p>We simply don't have the infrastructure in place to support such a large volume of new builds. The schools, the doctors, the park's, the shops we don't even have enough shops.</p> <p>Please re consider this planning we cannot let the schools, NHS and environment suffer anymore.</p> <p>I don't know anyone who feels this would benefit the local community given the current state of C19 impact.</p> <p>We have seen closure of many shops in Newbury and yet no further shops or retail outlets have been opened in Thatcham or surrounding areas.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Andrew Peddie (lpr1365)	I am writing in my personal capacity (although for convenience from my work email, which I use for most purposes) to object on the following grounds to the proposals outlined for a major development on land to the North East of Thatcham in the following WBC documents, the 'Local Plan Review 2020 - 2037: Emerging Draft' and 'Thatcham Strategic	Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

Respondent (with lpr ref)	Response	Council Response
	<p>Growth Study Stage 3 Thatcham Future'. I understand at this stage that there is no planning application number for this proposal and so cannot quote one. I assume the above references are sufficient for identification purposes.</p> <p>As a resident near to Upper Bucklebury, I am alarmed at the erosion of peace and quiet enjoyment of a very special area of countryside that this development is likely to represent, if approved. It will have a major impact on the surrounding countryside including Bucklebury Common, given its proximity – we are already much troubled by off-road motor biking and 4x4 traffic and this is likely only to increase that sort of problem. The other impacts including increased traffic, burden on the existing services in Thatcham (which are already inadequate for its population) and general deterioration of a precious environment are also going to be significant. I cannot really believe that the continued spread of Thatcham is likely to be in the interests of anyone other than the developers in this scenario.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>



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		<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
<p>Chris Austin (lpr1365)</p>	<p>Following our attendance at two meetings held by members of Bucklebury Parish Council and having studied the content of the various related planning documents, we write to outline our objection to the development of 2,500 homes within the North Thatcham area.</p> <p><b>Environment</b> The proposed development abuts Bucklebury Common and an AONB.</p>	<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as</p>

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	<p>Residents of the new developments will be drawn to the Common and will significantly increase the pressures already faced by the eco systems and wildlife that feature there.</p> <p>Parking on and around the Common is already exceeding capacity, with verges being used during peak periods. Whilst the development is relatively close, not all residents will walk to the Common, they're likely to drive.</p> <p><b>Traffic</b></p> <p>Thatcham is already a bottleneck for traffic flowing through the town on the A4 between Newbury and Reading. By introducing a new road network with traffic calming, traffic lights and roundabouts, the impact on the flow of traffic will be significantly impacted.</p> <p>Reference is made to the close proximity of the potential development site, to Thatcham Railway Station. Whilst this may be true, the ability to get to the station during peak times is already near impossible by car. Whilst we appreciate an emphasis is made on sustainable travel, there is no requirement for residents within the development to embrace this, as a result cycle paths and pedestrian routes may be built, but in poor weather and dark winter months, residents will turn to their cars and further impact on an already congested road network.</p> <p>With congested roads in Thatcham, residents will seek out short cuts, this will undoubtedly introduce additional traffic to local roads and quiet lanes in Bucklebury. These roads are designed with layouts and speed limits to support local traffic only.</p> <p><b>Flood risk</b></p> <p>Recent flood alleviation works to the north of Thatcham have been built to protect the houses, businesses and infrastructure in the areas most severely affected by the 2007 flooding event. Whilst SUDS are being proposed within the development to manage the outflow of surface water, they are not designed to support the heavy volume of water from such a large-scale scheme. In addition to this, SUDS will release water into the relatively new flood management system and increase the risk of flooding within Thatcham</p>	<p>being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development</p>

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	<p>once again. Wildlife The impact on local eco systems and wildlife will be significant. Whilst plans identify mitigation actions and reference sustainable developments, it is abundantly clear that the development of farmland will destroy the spaces used and occupied by wildlife. The additional footfall on the Common will also impact on the wildlife.</p> <p><b>Pollution</b> The development will generate significant levels of light (even with dark sky lighting) it will upset the life of birds and mammals; they cannot adapt and will be driven from their habitats. This light pollution will also affect the residents of Bucklebury, spoiling their night sky. The volume of homes proposed will generate pollution from carbon emissions and those associated with population density. The clean air of the Common would be a thing of the past.</p> <p><b>Rail</b> Whilst Thatcham railway station is within a reasonable distance of the proposed development, there is little or no capacity for additional cars in the car parks or on-road parking. There is no reference to the improvement of infrastructure that is linked to the station, without this the already creaking system will be overwhelmed.</p> <p><b>Medical</b> Medical services in Thatcham, Bucklebury, Cold Ask and Chapel Row are all already under pressure. Whilst new services are included in the proposed scheme, there is no obligation for services to be provided prior to the completion of housing. As such, in the intervening period, new residents from the development will expect to join surgeries already at capacity. Thatcham remains a small town that is desperate for investment. By granting planning permission for this development, the local authority is devolving its responsibilities, by placing the need to provide services and infrastructure onto developers.</p>	<p>proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>

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	<p>Before West Berkshire Council considers further development in Thatcham, it must first demonstrate to existing residents its commitment to invest. Without this, WBC will continue to face strong opposition to applications that see the housing numbers increase significantly.</p>	
<p>Tim Hall (lpr652)</p>	<p>This is an unsustainable location.</p> <p>As this is unsustainable (it would, without any reasonable doubt, become an essentially car-dependent location) and especially with the declared Climate Emergency it could never be consistent with Council policy. Moreover it takes a beautiful and productive greenfield location and should not even be considered as an appropriate development location. Elsewhere I have suggested that fresh research and thinking is needed about retail and employment allocations and the potential elsewhere in built up and brownfield areas for housing.</p>	<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>
<p>Mrs Harvey (lpr1367)</p>	<p>I am writing to object and voice my concerns about the NE Thatcham development.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a</p>

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	<p>Living in Bucklebury, I am extremely concerned about the impact of building 2500 houses will have on the surrounding area. During and after completion.</p> <p>In my view this is excessive development in 'Rural Berkshire' and far too close to AONB.</p> <p>Not only will already oversubscribed local primary and secondary schools struggle. Hospitals and Dr surgeries will suffer.</p> <p>The traffic and pollution levels will increase. This will affect humans, domestic animals and wildlife.</p> <p>Over the years we have seen other developments appear in Thatcham Berkshire. There are certainly other sites available ones much more suitable to residential purposes. These would have a less negative impact to their area. Town and country.</p> <p>Thank you for acknowledgement of this objection</p>	<p>period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a</p>

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		<p>strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Ash Barratt (lpr1368)	<p>I'm writing to you to object on the proposed planning to build 2500 houses on green land.</p> <p>Firstly I'd like to highlight the roads, as the A4 is already an incredibly busy road. As a tradesman in the local area, at peak times I have</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the</p>

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	<p>waited over 10 minutes just to pull into the A4. All of the links leading into the town and onto Newbury are already chaos with too much traffic and the infrastructure isn't capable. Hambridge road has recently seen some maintenance and changes which has not worked in the slightest still cars backed up in every direction. Thatcham railway crossing is appalling, waiting times are too long with again cars backed up in every direction at all times of the day, it is absolute chaos.</p> <p>Now supposing these 2500 houses has 2 cars per house that will be potentially 5000 more cars on the road in an already overwhelmed area. This would hugely increase the pollution in the area as vehicles already spend most of their time not moving because of the poor traffic control around the town.</p> <p>Secondly the arable green land proposed to planning has been farmed for well over 100 years, my ancestors worked those fields some of which have already been taken by housing. The wildlife that lives in and around the area is incredibly vast, far too many to list. Taking those habits and areas from wild animals to roam would be crime against nature. Having houses that close to black lands would completely disrupt those animals and would be lost and never return. The homes alone will disrupt the wildlife not forgetting it would draw far too many extra people into black lands and would damage and disrupt the area of all the wildlife which would never return. The area is of outstanding natural beauty with breath-taking views across to the kingsclere downs, with 2500 houses those views would be lost. The area provides such a help for residents and walkers mental and physical well-being. I personally, when I'm having a tough time and my mental health falls I walk out there on the footpath to watch the wildlife and take in that familiar view to help myself recover, it's so important to people's wellbeing.</p> <p>Finally Thatcham has had too much development already. Any developments should only be on brown sites and unused land with existing boarders not extending boarders onto green fields, especially</p>	<p>A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

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	<p>one that backs onto areas of outstanding natural beauty and common land full of wildlife. I understand the need for housing, I wouldn't have a problem with a small portion of the proposed land being developed for possibly 100/200 homes along the roadside but 2500 in a small area like proposed is appalling. The infrastructure cannot cope as it is. The doctors and hospitals won't be able to cope, the schools won't be able to take in more students. The supermarkets and town centre is inundated, parking is already a huge problem.</p> <p>Thatcham and the surrounding area cannot take 2500 more homes. Far too much rural countryside has already been lost in this country.</p>	<p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Sarah Belcher (lpr1369)	<p>As a Thatcham resident I would like to register my strong objection to the proposed full development of the above sites for the following reasons;</p> <ol style="list-style-type: none"> <li>1. There has not been adequate communication of the consultation itself or the ability to object. WBC have not notified residents of Thatcham or Upper Bucklebury with any formal written notification. This should be allowed before consultation finishes and as such it should be extended to allow appropriate time for the residents of the affected areas including those using services such as doctors that would become oversubscribed.</li> <li>2. It is cited in both the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This development would clearly contradict that.</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the</p>



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	<p>This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</p> <p>3. The development would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”.</p> <p>WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <p>4. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. In light of the previous objection, what is the justification for WBC to now consider this, what has changed and knowing this has been refused once why have funds been spent already?</p> <p>5. It is an extreme over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it is allegedly the government driving this would they not be more open to changing some AONB status ?</p> <p>6. In the NWN the following statement is attributed to Hilary Cole.</p> <p>The council’s executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), said: “We are very keen to work with the local</p>	<p>existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that</p>

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	<p><i>community because it's such a big proposal and development for Thatcham. "We have taken a conscious decision to do this around Thatcham so it will deliver the infrastructure we need. "We feel that Thatcham is best placed to take a development of this size."</i></p> <p>I have two specific issues to object to on these statements made. Firstly WBC have done very little if any to work with local residents – see above points and secondly Ms Cole's statement infers that the decision is made, so why is so called consultation being held? Because of this she should resign and a comprehensive and unbiased consultation should be held.</p> <ol style="list-style-type: none"> <li>7. WBC and Thatcham councils have wasted a great deal of tax payers money in completing many surveys and writing an 800 page report, effectively making this a fait accompli, before going to consultation on the proposal.</li> <li>8. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</li> <li>9. This will significantly impact the freight traffic using the industry site at Thatcham</li> <li>10. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</li> <li>11. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</li> <li>12. It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</li> <li>13. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this</li> </ol>	<p>development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a</p>

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	<p>size. The shop is also likely to suffer as the plan indicate that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</p> <p>14. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), the proposed development site is extremely hilly land which is almost certainly as unsuitable to development as the flood plain. As each development plan is put forward for this side of Thatcham concerns over flood plain impact are raised. Has a study been done on the overall impact of all off the current developments when combined? The works to add flood defence for Thatcham will be sure to be inadequate if more water is sent into the town due to more open land being built on.</p> <p>15. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury. And in addition will impact the light pollution, dust and noise for the residents of Dunston Park in both the short and longer term.</p> <p>16. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>17. The Loss of the only safe way to walk into and out of Upper Bucklebury from Thatcham will essentially force an increase of traffic on the village road Harts Hill Road. It will also make it impossible for those villagers who are elderly and do not drive to make their way into Thatcham safely by foot as the lower part of the road is an unsafe option with blind bends.</p> <p>18. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. When would this be built before or after</p>	<p>development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet</p>

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	<p>the houses? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p> <p>19. What impact will Brexit have on new residents to the area in that we have a large proportion of EU citizens already here, but this is likely to continue in future hence is the demand for housing still appropriate. ONS statistics show that in 2019 29% of mothers of babies born were not from the UK. Does there need for such extensive development?</p> <p>20. West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC%20Environmental%20Strategy%20Summary%20A4%20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC Environmental Strategy Summary A4 20.pdf?m=637141844400230000</a>WBC - Environment Strategy - <b>with declaration of climate emergency</b>. This development will contribute with the increased pollution from the construction traffic, increased vehicle pollution due to the inevitable congestion and further pollution from the residences once in use.</p> <p>21. The plan suggest the provision of a “country park”. There is no budget available for this.</p> <p>22. There would be a huge impact on the already oversubscribed doctor’s surgeries within Thatcham, and the proposed development would only mean more strain on those stretched resources.</p> <p>23. There would be a huge stretch on already over busy retail stores within both Thatcham and Newbury. The pandemic has highlighted issues which already existed. The car parks in Newbury town centre are inadequate during busy times for the current residents without adding the proposed number of</p>	<p>the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a</p>

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	<p>houses and subsequent footfall increase. This would only introduce greater risk for transfer of any viruses in the future.</p> <p>24. The supermarkets and Retail Park struggle to manage current footfall at busy times weekends, public holidays, Christmas. Adding 2500 homes and subsequent population increase is not going to help this. And using up further land to build more supermarkets is not a solution either.</p>	<p>landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Will McAree (lpr1370)	Further to the public consultation on WBC Local Plan Review 2020-2037 Emerging Draft, specifically the proposal to develop 2500 houses in North East Thatcham. As a resident in Upper Bucklebury I wanted to	Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

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	<p>share my concerns on the impact of the development on the local area and community.</p> <p>My family and I have chosen to live in a rural community of Upper Bucklebury and the proposed development will surely lead to a loss of the rural community 'feel' due to Upper Bucklebury being connected to the greater urban area of Thatcham.</p> <p>The proposed development would be lead to significant loss of the 'green' land and consequently loss of precious ecosystems. With the high number of dwellings proposed the consequential need for further additional buildings and amenities to support such a significant increase in the local population, further increasing the required volume of 'green' land to be developed.</p> <p>The proposed number of dwellings and consequential increase in the local population will increase traffic through the surrounding areas including Upper Bucklebury. Recognising the A4 is main road that will be used by a proportion of the community, as soon as the A4 becomes congested, as it regularly does drivers will use quieter, rural roads to make timely progress with their journeys (this is already clearly evident). Our concern with increased traffic through the village is the safety of other road/pavement users such as our children as they make their way to school or enjoy their village (in parts of Upper Bucklebury there are no pavements and we need to use roads to move about our village). Despite roads being identified as 'quiet lanes' there are regular instances of vehicles exceeding the speed limit.</p> <p>Understandably there will also be increased demand to explore the local common areas further increasing road users and demand for parking. It's likely a higher number of visitors would also impact the fragile ecosystems in the surrounding countryside with a long history that should be preserved for future generations to enjoy.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>

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	<p>I assume the development would ensure appropriate upgrading of amenities, not only for the new development but not to the detriment of Upper Bucklebury (we already regularly experience issues with water supply).</p> <p>I do acknowledge the need for new housing but this proposal will significantly impact the rural community and surrounding country side of Upper Bucklebury and urge WBC to reconsider the proposal.</p>	<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Elizabeth Weedon (lpr1375)	<p>As a resident of &lt;personal information removed&gt;in Upper Bucklebury I would like to strongly register my OBJECTION to the proposed full development of the above sites for the following reasons.</p> <ol style="list-style-type: none"> <li>1. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> <li>2. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating "particularly as development of both north east and north Thatcham would result in the loss of the separate identities of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern".</li> <li>3. A previous application was rejected by the Secretary of State in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-</a></li> </ol>	<p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.' The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site</p>

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	<p><a href="#">down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far?</p> <ol style="list-style-type: none"> <li>4. It is a massive over development of the countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West Berkshire is AONB. WBC has previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</li> <li>5. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption. <ol style="list-style-type: none"> <li>1. This will significantly impact the freight traffic using the industry site at Thatcham</li> <li>2. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</li> </ol> </li> <li>6. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation. Traffic in Upper Bucklebury increases considerably each time there is disruption on the A4 and the development will significantly increase traffic, especially during the morning rush hour as pupils from the village walk to school.</li> <li>7. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain. Why build on an area where flood alleviation has already been installed to protect Thatcham residents?</li> <li>8. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper</li> </ol>	<p>as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s</p>



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	<p>Bucklebury. There will also be decades of disruption through the construction phase.</p> <p>9. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>10. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. Will these be built before or after the houses? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p>	<p>Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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		<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>
Barry Dickens (lpr1376)	<p>Dear Sir or Madam, I wish to object to the proposed development in NE Thatcham for 2500 houses for the following reasons:</p> <p>The housing supply need in the Emerging Draft of the Local Plan is based on outdated information</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p>

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	<p>It will merge Thatcham into Upper Bucklebury and close the 'strategic gap' between the two. This scheme will breach the settlement boundary of Thatcham defined by Floral Way.</p> <p>Increased traffic predictions are way off the mark and traffic will adversely affect Bucklebury far more than predicted.</p> <p>The setting of the AONB will be harmed.</p> <p>The development will result in increased light, noise and air pollution.</p> <p>This plan needs urgent reconsideration</p>	<p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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		<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Burdwood Surgery (lpr1378)	<p>Whilst we understand the need to develop new homes in our area, we recognise it will have huge impacts and would like to be involved in shaping the plans with respect to the impact on health and well-being.</p> <p>You will no doubt be aware that we were originally a practice built to serve 8,000 patients and now accommodating 10,500 and that there is a workforce crisis in primary care for both nurses and doctors, both locally and nationally.</p> <p>We would like to understand the impact to us as a surgery and what that means to our patients. We endeavour to maintain high quality primary care services to our patients and work hard to maintain that. Any population growth tends to affect everyone regardless of where the house are actually being built.</p> <p>We would like it to be noted that we would like you to take into consideration and have an open dialogue with us and the other primary care providers in the locality at the earliest point in any development, so we can have a joined-up approach.</p>	<p>Comments noted, and the Council acknowledge and welcome joint working and collaboration with service providers such as the doctor's surgery.</p>

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Maureen Bowden (lpr1380)	<p>I would like to register my objection to the proposed development of farmland for 2,500 houses between the A4 Thatcham and Upper Bucklebury.</p> <p>I am a resident of Upper Bucklebury, and have been all my life. Whilst the housing in Thatcham continues to increase at a rapid pace, the development of the infrastructure remains static, and it is already inadequate. More and more the main road through Upper Bucklebury is used as a “rat run” between Thatcham and Reading, the congestion around the railway bridge is terrible and whilst I appreciate the demand for housing is high, surely a new development the size of Hungerford in this location is unsustainable and severely detrimental to local residents.</p> <p>Whilst these "glowing plans" for this area of development to become so enormous and perfectly sustained by amazing new facilities, the loss over the last 10 years of local children’s services, youth services and those for the elderly, difficulties obtaining GP appointments (even pre Covid) the neglected condition of our roads, how on earth can be considered. Surely until the pandemic is behind us and its effects are fully known, this is not the time for such a ridiculous number of houses to be planned alongside our already stretched resources.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
Laura Sparks (lpr1368)	<p>My objection to these new homes are as follows-</p> <p>It’s too many houses in one area.</p> <ol style="list-style-type: none"> <li>1. Not enough school places, already stretched.</li> <li>2. Doctors surgeries over stretched</li> </ol>	<p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location</p>

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	<ol style="list-style-type: none"> <li>3. Roads already too busy.</li> <li>4. Shopping centre in Thatcham not big enough.</li> </ol> <p>I understand new homes need to be built and that the area proposed isn't a footpath but consideration must be paid to infrastructure, schools in particular do not have enough spaces and this worries me greatly.</p>	<p>to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Jessica Brown (lpr1369)	<ol style="list-style-type: none"> <li>1. Bucklebury has always been a small village with a close knit community and adding houses would take away the small caring manner of the village and make it feel like more of a town where nobody cares for one another. It would be a huge over development for such a small community. There is not enough space in local doctors surgeries, dentists etc to allocate for this many extra households. We have to already wait weeks on end to get appointments.</li> <li>2. Pollution levels will increase dramatically in the area. Light pollution will increase and that is not fair on all of the individuals in the area trying to preserve our resources.</li> <li>3. We would lose an excruciating amount of the country side. For years myself and my family have lived in Bucklebury and we often spend evenings in the summer having picnics and enjoying this countryside. My grandfather tells us many stories about the land and how himself and my great grandparents grew up there.</li> <li>4. We have been trying to preserve the wildlife as a community and the wildlife has really started to thrive! It would be an awful shame to destroy the hard work and all of the wildlife that has to the area.</li> <li>5. The amount of traffic this development will create will have a massive strain on the roads and journeys will take twice as long</li> </ol>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement</p>



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	<p>as they do already. The roads are already busy enough and there are plenty of potholes and the roads will not cope with more traffic. Please please DO NOT let this development go ahead</p> <p>For the planning application to be denied and to leave the land as it is and how it should be!</p>	<p>development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there</p>

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		<p>would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
<p>Thatcham Medical Practice (lpr1382)</p>	<p>I would like to reiterate what, the Practice Manager from The Burdwood Surgery has stated and our concerns for the very large development that is planned to happen on the east side of Thatcham.</p> <p>Medical services in Thatcham are presently over stretched and we are no different from The Burdwood practice. We are a larger practice of over 18,500 patients and recently our patient list has been growing again.</p> <p>I think it is extremely important that at an early stage the Planning Team are fully aware of local medical services and the present pressure they are under. They need to understand what a large development like this</p>	<p>Comments noted, and the Council acknowledge and welcome joint working and collaboration with service providers such as the doctor's surgery.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>will mean to the pressure of local medical practices and we would like this to be taken into consideration.</p> <p>I think it will be extremely important that the planning team will need to look at assisting with extra development resources which will allow the medical services in the local area to help manage any increase in population size.</p> <p>If consideration of medical services cannot be guaranteed, then I think strong objections to this development on the grounds of danger to health of the local population.</p>	
Caroline Clothier (lpr1439)	<p>My letter regarding this development is neither a full objection nor full approval.</p> <p>I live in Upper Bucklebury and have some concerns about the proposed development.</p> <p>Whilst I fully accept the need for the council to build new homes to meet the government quota for West Berkshire there are some issues I would like to raise.</p> <p>Firstly, and my major concern, is the increase in traffic using the road through Upper Bucklebury. Having looked at the information available for this development the traffic study appears to have little detail to back up broad based 'estimates' of how much extra traffic will indeed use Harts Hill Road and Broad Lane and the effect this will have in the village. In order to maintain the rural nature of the village I would not be in favour of any road widening schemes, if that were even possible, to alleviate traffic along Broad Lane.</p> <p>My second concern is an environmental one looking at the land that is proposed to be used. It is close to organic farmland and the AONB and</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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	<p>I would want to see a full, independent, environmental study on the impact on flora and fauna of the area.</p> <p>Thirdly, I am aware of the new flood defences that have been put in place both near Henwick and just north of Floral Way. There is little current housing built on the hillside and already we know there have been significant flooding events in the last 15 years which the defences are designed to avoid in the future. By effectively removing the draining effect of vast tracts of open land I am concerned this will, once again, increase the flood risk in Thatcham. ( where my son and his family live) I would like to see a full risk assessment done on this issue and for the plans to include full information for the new flood defences that would be required.</p> <p>My overall conclusions lead me to sum up my current thoughts as whilst I accept the need for more homes, especially affordable homes, this proposed development feels too large for both the town and the land available in order to seriously consider my main points above. Therefore I do object to the current proposal but am hoping for an opportunity to approve an amended smaller plan.</p> <p>I understand that the development needs to be a certain size to trigger the infrastructure being put in by the developer but I would like WBC to investigate reducing the number of homes sufficient to retain important infrastructure without losing the character of both Thatcham and the open countryside that forms the border between the town and the AONB.</p> <p>Thank you for the time and consideration you put into this and other planning decisions for West Berkshire.</p>	<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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		<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Lorraine Jordens (lpr1438)	<p>I would like to formally register my objection to the proposed development of 2500 houses at NE Thatcham for the following reasons:</p> <ol style="list-style-type: none"> <li>1. It will dramatically reduce the greenbelt between Thatcham, Cold Ash and Upper Bucklebury.</li> <li>2. The rural nature of this area would be completely lost with Upper Bucklebury, Cold Ash becoming part of Thatcham.</li> <li>3. It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If developments of this scale are approved there will not be any open rural areas left for future generations to enjoy.</li> </ol>	<p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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	<p>4. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain area. I live next to the new flood defence. This morning I took photos of the lack of maintenance on this sight. There are leaves, old plastic containers and sand blocking many of the new barriers. When this flood defence was built WBS admitted partial liability for the damage to our houses during the construction. How much more damage and liability will be incurred with this proposed development?</p> <p>5. The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and ill-conceived.</p> <p>6. This development will have a significant impact on traffic levels and the associated pollution throughout the area, especially increasing:</p> <ol style="list-style-type: none"> <li>1. Traffic and speeding on Harts Hill Road is currently an area of great concern. We are sometimes unable to turn into Harts Hill Road in rush hour due to the amount of traffic.</li> <li>2. Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.</li> <li>3. Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested at busy times and in the event of any minor traffic disruption.</li> </ol> <p>7. It will significantly increase the noise and light pollution to the Dunstan Park and those in the surrounding areas. I live next to the new flood defence and from the cutting of the trees the noise levels have increased significantly.</p>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for</p>

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	<p>8. There is no evidence that this development will enhance Thatcham town centre (or the area in general).</p> <p>9. It is not likely to attract new businesses to the area or create or significantly increase employment. Please just look at the empty retail units and The Mill House Pub which is now just an eye sore.</p> <p>10. The amount of wildlife habit that was destroyed in the construction of the flood defence was appalling, what will be the impact on if this proposed development went ahead? I personally witnessed dead fox cubs and rabbits on Floral Way, Monkjack running around Bradley Moore Square in daylight. Then there was the destruction of hedgerows with the habit associated with them. WBS admitted there were doormice which is endangered and still none of the wildlife planting which was promised has gone ahead. I doubt whether building companies will look at this destruction as it appears wildlife and natural vegetation is not high on their agenda.</p> <p>11. This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are already overstretched.</p> <p><b>To conclude this development is unnecessary, inappropriate and ill-conceived and should be rejected.</b></p> <p><b>Observations</b></p> <p>1. Awareness of this development/application/consultation was provided by the local community and not WBC. Furthermore, it is not clear at what stage this application has now reached.</p>	<p>both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely</p>

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	<ol style="list-style-type: none"> <li>2. Why is WBC not writing to all residents to make them aware of this development and encourage/seek comments on the proposal from as wider audience as possible?</li> <li>3. Taking into consideration the scale of this development there has been a distinct absence of communication which is extremely disappointing.</li> <li>4. As a local resident I find the comment by Councillor Hilary Cole reported in the Newbury Weekly News that <i>“We are very keen to work with the local community...”</i> a pleasant surprise and I would be interested to know when it is going to commence.</li> <li>5. Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and surrounding villages. The consideration of this approval now certainly seems to totally contradict this stated commitment.</li> <li>6. Finally, why is WBC are now considering this development when a previous application was rejected by the secretary of state in 2017?</li> </ol>	<p>infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p>



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		<p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>
Ian Clothier (lpr1437)	<p>&gt; I would like to raise my objection to this proposed development on the grounds that it is too large for the area.</p> <p>&gt; I live in Upper Bucklebury and have the following concerns about the proposed development.</p> <p>&gt; Whilst I fully accept the need for the council to build new homes to meet the government quota for West Berkshire there are some issues I would like to raise.</p> <p>&gt; Firstly, and my major concern, is the increase in traffic using the road through Upper Bucklebury. Having looked at the information available for this development the traffic study appears to have little detail to back up broad based ‘estimates’ of how much extra traffic will indeed use Harts Hill Road and Broad Lane and the effect this will have in the village. In order to maintain the rural nature of the village I would not be in favour of any road widening schemes, if that were even possible, to alleviate traffic along Broad Lane.</p> <p>&gt; My second concern is an environmental one looking at the land that is proposed to be used. It is close to organic farmland and the AONB and I would want to see a full, independent, environmental study on the impact on flora and fauna of the area.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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	<p>&gt; Thirdly, I am aware of the new flood defences that have been put in place both near Henwick and just north of Floral Way. There is little current housing built on the hillside and already we know there have been significant flooding events in the last 15 years which the defences are designed to avoid in the future. By effectively removing the draining effect of vast tracts of open land I am concerned this will, once again, increase the flood risk in Thatcham. ( where my son and his family live) I would like to see a full risk assessment done on this issue and for the plans to include full information for the new flood defences that would be required.</p> <p>&gt; My overall conclusions lead me to sum up my current thoughts as whilst I accept the need for more homes, especially affordable homes, this proposed development feels too large for both the town and the land available in order to seriously consider my main points above.</p> <p>&gt; I do understand that the development needs to be a certain size to trigger the infrastructure being put in by the developer but I would like WBC to investigate reducing the number of homes sufficient to retain important infrastructure without losing the character of both Thatcham and the open countryside that forms the border between the town and the AONB.</p> <p>&gt; Thank you for the time and consideration you put into this and other planning decisions for West Berkshire.</p> <p>I would like WBC to investigate reducing the number of homes sufficient to retain important infrastructure without losing the character of both Thatcham and the open countryside that forms the border between the town and the AONB.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy</p>

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		<p>which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>
Ann Mapham (lpr1436)	<p>The Bucklebury Parish Council has produced a 15 page Report which comments on the West Berkshire Council's NE Thatcham Development plan. The Report is thorough and responsible and I would like to support this excellent Report.</p> <p>Essentially, the BPC Report highlights many discrepancies between the WBC's mandate, (the guidelines and principles to be adhered to, when housing developments are planned in West Berkshire and in the UK generally) and the way in which the Plan fails to adhere to these principles.</p> <p>There is an urgent need to go back to the drawing board:</p> <ul style="list-style-type: none"> <li>• Most importantly in my view, is the crucial need to appreciate that proposing an area of high density housing which would link Thatcham with Bucklebury is in direct opposition to the expressed principle that values the "local distinctiveness of the area". As the BPC report says: <i>There is a "Strategic Gap: A tenet of past planning in West Berks has been the maintenance of strategic gaps to separate communities. Until this proposal was tabled, the land north of Floral Way has provided the gap</i></li> </ul>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs</p>

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	<p><i>between Thatcham and Bucklebury. The proposal all but eliminates the separation and will visually and socially break natural community boundaries. Breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past. It is incomprehensible that its loss is now proposed."</i></p> <ul style="list-style-type: none"> <li>• A recalculation of the number of houses needed in Thatcham is essential - the BPC report makes strong arguments pointing out that 2500 houses is <u>way in excess</u> of the number that will be required.</li> <li>• Explore other options for housing - for example repurposing empty buildings (John Lewis and Debenhams shopping space in Newbury). Consider two or three storey buildings which would lower the footprint of a housing settlement.</li> <li>• Explore other areas which don't involve the loss of or future damage to pristine countryside.</li> <li>• Reassess and fully appreciate the damage to Bucklebury Common which would inevitably result from the enormous increase in pressure of the proposed 10 000 more people in close proximity to the area. Bucklebury Common is an ancient and priceless national treasure. To deliberately propose housing in the region of 10 000 people close by, is gravely counter the WBC instruction which explicitly states - "<i>The degree of protection will be proportionate to the status of the site in terms of its international, national and/or local importance;</i>" See below</li> <li>• Study more thoroughly the traffic flow that would result from the proposed development and the enormous problems and everyday frustrations that would be experienced by the existing community.</li> <li>• Appreciate the air and light pollution problems that would be experienced by the residents of Bucklebury - accurately described in the BPC Report.</li> <li>• Provide clarification in regard to who the beneficiaries of this development are and weigh that up with the cost to the existing community in terms of quality of life - access to schools, health</li> </ul>	<p>assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>care, daily experience of traffic and transport, population pressure, access to pristine nature.</p> <p>Thus the BPC Report highlights principles which guide the West Berkshire Council and it points out in detail how this development contravenes its mandate. I urge those concerned with the planning to consider <i>all the points</i> made in the BPC Report. I urge them to respect the powerful arguments it puts forward and go back to the drawing board.</p> <ul style="list-style-type: none"> <li>• A recalculation of the number of houses needed in Thatcham is essential - the BPC report makes strong arguments pointing out that 2500 houses is <u>way in excess</u> of the number that will be required.</li> <li>• Explore other options for housing - for example repurposing empty buildings (John Lewis and Debenhams shopping space in Newbury). Consider two or three storey buildings which would lower the footprint of a housing settlement.</li> <li>• Explore other areas which don't involve the loss of or future damage to pristine countryside.</li> <li>• Reassess and fully appreciate the damage to Bucklebury Common which would inevitably result from the enormous increase in pressure of the proposed 10 000 more people in close proximity to the area. Bucklebury Common is an ancient and priceless national treasure. To deliberately propose housing in the region of 10 000 people close by, is gravely counter the WBC instruction which explicitly states - "<i>The degree of protection will be proportionate to the status of the site in terms of its international, national and/or local importance;</i>" See below</li> <li>• Study more thoroughly the traffic flow that would result from the proposed development and the enormous problems and everyday frustrations that would be experienced by the existing community.</li> </ul>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>

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	<ul style="list-style-type: none"> <li>• Appreciate the air and light pollution problems that would be experienced by the residents of Bucklebury - accurately described in the BPC Report.</li> <li>• Provide clarification in regard to who the beneficiaries of this development are and weigh that up with the cost to the existing community in terms of quality of life - access to schools, health care, daily experience of traffic and transport, population pressure, access to pristine nature.</li> </ul>	<p>packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Through the Local Plan Review the Council will ensure that the allocations and policies will deliver sustainable development and will be tested through the Sustainability Appraisal and examination.</p>
Allison Butcher	<ol style="list-style-type: none"> <li>1. SP 13, in Chapter 6, introduces <b>NE Thatcham (SP 17), and the development of 2500 houses</b>. Such a disproportionately large development will have an unacceptable impact on a town the size of Thatcham and on the surrounding rural area and villages. I agree with the findings of the BPC that the housing demand analysis is flawed, and that the effects of the Covid-19 pandemic in relation to the proposed housing needs have not been taken into consideration.</li> </ol>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to</p>

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	<p>2. <b>Upper Bucklebury and adjoining parishes will be subsumed into the ‘NE Thatcham’ area</b>; the development will go well beyond the clear town boundary of Floral Way, eliminating the ‘strategic gap’ between Thatcham and the villages; the development will reach up to the North Wessex Downs AONB and Bucklebury Common; there is no commitment to a boundary to prevent further spread or development of the site.</p> <p>3. <b>The negative impacts on the AONB and Bucklebury Common</b> will be considerable and of long duration for the many and detailed reasons noted in the BPC response. These impacts are unacceptable for future generations. I support the arguments and recommendations by the BPC and parishioners on the inclusion of specific objectives in the LPR on Nature.</p> <p>4. The number of houses proposed will inevitably increase <b>the weight of traffic</b> through Thatcham and the rural communities to the north of the development. The hill leading to Upper Bucklebury is notoriously dangerous. Many vehicles already use this route up to and through the villages in order to avoid traffic at peak times on the A4. Speeding, as WBC is already aware, is an issue of grave concern on these roads; the additional number of car journeys generated by the proposed development would exacerbate this problem to yet more dangerous levels for local residents. The quality of life for residents would also be severely affected by the increased levels of traffic and the associated pollution.</p> <p>5. Apart from the pollution caused by additional traffic, the housing development itself will also result in <b>increased levels of pollution</b>. The rural communities and the Common will be adversely affected by the increased carbon generation. Light pollution will affect the population of Bucklebury parish and, as noted by BPC, will upset the life of birds and mammals. Noise pollution, both during the extended proposed building period and beyond, will be considerable and disruptive.</p>	<p>accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>



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	<p>6. <b>The infrastructure for Thatcham</b>, in areas such as the development of the town centre, the additional health care needs, and the impact on the level crossing and parking at Thatcham Railway Station, <b>has not been addressed</b> in the light of this additional large housing development. All of these matters will have a negative effect, in their turn, on the surrounding rural areas.</p> <p>SP17 : to be removed from the West Berkshire Local Plan Review</p> <p>Consultation with all stakeholders on changes and improvements to the LPR, with a fair and realistic timeline for all</p>	<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc. In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>

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		<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
	<p>I am writing to raise my strong objection to the proposal of developing land for housing on the farmland between Upper Bucklebury and the A4 and Floral Way.</p> <p>West Berks Council has increasing opportunities to redevelop existing and emerging brownfield sites to accommodate the required extra housing before considering destroying yet more greenfield sites in the beautiful Thames Valley.</p>	<p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning</p>

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	<p>Out of town business parks and retail parks built in the late 1990's early 2000's in the Newbury and Thatcham area, which includes the Vodafone HQ and Pinchington Lane Retail Park, has resulted in the slow demise of Newbury and Thatcham town centres due to losing traders, shoppers, businesses and office workers.</p> <p>More recently, advances in technology has enabled people to shop and work from home and as a result, towns are rapidly becoming ghost towns.</p> <p>Now with the occurrence of a global pandemic, and the requirement for home working and internet shopping, even more premises in towns and out of town business parks and retail parks in Newbury, Thatcham and Reading are increasingly becoming vacant spaces.</p> <p>These brownfield sites have a lot of infrastructure already in place and can be revived, improved, enhanced and developed for housing.</p> <p>As well as benefiting nature and its biodiversity, our green spaces are proving invaluable for more people than ever before as we search for peace and pleasant experiences to clear our minds and breathe fresh air.</p> <p>In my opinion, it is poor foresight to develop greenfield sites when brownfield sites are increasingly becoming underutilised.</p> <p>Planning departments are at the forefront of enabling change and making the right decisions for the future, and we do not yet know whether we will require to adapt further still as Covid and its mutations remain an unknown entity.</p> <p>Thank you for considering my objection.</p>	<p>commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>

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Name Supplied (lpr1448)	<p>As family residents of Upper Woolhampton (address below), I wish to register my objection to the proposed full development of the above sites for the following reasons:</p> <ol style="list-style-type: none"> <li>1. We were made aware of this application/ consultation by neighbours in Bucklebury and have not received any information or correspondence from West Berks Council (WBC). WBC are in my opinion negligent in this process. To make it a fair process, the consultation period should be extended and ALL residents should be formally written to, included and invited by WBC to comment.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. The vision and plan uphold Bucklebury as a rural village community, for the village to remain a predominantly rural AONB. That there is no wish amongst residents to allow growth to change the character and nature of our historic, rural community identity. This document is approved and agreed with WBC and should be included as supplementary planning consideration – yet it is not mentioned in the WBC documentation!?</li> <li>3. In the NWN the following statement is attributed to Hilary Cole. The council's executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), has said: "We are very keen to work with the local community because it's such a big proposal and development for Thatcham." However, WBC have clearly not made good enough attempts to engage with local residents – see above points 1 and 2.</li> <li>4. Loss of village identity. There is simply not enough space between the proposed development and Upper Bucklebury and the boundary of the AONB. The village will practically be part of Thatcham (or the Newbury/Thatcham conurbation) and stands to lose its identity as a village. The proposal would effectively join Upper Bucklebury with Thatcham, which has all but</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to</p>

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	<p>happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identities of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”. WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <p>5. Unacceptable impact on our AONB. According to <a href="http://gov.uk">gov.uk</a>, an AONB has to a combination of several criteria, two of these are:</p> <ul style="list-style-type: none"> <li>• relative wildness, such as distance from housing or having few roads</li> <li>• relative tranquillity, where natural sounds, such as streams or birdsong are predominant</li> </ul> <p>Both of these points stand to be significantly impacted by such a massive nearby development and may no longer be able to be met.</p> <p>6. Increase in traffic pollution and hazards by Bucklebury Common. We moved next to Bucklebury Common to live in the countryside and be away from car, light and noise pollution. Over the 7 years or so we have lived in Upper Woolhampton, we have already noticed a significant increase in traffic on Carbinswood Lane by Bucklebury Common. The introduction of such a huge development to the area would necessarily increase traffic pollution, cause additional road hazards ( neighbours have sadly lost dogs on the road, hit by speeding cars and local wildlife, including snakes, have been run over) and cause significantly more disturbance to the residents and nature, on what are rural country unmarked roads and lanes.</p>	<p>provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide</p>

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	<p>7. Increase in traffic on the route into Thatcham and Newbury and towards the station, which are already heavily congested at busy times. When there are even minor traffic delays/congestion on the main roads, drivers resort to the rural routes which are simply not designed for these increased traffic volumes. An increase in houses in the area stands to significantly increase the traffic volume on our rural roads that are not designed for any increase in traffic volume (nor should they ever be!)</p> <p>8. Increase in traffic and increased potential of speeding through Upper Bucklebury, which is of a major concern due to the primary school and many family residents with children (and pet dogs/ cats). With an increase in traffic, which could be as much as 10%, this will only worsen the situation.</p> <p>9. Impact on Nature. We have seen a number of protected species including the great crested newt, adder, slow worm and bats in and around Bucklebury Common. There are also birds such as the nightjar, which are under conservation concern. We fear increased numbers of cars and people visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this needs to be protected and not put under more threat. The development to the south of Blacklands Copse and Harts Hill Copse will mean open space dramatically reduced and wildlife forced to retreat, adding more pressure on species in decline. Over the last 7 years we have seen a significant increase in the litter in and around the Common and fly tipping in the area. Bringing significantly more people to the area stands to cause more problems like this and more damage to what is already a fragile ecosystem.</p> <p>10. The proposal is an over development of the countryside of rolling hills and farmland and also stands to overdevelop Thatcham. This proposed over development is out of character for the area plans and will have a detrimental impact for the town itself as well as the surrounding villages. Thatcham is at capacity as it. Pre-covid, it was often hard to find a parking</p>	<p>details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>

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	<p>space in the town centre, doctors/dentists are apparently stretched, there's limited parking at the train station and already almost full train services at peak times into London. Not to mention the traffic delays around the crossing. There is no evidence that the development will enhance Thatcham town centre (or indeed Newbury).</p> <p>11. A previous application was resoundingly rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why, only a few years after this, are WBC now considering this site in light of the previous rejection, what has changed? Knowing a smaller planning application has been refused once and that there is clearly significant local objection again, why have massive funds been spent pursuing it?</p> <p>12. Why have WBC and Thatcham council used a great deal of tax payers money in completing many surveys and writing an 800 page report, before going to consultation on the proposal?</p> <p>13. The proposed development will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p> <p>14. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. One pub and shop is hardly justification for a development this size. One thing we love about living in Bucklebury is that there is only one shop and one pub where the community enjoy getting together.</p> <p>15. Bringing more houses and cars to the area will significantly increase the noise and light pollution to a predominantly rural, peaceful area where people live to escape from developments like the one proposed.</p> <p>16. The HELAA was updated in December 2020 to take account of factual inaccuracies. What evidence can WBC produce to prove everything stated in the consultation document is still factually correct?</p>	<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required,</li> </ul>

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	<p>17. Schooling – this will obviously have an impact on local schools (and traffic). Many local families are very concerned that the proposal could overwhelm the brilliant local village schools that currently attract a good number of pupils and maintain a good balance of class sizes. Just because the plans include new schools, it does not mean that new families moving to the area will necessarily choose them. Many may well prefer to try for places at the existing, sought-after, traditional village schools, causing increased class sizes, over-stretching of school resources, increased cars, traffic, people and disruption to small rural villages.</p> <p>18. West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000</a> WBC - Environment Strategy - with declaration of climate emergency. Building 2500 new houses will certainly increase the WBC carbon footprint and goes against the emergency/accelerated goal of carbon neutrality and "protecting and enhancing our natural environment" P5. Increased pollution will certainly be created by the entire construction process, increased light pollution from the development and more cars will bring increased vehicle pollution and noise pollution to our rural area. There are seemingly NO environmental advantages of building a massive development in rural area. A large development can only bring negative environmental impact and therefore goes against the intent, statement and purpose of the WBC environmental strategy.</p> <p>19. The plan suggests the provision of a "country park". There appears to be no budget available for this?</p> <p>If you can please confirm that you have received and will include our registered objection within the consultation period - thank you. Please</p>	<p>amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</p> <ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a</p>



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	<p>also keep us informed on further information and decisions on this matter.</p> <p>For your reference, we have included our names and address below (and our emails above), however, we do not wish for our personal details to be made public - or at least beyond what is simply necessary to register our objection and have our points taken into account during the official consultation process.</p>	<p>strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Chris Willet (lpr1449)	<p>Whilst I recognise the need for increased housing and the Government's requirements on local authorities to meet certain targets, I object to the development proposals on the following grounds.</p> <p><b>Challenge the Need</b> [This issue also entered under SP12] The reduction in available land to develop has been reduced recently by the 30% increase in the areas of the DEPZ's around Aldermaston and Burghfield and I would urge WBC to challenge Central Government on the housing allocation.</p> <p><b>Impact on the AONB</b> The proposal will close the gap between Thatcham and the AONB. This is contrary to the statements within WBC's own document 'North Wessex Downs AONB Landscape Character Assessment (2002)', Policy SP8.</p> <p>Should this unacceptable proposal go ahead, against better judgement, then it should be made a <b>Pre-commencement</b> Condition that the infrastructure to create the 'country park' buffer zone (i.e. set boundaries, tree planting, hedgerows etc.) be established and protected prior to any house building commencing. No consideration should be given to a Section 73 application to vary the Conditions or overturning them at Appeal. In addition, all built development should be limited to being below 95M above OD which is again in accordance with the above-mentioned WBC document (the current proposal shows development up to 125 metres above OD, which would have a serious impact on the</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p>

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	<p>visual amenity in close proximity to the AONB. If this inappropriate over-development should be allowed to go ahead, a large proportion of the CIL monies should be spent on creating the country park / buffer zone. The pie chart which shows the amount of open space is misleading in that it indicates 50% open space but looking at the plans this is clearly not the case and must be also relying on the private garden areas and probably school playing fields as well. This is misleading. Clearly the 50% open space is not going to be available for public use.</p> <p><b>Traffic</b> The traffic study included within the document is woefully inadequate and clearly based on inaccurate data and is a very un-academic piece of work. Up to 5000 more cars (2 car spaces per household as required by WBC planning policy). This will lead to excessive pressure on existing narrow roads and rat runs through villages. There will be further congestion and waiting times at Thatcham level crossing and even more limited station parking, the wrong side of the level crossing. The junction with the A340, Theale to Tidmarsh Road, near Englefield Estate is already highly congested and dangerous and this will be made far worse by the increased number of cars. The proposed mini roundabout to serve the development on Harts Hill Road will become seriously congested at peak times, especially if the roundabout at the Mill Public House is fitted with the proposed traffic lights. This will cause tailbacks further up Harts Hill on the steep blind bend section which will inevitably lead to rear-end shunts.</p> <p><b>Non-Sustainable Location (Traffic)</b> The distance of the proposed development from Thatcham Station and the central amenities in Thatcham will necessitate residents using their cars. Parking in central Thatcham is already inadequate (as recognised by Thatcham Town Council).</p> <p><b>Pressure on Existing Facilities</b> The development will place excessive pressure on existing doctor and dentist surgeries, primary and secondary schools which are already working at capacity as the new facilities proposed will not be constructed in advance of the housing.</p>	<p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

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	<p><b>Use of Brownfield Sites and Existing Buildings</b> Prior to considering developing greenfield sites, full consideration should be given to developing brownfield sites and converting existing commercial buildings such as offices and retail premises (Overbridge Square, Newbury is a good example). The amount of space becoming available is currently increasing due to changes in working practices and online shopping (Covid/internet). There is also a huge amount of vacant residential space above the high street retail premises and there should be incentives to encourage their development.</p> <p><b>Ecology</b> The Pang Valley is a unique, precious and special environment and one of only 200 chalk-fed rivers in the world. There is a huge loss of green field and open space which will lead to an increasing urbanisation of the area. This will also put additional pressure on the AONB in terms of increased traffic and light pollution, pedestrian footfall, littering, illegal use of off road vehicles on the Common and along the River Pang, all with the inevitable detrimental effect on local wildlife and their habitats and the special character of the AONB.</p> <p><b>Surface Water Run-off and Flooding</b> There is no question that the proposed development will have a massive impact on the flood risk to Thatcham.</p> <p><b>Utilities Infra-Structure</b> The existing water, gas and electrical supplies and foul and surface water drainage systems are already stretched to capacity and this development would create unacceptable pressure leading to system failures. I would strongly urge WBC to reconsider this potential development in light of these important considerations and the massive groundswell of public opinion against these proposals. I would strongly urge WBC to reconsider this potential development in light of these important considerations and the massive groundswell of public opinion against these proposals.</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery</p>

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		<p>Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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		<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thattham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thattham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Michael Morrison (lpr1451)	<p>I would like to register my strong objection to the NE Thattham development (Policy SP17) which would effectively place a small town with a population the size of Hungerford to the North East of Thattham, with only two schools, a few shops and the later arrival of a surgery. This will result in extra pressure on the already overloaded surgeries of Chapel Row and Burdwood. Hungerford has numerous shops, a library, schools, doctors’ surgeries, pubs and a large supermarket to serve the population there.</p> <p><b>Lack of publicity.</b> I understand that a large number of the residents of Upper Bucklebury are against the development but it appears that WBC has not mailed anyone or made any attempt to contact ratepayers individually. This surely must seriously affect the validity of the consultation, as most of the local residents are still unaware of what is</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thattham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that</p>

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	<p>being proposed. I was made aware by a post on the local community Facebook page only a few weeks ago. I am sure there are many many residents who have not commented, because they do not know about the plans.</p> <p><b>Flooding</b> is a major concern, and Sue Everett, an environmental consultant who prepared that last report on flooding for the Thatcham council, said to a local resident recently (and she approved the use of this phrase in an email she sent) “It would be utter <b>madness</b> to build on that slope” Meaning the whole of the site which is on “the slope’ that runs down to Colthrop and Thatcham. Run off would be a serious problem and would certainly flood Thatcham and Colthrop with heavy rain, even with mitigation measures.</p> <p><b>Overdevelopment near the AONB</b> despite national measures to preserve the countryside and its amenities</p> <p><b>The proposal makes no mention COVID</b> and the substantial changes to housing and development requirements because of the pandemic. It rather looks like the proposal is outdated. With city centre shops closing, surely a possible solution might be to convert Newbury town centre empty retail buildings to residential? All would be within walking distance of the station, should travel be need to Reading and London.</p> <p><b>Carbon neutral.</b> There is no stipulation that the building will comply with the latest construction and environmental standards. Namely Carbon neutral, or at least net zero emissions, and also be in line with the upcoming legislation [ due out in 2023 ] on Biodiversity Net Gain [ BNG ] Both are hugely important and I believe that WBC have committed to carbon net zero emissions by 2030. This development will not work towards that objective at all.</p>	<p>development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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	<p><b>Wildlife will be seriously affected</b> by such a massive intrusion into the countryside. Bats, badgers, hedgehogs, and other protected species would all be in danger.</p> <p><b>Local water supplies</b> show very varied water pressure, even after the installation of the new Harts Hill pumping station, we have had very low pressure today here in upper Bucklebury. Surely the supply will be completely inadequate for a development of this size.</p> <p>The local character of the area has changed enormously over the 40 odd years I have lived in Bucklebury, This plan will further degrade the countryside and will overload water, sewage, road and rail systems. I firmly believe that it should not be approved in much the same way as the smaller development was turned down in 2017. From the Newbury Weekly News in august 2017: "The Government's decision to turn down two appeals – which would have resulted in more than 700 homes being built in Thatcham – is a strong warning to developers. That was the message from West Berkshire Council's executive member for housing, Hilary Cole (Con, Chieveley), after the crucial ruling.</p> <p>As reported in the <i>Newbury Weekly News</i>, the secretary of state for communities and local government, Sajid Javid, stepped in to overturn the Planning Inspectorate's decision to approve the 495 and 225 home schemes at Siege Cross and Henwick Park.</p> <p>This development surely need the same decision: Rejection.</p>	<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>

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		<p>In regards to water supply, The developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Jack Utley (lpr1452)	<p>As a long-time resident of Bucklebury Parish and a father of three school age children, I wish to register my strong objection to this proposal which I don't believe has gone through a proper consultation with local residents. Everyone I have spoken to is strongly against it and those that are not aware are amazed that such a large development has not received further consultation within the community. I struggled to find any evidence that West Berkshire Council has done any work with the local communities on whom this will have such a big impact.</p> <p>My objections are as follows with bolding on the key areas I care about:</p> <ol style="list-style-type: none"> <li>1. <b>Lack of proper consultation</b> with the local community</li> <li>2. <b>Compromise the AONB</b>. It endangers the AONB settlement pattern and the surrounding environment/habitat of the Upper Bucklebury village and all but joins Upper Bucklebury and Midgham villages in one conjoined urban development with Thatcham along the A4 and Harts Hill Road which as has already happened with Coldash, Thatcham and Newbury</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>



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	<p>destroying their unique identity and heritage and removing any rural aspect of the area.</p> <p>3. <b>Destruction of the environment and bio diversity.</b> It will destroy the local environment and the green fields of rolling countryside that currently exist around Upper Bucklebury village north of the A4, some of which contain ancient woodlands and habitats, all of which are essential to the biodiversity of our wild bird and animal species. These are an essential buffer zones to the AONB habitats of the woodlands and common land in and around Upper Bucklebury which will be destroyed by this development putting at risk the relative wildness, tranquillity and natural surrounds</p> <p>4. It will ultimately increase <b>pollution and traffic</b> on already congested traffic routes along the A4 corridor between Newbury, Thatcham and Midgham.</p> <p>5. It will increase passenger numbers on local transport services which are already oversubscribed. Train services between Newbury and Reading are already standing room only during peak commuting hours. Where and how will all these people get to work?</p> <p>6. This development is <b>contrary to the local development plan</b> of Bucklebury which cites the maintenance and preservation of a strong greenbelt between Thatcham and Upper Bucklebury</p> <p>7. It will <b>increase traffic on the rural road network</b>, especially through Upper Bucklebury towards Chapel Row through the AONB as an alternate route to the A4, increasing speeding and <b>risks to child safety</b> who attend primary schools along this route. For leisure users such as myself, who regularly bicycle in and around the country lanes of Upper Bucklebury with my children, there safety is a big concern.</p> <p>8. This is a <b>massive over development of the countryside in one area</b>. Perhaps the council should consider smaller extensions of existing developments which will have less impact on the surrounding countryside. E.g. the flood plains</p>	<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

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	<p>along the River Kennet and railway line where housing developments have already successfully been built. Thatcham itself is already built in the flood plain.</p> <p>9. This development will result in <b>a big increase in noise and light pollution</b> affecting Upper Bucklebury and surrounding rural areas. There are no street lights in Upper Bucklebury but there will be in the proposed development all spilling upwards into Upper Bucklebury.</p> <p>10. <b>Litter and fly tipping</b> is already on the increase and I can only see this getting worse with the impact being felt the most in and around the common and Upper Bucklebury quiet lanes.</p> <p>Thank you for considering these objections and I trust you will recognise this development is not in the interests of our community.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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		<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Theodora Dorich (lpr1454)	<p>I am writing to object to the potential development of 2,500 houses to the North East of Thatcham.</p> <p>The area is already poorly under resourced in terms of amenities and decent infrastructure i.e. schools and the pressure of 2,500 houses on this will prove catastrophic.</p> <p>The area provides an important buffer between Thatcham and Upper Bucklebury that with the development will see the two locations merge.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>This will put an unimaginable amount of pressure on the common and other countryside benefits nearby.</p> <p>I hope that you listen to the voices of those that currently live in the community. I imagine there are numerous more suitable locations a development of this magnitude would be more appropriate.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
Richard Neville (lpr1457)	<p>I would like to object to your proposal to build 2,500 houses on land north of Thatcham on the following grounds:</p> <ol style="list-style-type: none"> <li>1. TRAFFIC</li> </ol> <p>A development of this size will inevitably bring a huge influx of cars to the roads around the proposed development. Many of these roads are narrow, winding country lanes which have no pavements. Harts Hill is a particularly dangerous road already as it is barely wide enough for two large vehicles to pass and has several sharp bends. Upper Bucklebury and Cold Ash will become rat runs for drivers looking for a quick route to Reading, the A34 and the M4. The roads out of Thatcham are already congested, particularly over the level crossing but also both ways along the A4 at peak times. The additional traffic on all these roads will make accidents much more likely.</p> <ol style="list-style-type: none"> <li>2. LOSS OF GAP BETWEEN THATCHAM AND UPPER BUCKLEBURY</li> </ol> <p>West Berks Council have long advocated the maintenance of this gap which is an important separation between the two communities. It creates a rural feel to both communities which is very important to the well-being of the residents many of whom walk the footpaths through</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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	<p>the fields. The loss of this gap will not only destroy the "boundary" but it will also destroy an important green space which borders an Area of Outstanding Natural Beauty (see point 3).</p> <p>3. THREAT TO BUCKLEBURY COMMON AND THE AONB</p> <p>These areas are already under threat because of the numbers of visitors and the way the common is used. There are many rare species of birds and animals living in this area and their habitat will inevitably be disturbed, if not destroyed, by any increase in people using the common for recreation. We are fighting a constant battle against people who ride motorbikes and drive large 4x4 vehicles both during the day and at night. Even walkers can cause a lot of damage especially if they allow their dogs to run free where birds are nesting on the ground from April to August. The volume of buildings proposed will affect the habitat too; there will be light and noise pollution which will drive away some of the birds and animals from the AONB.</p> <p>4. LACK OF VALIDITY OF THE NEED FOR THESE HOUSES</p> <p>WBC do not appear to need another 2500 houses and it would be interesting to know how this figure has been calculated. In addition, the analysis of housing demand is out of date given that the world has changed so much in the last year. This plan should at least be put on hold until the government has had time to reassess the situation following the Covid-19 pandemic.</p> <p>5. LACK OF ADEQUATE DRAINAGE</p> <p>This land is on a slope and any development will need extensive (and expensive) drains in order to avoid flooding the houses below in Thatcham.</p>	<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>

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		<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

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		<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In regards to concerns raised in relation to the drainage, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p>
Michael Morrison (lpr688)	[I] would like to register my strong objection to the NE Thatcham development (Policy SP17) which would effectively place a small town with a population the size of Hungerford to the North East of Thatcham, with only two schools, a few shops and the later arrival of a surgery. This will result in extra pressure on the already overloaded surgeries of Chapel Row and Burdwood. Hungerford has numerous shops, a library, schools, doctors' surgeries, pubs and a large supermarket to serve the	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the</p>

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	<p>population there.</p> <p><b>1. Lack of publicity.</b> I understand that a large number of the residents of Upper Bucklebury are against the development but it appears that WBC has not mailed anyone or made any attempt to contact ratepayers individually. This surely must seriously affect the validity of the consultation, as most of the local residents are still unaware of what is being proposed. I was made aware by a post on the local community Facebook page only a few weeks ago. I am sure there are many many residents who have not commented, because they do not know about the plans.</p> <p><b>2. Flooding</b> is a major concern, and Sue Everett, an environmental consultant who prepared that last report on flooding for the Thatcham council, said to a local resident recently (and she approved the use of this phrase in an email she sent) “It would be utter <b>madness</b> to build on that slope” Meaning the whole of the site which is on “the slope’ that runs down to Colthrop and Thatcham. Run off would be a serious problem and would certainly flood Thatcham and Colthrop with heavy rain, even with mitigation measures.</p> <p><b>3. Overdevelopment near the AONB</b> despite national measures to preserve the countryside and its amenities</p> <p><b>4. The proposal makes no mention COVID</b> and the substantial changes to housing and development requirements because of the pandemic. It rather looks like the proposal is outdated. With city centre shops closing, surely a possible solution might be to convert Newbury town centre empty retail buildings to residential? All would be within walking distance of the station, should travel be need to Reading and London.</p>	<p>development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local</p>



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	<p><b>5. Carbon neutral.</b> There is no stipulation that the building will comply with the latest construction and environmental standards. Namely Carbon neutral, or at least net zero emissions, and also be in line with the upcoming legislation [ due out in 2023 ] on Biodiversity Net Gain [ BNG ] Both are hugely important and I believe that WBC have committed to carbon net zero emissions by 2030. This development will not work towards that objective at all.</p> <p><b>6. Wildlife will be seriously affected</b> by such a massive intrusion into the countryside. Bats, badgers, hedgehogs, and other protected species would all be in danger.</p> <p><b>7. Local water supplies</b> show very varied water pressure, even after the installation of the new Harts Hill pumping station, we have had very low pressure today here in upper Bucklebury. Surely the supply will be completely inadequate for a development of this size.</p> <p>The local character of the area has changed enormously over the 40 odd years I have lived in Bucklebury, This plan will further degrade the countryside and will overload water, sewage, road and rail systems. I firmly believe that it should not be approved in much the same way as the smaller development was turned down in 2017. From the Newbury Weekly News in august 2017: "The Government's decision to turn down two appeals – which would have resulted in more than 700 homes being built in Thatcham – is a strong warning to developers. That was the message from West Berkshire Council's executive member for housing, Hilary Cole (Con, Chieveley), after the crucial ruling.</p> <p>As reported in the <i>Newbury Weekly News</i>, the secretary of state for communities and local government, Sajid Javid, stepped in to overturn the Planning Inspectorate's decision to approve the 495 and 225 home schemes at Siege Cross and Henwick Park.</p> <p>This development surely need the same decision: Rejection.</p>	<p>economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p>Please see my submission above. The plan needs to be reconsidered in light of all the objections and the effect COVID has a will have on the local area and its housing and transport needs.</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to water supply, The developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Nicola Wilson (lpr1455)	<p>I am writing to stress my opposition to the above 'Thatcham New Town' proposals in the strongest terms.</p> <p>The proposals would destroy valuable green space around Thatcham without offering any benefit to the residents of Thatcham and the surrounding villages. That land has previously been considered for housing but rejected with good reason.</p> <p><b>Flooding risk:</b> Thatcham is already at risk of flooding, even with the current beefed up flood measures in place. Those fields are currently waterlogged. Building on them would result in a huge run-off of water on to what is de facto the Kennet flood plains.</p> <p><b>Risk to nature:</b> the fields lie alongside areas of Bucklebury that support</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p>rare indigenous species that require quiet and dark skies - such as nightjars and slowworms. The disturbance from the works alone would be enough to displace them.</p> <p><b>Traffic:</b> the plans do not take into account the current traffic issues (even in a pandemic); they would commuting routes through the surrounding villages. There would be an additional 5,000 cars on roads that can barely cope during a national lockdown. There would be a knock-on effect for people with respiratory illness. The Thames Valley has very high levels of asthma, which for many is exacerbated by traffic fumes, with deaths already being attributed to build-up of toxic smog.</p> <p><b>Harm to mental health:</b> the plans risk creating an enlarged town with little to no green space and/or views. For residents of Thatcham, this would be highly detrimental to mental health.</p> <p><b>Harm to physical health:</b> these fields are dotted with rights of way and are regularly walked by local families. These people would lose a valuable resource.</p> <p><b>Lack of green planning:</b> nothing in the plans supports an environmentally friendly approach. Any new buildings should be using recycled and/or carbon neutral materials.</p> <p><b>No infrastructure:</b> there is nothing in these plans that would create an enhanced infrastructure for either Thatcham or the surrounding villages. There are no facilities that would improve quality of life for people either moving in or already living here. There is insufficient parking already at Thatcham and the line east is one of the busiest in the country. The existing services - under normal circumstances - would not be sufficient to take hundreds of additional commuters. There is no other public transport to speak of.</p> <p><b>Lack of future planning:</b> nothing in these plans reflects the fact that</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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	<p>we are living in the 21st century. These developments would look ugly and dated in 1990, let alone 2037. There is no suggestion of civic planning - town squares, amenities etc - it is a pure play housing estate dumped on the side of an existing town. In short - who would want to buy a house there?</p> <p>Any redevelopment of Thatcham and Newbury should be looking to build high density, mixed housing on brownfield sites, to create communal spaces - squares, parks, pedestrianised streets, high speed internet access - with cables below ground - to create sympathetic spaces where a variety of people can co-exist and to create genuinely affordable housing, constructed in partnership with housing associations.</p> <p>Endless three-bedroom semi-detached estate homes are deeply damaging for nature, ugly, dated and undesirable. Nothing in this consultation suggests that any younger people were canvassed for their views as to where they might wish to live in 15 years' time. There has been no input from the nature trusts, the civic bodies or the transport lobby groups.</p> <p>Any project of this size should have been undertaken with wide consultation, not a lazy dumping of houses on an unloved town snuck out just before Christmas.</p>	<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West</li> </ul>

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		<p>Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</p> <ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan. Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site will be delivered to achieve a sustainable, comprehensive and landscape-led development. The draft policy outlines that this will be a mixed use scheme and not solely comprise of housing to ensure that it is a sustainable development.</p>
Robert and Sharon McKellar (lpr1456)	<p>I wish to object to the proposal to build 2500 homes in North East Thatcham/Midgham.</p> <p>This is far too big a development for one area to absorb. The increased traffic will put far too much strain on the A4 and local roads. Joining the A4 is our main route out of Midgham and is already difficult at peak times and impossible if turning right to Thatcham. We have already had one fatality there.</p> <p>The Government has banned the burning of house coal and wet wood in order to improve air quality and hence health but this proposal with</p>	<p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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	<p>significantly increased traffic will cause a serious deterioration of air quality, especially when we already have a polluting crematorium in Midgham.</p> <p>It would be impossible to maintain the character of Midgham which is defined as an area of valuable open countryside and forms part of the North Wessex Downs AONB, and also of Thatcham which is a large village and as such is unable to take this level of development.</p> <p>As for building new shops, since current trends show they are in decline and will not be used in the future.</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Pam Norman (lpr1459)	<p>I am writing to object to the 2500 houses which are planned for NE Thatcham, between Thatcham and U Bucklebury. Please, please, please do not approve this planning application and think instead of the effect it would have on the local environment for the next generation's future.</p> <p>If we do actually need more housing, which I personally don't think we do, then please consider using all the empty buildings- shops and offices etc - in Newbury and approve plans to develop these.</p> <p>Thatcham in the past 40 years has already been over developed and cannot realistically sustain any more. Secondary and primary schools are full, medical surgeries are full and the roads and parking are already inadequate.</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>I strongly object to this planning application and hope that you listen and take notice of all the local residents' views.</p>	<p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet</p>

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		the impact of the development. Additional school provision is included in the IDP.
John Wright (lpr1653)	<p>I am writing to lodge my objection to the above proposal given the size of the development and its impact on the village of Upper Bucklebury and the surrounding area.</p> <p>Of particular concern is the impact this proposed development will have on the environment. The northern boundary will be in close proximity to an AONB which includes areas of ancient woodland and common land that would be adversely affected by the increase in traffic, visitors and light pollution. During the current pandemic, the village has seen significant evidence of trespassing and problems with irresponsible dog walkers and I fear that this would increase if this development goes ahead. The spectacular views across The Kennet Valley to North Hampshire will be lost forever by this development.</p> <p>A second, but equally important, problem will be that of the increase in traffic. The road through Upper Bucklebury and those through neighbouring villages are already subjected to motorists using them as a means of avoiding the A4 and accessing the A34. This will only get worse if this development is approved. The impact of noise and air quality from this additional traffic will be significant.</p> <p>When Floral Way was constructed it was meant to constitute an important boundary between Thatcham and Upper Bucklebury. This proposal would break that strategic gap and result in the loss of the village's identity as a rural community. Bucklebury Vision set out a policy whereby the natural beauty of the landscape and the visual quality of the area should be maintained. This proposed development seriously undermines those objectives.</p> <p>What will future generations think of us if we desecrate this greenfield site with all the ramifications that it will have on the environment? The planning system is meant to protect rural environments and the</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance,</p>



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	<p>increasing awareness of the importance of such areas in the face of climate change makes it even more important that these valuable sites are not destroyed. Once under bricks and concrete they will be lost forever.</p>	<p>without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed</p>

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		<p>submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Newbury Racecourse (lpr1687)	<p><i>Full representations on behalf of Newbury Racecourse attached</i></p> <p>The Consultation Document identifies several sources of housing supply across the plan period. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.</p> <p>Table 2: Housing Supply at March 2020 of the Consultation Document confirms that 4,653 dwellings have planning permission, 1,482 dwellings are allocated without permission (with a 1,000 dwellings from Sandleford Park and 482 dwellings carried forward from the HSA DPD); and a windfall allowance of 1,979 dwellings. This amounts to 8,114 dwellings – and therefore to meet the proposed requirement of 575 dpa there is a need to find a further 1,661 dwellings during the plan period.</p> <p>The Consultation Document includes the delivery of two strategic urban extensions: Sandleford Park (1,500 dwellings) and North-East Thatcham (2,500 dwellings). The Council assumes that 1,250 dwellings are deliverable at NE Thatcham within the plan period.</p> <p>It is proposed that a further 315 dwellings will be allocated via Neighbourhood Plans and 490 dwellings on newly allocated sites.</p> <p><b>Critique</b></p>	<p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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	<p><u>Large Strategic Sites</u></p> <p>It is anticipated that Sandleford Park and North East Thatcham will provide 1,000 and 1,250 dwellings up to 2037, respectively. The Council therefore rely greatly on the delivery of these two large strategic sites to deliver the housing need over the plan period.</p> <p><u>North East Thatcham</u></p> <p>NE Thatcham, on the face of it, provides an easy solution for the Council to increase housing numbers to meet the overall requirement, but further information is required to demonstrate the deliverability and viability of the site for 2,500 dwellings. In particular, there are concerns that:</p> <ul style="list-style-type: none"> <li>• there is a need for further detailed technical evidence (transport, drainage, landscape, heritage, ecology etc.) to demonstrate the deliverability and capacity of the site;</li> <li>• the location of the site close to the North Wessex AONB may significantly reduce density of the site (particularly towards the edge) and, therefore, the delivery of 2,500 dwellings requires further assessment as more detailed evidence is prepared;</li> <li>• construction mineral deposits need to be investigated thoroughly to ensure development does not sterilise a workable resource. Indeed, prior extraction should occur where practicable;</li> <li>• there appears to be no assessment of the impact of much of the site being located within the Outer Consultation Zone (OCZ) for AWE Aldermaston; and</li> <li>• the proposals must be strongly grounded in viability to ensure that key infrastructure can be delivered alongside housing to deliver the objectives of the scheme and wider benefits to Thatcham.</li> </ul>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual</p>

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	<p>With regards to the build out rate the Thatcham Strategic Growth Study Stage 3 Report: Thatcham Future (September 2020), at Appendix B, assumes a total period of 17 years from first completions. For most of the build-out period, an average of 160 dwellings per year has been applied (apart from the first year of 50 dwellings).</p> <p>The market evidence demonstrates that for schemes of 2,000+ dwellings, the lead-in time from validation of an application through to first completions is approximately 8.4 years (Source: Lichfield's Start to Finish (2nd Edition), February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2022 in the LDS) and taking the view that the planning application for the site is submitted by the end of 2023/2024, first completions cannot be projected before 2032/2033. Further, this timescale may be optimistic if prior mineral extraction is required and there are delays to the adoption of the Plan.</p> <p>With the above in mind, it is considered that the Council should take a cautious approach with the site identified as potentially delivering housing supply towards the latter end of the plan period. As such, the scale of development proposed in the plan period should be significantly reduced. Delivering completions in the last five years of the Plan would equate to around 690 dwellings (significantly less than 1,250 dwellings suggested) based on the build out rates in the Growth Study which are supported by market evidence.</p> <p>It is considered that the Council should take a cautious approach with the site identified as potentially delivering housing supply towards the latter end of the plan period. As such, the scale of development proposed in the plan period should be significantly reduced. Delivering completions in the last five years of the Plan would equate to around 690 dwellings (significantly less than 1,250 dwellings suggested) based</p>	<p>representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

Respondent (with lpr ref)	Response	Council Response
	on the build out rates in the Growth Study which are supported by market evidence.	
Hilary Cairns (lpr1460)	<p>I am writing to object to the North East Thatcham development of 2500 houses.</p> <ol style="list-style-type: none"> <li>1. West Berkshire Council's plans breach the strategic gap of the natural community boundary between Thatcham and Upper Bucklebury. The huge number of houses proposed will increase the number of vehicles using the surrounding village lanes, which are already over used and suffer from increasing speeding issues, that are rarely addressed, and the breakdown of road surfaces.</li> <li>2. Additionally the loss of habitat and already endangered species from the proposed building development to the surrounding common and AONB land will leave all of us and our children poorer. Once the loss of wild animals and habitat has occurred it will not return.</li> <li>3. Can we urbanise our landscape, whilst paying lip service to protecting green field sites? Where is the 'enhance the natural beauty of the area' (LPR para.4.23)? SP2: 'conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of development proposals', I fail to see how 2500 houses can possibly 'mesh' with the above (hollow?) words.</li> <li>4. Your Policy DC6: 'development which would overload available facilities and create or exacerbate problems of flooding or pollution will not be permitted' speaks for itself.</li> <li>5. Most people appreciate that central government instruct councils to build, and endeavour to build a vibrant economy for their areas. This strategy was tried after the 2008 crash - it still took 10 years to recover, so that strategy did not work. There is going to be even greater pressure 'to build us out of the current</li> </ol>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>crisis'. We must find a balance between saving our countryside of protected AONB, greenfield sites and common land. Building zero carbon dwellings with the latest heat retention technologies for them, ensuring that traffic impact is minimal, using green energy are fine ideas, unfortunately this will not be achieved as developers are resistant to costly new technology use and we end up with a 'same old, same old' housing estate like all the others that have been built in Thatcham over the years. SP5 'the principles of climate change mitigation and adaptation will be embedded into new development', a must.</p> <p>6. The threat of no infrastructure if 2500 houses are not built rather defeats the argument as your 'Stage 1 study: the growth of Thatcham from 1971 to present' clearly shows that needed facilities have not kept up with developments and to imply that previous developments have been too small to build the infrastructure required is bizarre: 1971 population 10,500 = 1 secondary school; 2018 population 26,000 = 1 secondary school.</p> <p>7. The strategic gap between Upper Bucklebury and Thatcham will be lost, the edge of the AONB and Bucklebury Common will be compromised, and the Thatcham settlement boundary will be irretrievably broken.</p> <p>For all the above reasons I object to the proposed development of 2,500 houses in North East Thatcham up to year 2037.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

Respondent (with lpr ref)	Response	Council Response
Bernard Coulson (lpr1461)	<p>I wish to object in the strongest terms to the proposed development of the above site for the following reasons.</p> <ol style="list-style-type: none"> <li>1. For a policy that purports to be planning for the future it lacks pro activity and misses opportunities. Society is becoming increasingly concerned with climate change, natural resources, including soil, food production, water control and usage, conservation and human health. There is a significant positive correlation between these considerations and the condition and availability of soil. The proposal does nothing to give effect to this correlation, instead it destroys a huge area of earth that for a variety of reasons is strategically and usefully situated. The soil needs “re wilding” not made defunct or removed. The science and cost benefit of so doing are compelling.</li> <li>2. This is an unacceptable proposal given the existing brownfield sites available and the changing nature of central business districts within settlements where some commercial properties could be repurposed and redeveloped as dwellings. The proposed development is devoid of a sense of assimilation, resembling more of a blot on the landscape.</li> <li>3. West Berkshire Council are on record saying “development north east and east of Thatcham would result in the loss of separate identification of Cold Ash and Bucklebury and would harm the setting of the AONB settlement pattern”. This requirement is still relevant. The proposal virtually joins Thatcham to Upper Bucklebury and is in complete contradiction. It certainly fails to maintain any sense of a loose scatter of buildings. At the time of the AONB boundary being set it had to meet several criteria established by Government, which, given societies increasing appreciation of the environment is more, rather than less appropriate today.</li> </ol>	<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Government criteria relating to tranquillity and wildness would be completely compromised if the buffer zone was eroded.</p> <ol style="list-style-type: none"> <li>4. Much of the proposed site occupies rising ground making the intended blocky urban spread starkly visible particularly when viewed from the south. Cover of darkness would give no respite either because of the light pollution.</li> <li>5. 2500 extra properties would result in a large volume of traffic not just on main roads but also on the country lanes. In and around the surrounding villages. Strangely WBC documentation does not address this given that lanes are more dangerous to drive on. This is at odds with the WBC Local Transport Plan 2011 to 2026 Active Travel Strategy and more especially with the Bucklebury Quiet Lane Scheme initiated by WBC and supported by local residents.</li> <li>6. Bucklebury Vision and the Bucklebury Plan are documents approved and agreed with WBC. Despite their being accepted as constituting supplementary planning considerations they are not mentioned in the WBC documentation or appear to have been taken into account.</li> <li>7. Similarly the process of consultation with the community seems to have been limited and low profile. The resulting lengthy, and expensive document therefore gives a strong perception of being presented as a fait accompli.</li> <li>8. I have limited my comments but I am concerned for the residents of Thatcham regarding parking, schooling, doctor's surgeries, level crossing bottle neck and flooding potentially greater than that greater than July 2007. The latter raises a significant duty of care for the authorities towards householders and commercial entities both present and future.</li> </ol>	<p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
<p>Simon Tonkyn (lpr692)</p>	<p>1/ You state (Ref 6.36) that Thatcham has grown 5 times its size since 1951 and reflecting that the social infrastructure has not grown in synchronisation with this. I struggle to understand the logic therefore of how adding more than 2500 houses would improve the situation. Would it not make sense to resolve this for the existing housing stock before adding thousands more houses into the mix?</p> <p>2/ How exactly would on-site renewable energy assist in the delivery of a carbon neutral development. Where is the supporting evidence and surely no development by definition would deliver this outcome. Also how many additional vehicles (many not electric) would be added to the local road network further increasing emissions and pollution with potential detrimental health impacts.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The next draft of the document will be informed by a Study being undertaken by the Council to enable carbon neutral development. In addition, the emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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	<p>3/ You talk about appropriate vehicular accesses and sustainable transport through routes and yet even before any of this is considered traffic heading in and out of Thatcham via Thatcham station is routinely stationary for up to 40 minutes causing traffic at times to be backed up all the way to the A4. It is reasonable to assume that a significant proportion of working people living in this development would be working in locations that would make this the most likely route they would take to their place of work. This would further exacerbate the delays and pollution caused by cars and lorries leaving their engines running. There are already proven cases of deaths resulting from vehicular pollution and this proposed development would be a direct contributor to increasing rather than reducing pollution and how would this contribute to the target of carbon net zero by 2030 announced by West Berkshire Council?</p> <p>4/ The A4 between Thatcham and Theale is a well-known accident hotspot, so much so that the council have placed signs warning drivers of the dangers of the road. With more warehousing being built responding to the move away from normal retail outlets this can only get worse as more and more lorries use this road causing more congestion, more pollution and in turn more risks of accidents and risk to life. The proposed development will be at the two pinch points where all this HGV traffic enters the industrial estates and this can only increase the accident risk further and increase the dangers for pedestrians who use the existing pavements on the A4 in the area for exercise.</p> <p>5/ You state that there will be a biodiversity net gain. How can that possibly be the case with so much habitat destruction and the loss of existing paths and green space. Destroying an area of this size cannot possible result in a biodiversity net gain.</p> <p>6/ Once the Covid-19 pandemic restrictions are lifted traffic in the area will return to pre-pandemic levels and all the resultant traffic congestion that was there is all directions beforehand. The location of this proposed development, without large scale infrastructure improvements</p>	<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to</p>

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	<p>including a bridge over Thatcham railway crossing, will just exacerbate this. In addition the increase of traffic using Crookham Hill (which is a very narrow road) can only but increase the risk of accidents and injury.</p> <p>7/ There is no evidence I am aware of that the trend away from retail outlets in town centres is going to change. In fact the opposite is happening. Isn't it much more likely that to satisfy the demands of 2,500 more homes that instead of retail outlets and some character in Thatcham town centre it will just become larger and large supermarkets and even more soulless.</p> <p>In conclusion I would say that Thatcham having grown 5 times since the 50's has contributed enough to the demands for increased housing and this development further erodes the very character this seeks to enhance and should not proceed.</p> <p>West Berks Council have been quoted as saying that certain road improvements would not actually improve congestion rather just increase the volume of traffic thereby negating any benefit. This huge development may well be sold quickly and add several thousand more families into an area already over developed and though I admit to having no expert knowledge and of the opinion (just like the road improvements) have no net benefit and this need could be satisfied in other locations causing less impact to people's lives and the environment.</p>	<p>local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Biodiversity net gain was introduced through the NPPF and is referenced in paragraphs 174 d) and 179 b) and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done. Mandatory biodiversity net gain is now set out in the Environment Act 2021 and applies in England only through the amendment of the Town &amp; Country Planning Act (TCPA) and is due to enforced from November 2023. The mandatory requirement is to achieve at least a 10% biodiversity net gain increase from the pre-development biodiversity value. The requirement is framed as a pre-commencement condition, meaning that the biodiversity gain condition must be discharged before development can begin. Prior to the commencement of a development, a biodiversity gain plan must be submitted to the relevant planning authority for approval. The biodiversity gains and losses of a development will be measured in 'biodiversity units', using a metric which uses habitats as a proxy for biodiversity and calculates units by taking account of the type, extent and condition of habitats. Natural England has recently published biodiversity metric which, subject to further consultation and any further updates, is expected to be the metric specified for mandatory biodiversity net gain.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Emily Boulstridge (lpr1462)	<p>As a long-time resident of Bucklebury Parish and a father of three school age children, I wish to register my strong objection to this proposal which I don't believe has gone through a proper consultation with local residents. Everyone I have spoken to is strongly against it and those that are not aware are amazed that such a large development has not received further consultation within the community. I struggled to find any evidence that West Berkshire Council has done any work with the local communities on whom this will have such a big impact.</p> <p>My objections are as follows with bolding on the key areas I care about:</p> <ol style="list-style-type: none"> <li>1. <b>Lack of proper consultation</b> with the local community</li> <li>2. <b>Compromise the AONB.</b> It endangers the AONB settlement pattern and the surrounding environment/habitat of the Upper Bucklebury village and all but joins Upper Bucklebury and Midgham villages in one conjoined urban development with Thatcham along the A4 and Harts Hill Road which as has already happened with Coldash, Thatcham and Newbury destroying their unique identity and heritage and removing any rural aspect of the area.</li> <li>3. <b>Destruction of the environment and bio diversity.</b> It will destroy the local environment and the green fields of rolling countryside</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>that currently exist around Upper Bucklebury village north of the A4, some of which contain ancient woodlands and habitats, all of which are essential to the biodiversity of our wild bird and animal species. These are an essential buffer zones to the AONB habitats of the woodlands and common land in and around Upper Bucklebury which will be destroyed by this development putting at risk the relative wildness, tranquillity and natural surrounds</p> <p>4. It will ultimately increase <b>pollution and traffic</b> on already congested traffic routes along the A4 corridor between Newbury, Thatcham and Midgham.</p> <p>5. It will Increase passenger numbers on local transport services which are already oversubscribed. Train services between Newbury and Reading are already standing room only during peak commuting hours. Where and how will all these people get to work?</p> <p>6. This development is <b>contrary to the local development plan</b> of Bucklebury which cites the maintenance and preservation of a strong greenbelt between Thatcham and Upper Bucklebury</p> <p>7. It will <b>increase traffic on the rural road network</b>, especially through Upper Bucklebury towards Chapel Row through the AONB as an alternate route to the A4, increasing speeding and <b>risks to child safety</b> who attend primary schools along this route. For leisure users such as myself, who regularly bicycle in and around the country lanes of Upper Bucklebury with my children, there safety is a big concern.</p> <p>8. This is a <b>massive over development of the countryside in one area</b>. Perhaps the council should consider smaller extensions of existing developments which will have less impact on the surrounding countryside. E.g. The flood plains along the River Kennet and railway</p>	<p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as</p>

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	<p>line where housing developments have already successfully been built. Thatcham itself is already built in the flood plain.</p> <p>9. This development will result in <b>a big increase in noise and light pollution</b> affecting Upper Bucklebury and surrounding rural areas. There are no street lights in Upper Bucklebury but there will be in the proposed development all spilling upwards into Upper Bucklebury.</p> <p>10. <b>Litter and fly tipping</b> is already on the increase and I can only see this getting worse with the impact being felt the most in and around the common and Upper Bucklebury quiet lanes.</p> <p>Thank you for considering these objections and I trust you will recognise this development is not in the interests of our community.</p>	<p>being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all</p>

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		<p>reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p>
Michelle Paice (lpr2060)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons. These reasons will be similar to other objections, but I agree with every one of them.</p> <ol style="list-style-type: none"> <li>1. The Vast majority of Upper Bucklebury residents are against this development, many have already registered their objections, however many are not aware of the application or consultation as no information has been sent out by WBC. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> <li>3. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>



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	<p>(<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating <b>“particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”</b>.</p> <p>WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <ol style="list-style-type: none"> <li>4. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far?</li> <li>5. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</li> <li>6. In the NWN the following statement is attributed to Hilary Cole.</li> </ol> <p>The council’s executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), said: <b>“We are very keen to work with the local community because it’s such a big proposal and development for Thatcham. “We have taken a conscious decision to do this around Thatcham so it will deliver the infrastructure we need. “We feel that Thatcham is best placed to take a development of this size.”</b></p> <p>I have two specific issues to object to on these statements made. Firstly WBC have done very little if any to work with local residents – see</p>	<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>above points and secondly Ms Cole's statement infers that the decision is made, so why is so called consultation being held? Because of this she should resign.</p> <ol style="list-style-type: none"> <li>7. WBC and Thatcham councils have wasted a great deal of tax payers money in completing many surveys and writing an 800 page report, effectively making this a fait accompli, before going to consultation on the proposal.</li> <li>8. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</li> <li>9. This will significantly impact the freight traffic using the industry site at Thatcham</li> <li>10. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</li> <li>11. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</li> <li>12. It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</li> <li>13. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this size. The shop is also likely to suffer as the plan indicate that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</li> <li>14. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</li> </ol>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p>15. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</p> <p>16. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>17. The HELAA was updated in December 2020 to take account of factual inaccuracies – who is to say that the same people who have made the assessment of this site don't have their facts right in this document or this time. What evidence can WBC produce to conclude everything stated is factually correct.</p> <p>18. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. When would this be built before or after the houses? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p> <p>Please refuse permission for this development. It would, in effect, add the equivalent of Hungerford onto the edge of Thatcham, but without any infrastructure to support it.</p>	
Gary Clarke (lpr698)	This development changes the character of Thatcham and destroys green fields in contradiction to all current thinking on new developments. A country park is NOT countryside and is not an acceptable substitute.	Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.

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	<p>Traffic is already at a standstill on Floral Way and the A4 in normal rush hour times and heavy lorries using the distribution centres on Colthrop Industrial estate add to transport issues in the area. The queues and pollution at the rail crossing at Thatcham will be made worse by the new development and the ensuing increase in commuter car journeys. The residents of the new houses are not at all likely to work locally and any plan that relies on hoping that they will is unacceptable.</p> <p>Brownfield sites should be used first and the Council should not be adopting a developer led proposal which is in the developers favour to the detriment of Thatcham residents.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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Mr and Mrs Pittard (lpr1964)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached as a response to Policy SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham.</i></p> <p>Policy SP17 of the draft Local Plan confirms that land to the north east of Thatcham is allocated for a residential-led development comprising approximately 2,500 homes. Supporting text (paragraph 6.45) confirms that “<i>Delivery of at least 1,250 dwellings is anticipated within the plan period.</i>”</p> <p>As outlined above, we agree with the Council’s proposed strategy for growth, which follows the District-wide settlement hierarchy set out in policy SP3, focusing new development in the most sustainable parts of the District. Thatcham, along with Newbury and the Eastern Urban Area, is at the top of the settlement hierarchy and is therefore a sustainable location in the District that is suitable for significant growth.</p> <p>However, we query the Council’s expectation that at least 1,250 dwellings will be delivered to the north east of Thatcham within the Plan-period. Again, in the absence of a housing trajectory, Lichfield’s publication (18) is helpful in providing an indication of the timescales involved in delivering the site.</p> <p>For sites of 2,000+ dwellings, a realistic built-out rate is noted as being around 160 dpa<sup>19</sup>. This accords with the build-out assumptions set out in Appendix B of the Thatcham Strategic Growth Study (Stage 3 Report: Thatcham Future) (September 2020) (20).</p> <p>The Growth Study assumes a total delivery programme (for the total 2,500 homes) of 17 years from first completion but does not set out when first completions are anticipated.</p>	<p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council’s strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>

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	<p>If North East Thatcham were to be delivered at 160 dpa, first completions would need to take place around 2029/30 to achieve 1,250 dwellings within the Plan-period. However, as Lichfield's have found that for similar scale sites it can take around 8.4 years to progress from the validation of a planning application to completion of the first dwelling (21), this seems unrealistic.</p> <p>Assuming an application for 1,250 dwellings is submitted in 2022/23, first completions are unlikely to be achieved until around 2030/31. This is one year beyond the period needed to achieve 1,250 dwellings within the Plan-period, <b>assuming all technical issues are addressed, and this quantum of housing is deliverable, given potential site constraints and viability.</b> However, as the Thatcham Strategic Growth Study confirms that in year 1 only 50 dwellings would be completed, the number of dwellings to be completed within the Plan-period reduces further.</p> <p>In light of the above, we recommend that the amount of housing that it is anticipated will come forward at North East Thatcham within the Plan-period is, at the very least, reduced significantly. Furthermore, we recommend that additional sites should be allocated for housing, focused on small / medium sized sites that can come forward quickly, particularly in the early part of the Plan-period. These should be distributed in line with the settlement hierarchy outlined in policy SP3.</p> <p>(18) <a href="https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scalehousing-sites.pdf">https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scalehousing-sites.pdf</a></p> <p>(19) Figure 7</p> <p>(20) With the exception of year 1 (50 dpa) and year 16/17 (130 dpa)</p>	

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	<p>We recommend that the amount of housing that it is anticipated will come forward at North East Thatcham within the Plan-period is, at the very least, reduced significantly. Furthermore, we recommend that additional sites should be allocated for housing, focused on small / medium sized sites that can come forward quickly, particularly in the early part of the Plan-period. These should be distributed in line with the settlement hierarchy outlined in policy SP3</p>	
<p>Claire Dallimore (lpr1475)</p>	<p>Reasons for my objection:</p> <ul style="list-style-type: none"> <li>• <b>The land is green space</b>, home to a number of British wildlife species, flora and fauna. For example; Red kites, Roe Deer, Muntjack, Adders, Bluebells, Badgers, Red Spotted Woodpeckers and in close proximity to the area of the site on Burdens Heath is an annual home to Nightjars which have an Amber rating on the protected by The Wildlife Countryside Act 1981.</li> <li>• <b>Increase of Traffic and Pollution</b>, this will affect the whole community hugely; the village of Upper Bucklebury is already used as a rat run. The road that we live (Harts Hill Road, leading to Burdens Heath and Cold Ash) doesn't have a footpath, our children and the neighbour's children currently walk to school jumping into hedgerow avoiding the current volume of traffic, with this huge housing development adding to the volume of cars this will be catastrophically dangerous for any pedestrians and cyclists.</li> </ul> <p>The picture above was taken on the 1<sup>st</sup> Feb, normally the road has a number of parked cars in front of the white car as per picture, due to lockdown the panel beaters is currently closed and therefore are less parked cars.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>



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	<ul style="list-style-type: none"> <li>• The Level crossing at Thatcham Station, as all local people agree this is an ongoing frustrating situation that there is no bridge over the railway track, already causing unnecessary pollution and congestion. The increased number of homes will only add to this or create more traffic through the village of Brimpton.</li> <li>• <b>Flooding</b>; in 2007 1000 homes were flooded in Thatcham, Aldermaston and Woolhampton, at this point the Kennet Heath was in the early stages of development and the homes that had been built were all flooded since then a number of homes have been built on the site and further homes built along the canal. I know the Environment Agency has made vast improvements to help avoid further flooding, however they are not miracle workers, adding approx. 2 Sq miles of concrete/housing estate onto hillsides leading to a valley that has history of flooding is madness. The current river levels are high and more rain is due. The increased level of water will also affect the villages of Woolhampton and Aldermaston, not to mention the areas of high risk, such as Wargrave as the Kennet joins the Thames.</li> </ul> <p>As stated this week by the Environment Agency. See below.</p> <p><b>River Kennet from Thatcham down to Reading</b></p> <p>Flooding is possible - be prepared</p> <p>Property flooding is not currently expected. River levels remain high, but are beginning to fall on the River Kennet as a result of previous heavy rainfall. Flooding of low lying roads, paths and land is expected to continue, especially in the Theale area. The forecast is for showers overnight and into tomorrow (2/2/21). We expect river levels to remain high over the coming days. We are closely monitoring the situation. Our incident response staff are in the area clearing trash screens. Please remain safe and aware of your local surroundings, avoid using low lying</p>	<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>The NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places. It highlights this should be achieved by making places which are safe and accessible, so that crime and disorder, and the fear of crime, do</p>

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	<p>footpaths near local watercourses, and refer to the 'River and Sea levels in England' webpage for current river levels. This message will be updated tomorrow, 2/2/21, or as the situation changes.</p> <p>This information was last updated at 8:23pm Monday 1 February 2021</p> <p><a href="https://flood-warning-information.service.gov.uk/target-area/061WAF22LowerKen">https://flood-warning-information.service.gov.uk/target-area/061WAF22LowerKen</a></p> <ul style="list-style-type: none"> <li>• <b>Crime rate;</b> Extending Thatcham to Upper Bucklebury will mean Upper Bucklebury is no longer a rural community, as the study shows (see link below) the increase in crime is by far higher in urban communities.</li> </ul> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912406/Crime_August_2020.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912406/Crime_August_2020.pdf</a></p> <ul style="list-style-type: none"> <li>• <b>The disadvantages of large housing estates;</b> a number of gangs are created amongst the youth stemming from living on the same housing estate. Often fighting with gangs on neighbouring estates, there is already a known gang in Thatcham calling themselves the Thatcham Posse, by adding a large new estate to a town means that young families move on to the estate at the same time. Meaning the young children grow to teenagers and young adults at the same time, which has a high probability of gangs forming. Look at the recent gang and knife crime in Tilehurst, which was once a rural village.</li> <li>• <b>The Level Crossing Thatcham;</b> this level crossing already causes congestion, inconvenience and unnecessary pollution to the residents of West Berkshire, adding such a large development to the area will further this.</li> <li>• <b>Local resources;</b> the plan states that an additional school and surgery will be included in the development, however at what stage will this be added to start the development will require the</li> </ul>	<p>not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas. The suite of policies within the Local Plan are designed to ensure sustainable communities are created.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The longer term impacts of the Brexit legacy are currently unknown. The West Berkshire Local Plan Review will be produced in accordance with the UK's government's latest policy and legislative position.</p>

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	<p>first stage of residents requiring immediate schooling and surgeries and therefore oversubscribing the existing resources, or building new ones starts both resources as undersubscribed and failing.</p> <ul style="list-style-type: none"> <li>• <b>Current climate;</b> when the plan was originally proposed the current pandemic and the implements of leaving the EU were not current, therefore the proposal is out of date. As our borders have been tightened we will not see the same influx of foreign nationals residing in the UK and a number of foreign nationals have returned due to the pandemic and the change in border control.</li> </ul>	
Edward Holloway (lpr1476)	<p>I am concerned about the Local Plan Review 2020 -2037 and in particular the plan to build 2,500 houses on land between north Thatcham and Upper Bucklebury (the Policy SP 17 "North East Thatcham Strategic Site Allocation").</p> <p>I cannot support your plan.</p> <p>It will join Thatcham to Bucklebury, damage the character of Bucklebury, result in increased traffic on the small rural roads that cross and surround Bucklebury Common and put considerable pressure on the AONB thereby affecting both wildlife, the environment and the cultural integrity of the area.</p> <p>I understand the need to provide additional housing and support that requirement. It would surely be more sensible however, to build on brownfield sites such as those in Theale and on the Greenham Common airbase site.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Gary Clarke (lpr697)	Specially Thatcham SP17	Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply,

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	<p>A development on this sight was rejected as recently as 2017.</p> <p>The development is outside the centre of Thatcham and there is a serious mismatch between housing and economic strategies. A mismatch that will result in undue strain on infrastructure given the increased commuting that will be needed. This development is therefore unsustainable and inappropriate in direct conflict with the environmental goals outlined in section 3.5.</p> <p>A Council led plan to rejuvenate Thatcham Town Centre rather than a developer led plan to build on greenfields. Once a strong plan is in place for Thatcham then and only then can new housing in the area be considered.</p>	<p>adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p>

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Sarah Jones (lpr1478)	<p>I would like to add my objections to the proposed building of 2500 homes to the north of Thatcham.</p> <p>I do not believe that this is a good idea. There will be an increased demand on the roads, schools and doctor's surgeries. Those services already are stretched beyond capacity.</p> <p>Whilst I understand there is a need for additional homes within the West Berkshire area, I do not believe that this is the correct plan.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part</p>

Respondent (with lpr ref)	Response	Council Response
		<p>of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p>
Name Supplied (lpr1501)	<p>As a resident of Upper Woolhampton (address below), I wish to register my objection to the proposed development of the above sites for the following reasons:</p> <ol style="list-style-type: none"> <li>1. I was made aware of this application/ consultation by neighbours in Bucklebury and have not received any information or correspondence from West Berks Council (WBC). WBC are in my opinion negligent in this process. To make it a fair process, the consultation period should be extended and ALL residents should be formally written to, included and invited by WBC to comment.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. The vision and plan uphold Bucklebury as a rural village community, for the village to remain a predominantly rural AONB. That there is no wish amongst residents to allow growth to change the character and nature of our historic, rural community identity. This document is approved and agreed with WBC and should be included as supplementary planning consideration – yet it is not mentioned in the WBC documentation!?</li> <li>3. In the NWN the following statement is attributed to Hilary Cole. The council's executive member for housing, Hilary Cole (Con, Cold Ash</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and Chieveley), has said: “We are very keen to work with the local community because it’s such a big proposal and development for Thatcham.” However, WBC have clearly not made good enough attempts to engage with local residents – see above points 1 and 2.</p> <p>4. Loss of village identity. There is simply not enough space between the proposed development and Upper Bucklebury and the boundary of the AONB. The village will practically be part of Thatcham (or the Newbury/Thatcham conurbation) and stands to lose its identity as a village. The proposal would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”. WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <p>5. Unacceptable impact on our AONB. According the gov.uk, an AONB has to a combination of several criteria, two of these are:</p> <ul style="list-style-type: none"> <li>· relative wildness, such as distance from housing or having few roads</li> <li>· relative tranquillity, where natural sounds, such as streams or birdsong are predominant.</li> </ul> <p>Both of these points stand to be significantly impacted by such a massive nearby development and may no longer be able to be met.</p> <p>6. Increase in traffic pollution and hazards by Bucklebury Common. I moved next to Bucklebury Common to live in the countryside and be away from car, light and noise pollution. Over the 7 years or so I have</p>	<p>development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>lived in Upper Woolhampton, we have already noticed a significant increase in traffic on Carbinswood Lane by Bucklebury Common. The introduction of such a huge development to the area would necessarily increase traffic pollution, cause additional road hazards ( neighbours have sadly lost dogs on the road, hit by cars and local wildlife, including snakes, have been run over) and cause significantly more disturbance to the residents and nature, on what are rural country unmarked roads and lanes. The pothole situation on the back roads is already bad and would only be made worse with more traffic.</p> <p>7. Increase in traffic on the route into Thatcham and Newbury and towards the station, which are already heavily congested at busy times. When there are even minor traffic delays/congestion on the main roads, drivers resort to the rural routes which are simply not designed for these increased traffic volumes. An increase in houses in the area stands to significantly increase the traffic volume on our rural roads that are not designed for any increase in traffic volume (nor should they ever be!)</p> <p>8. Increase in traffic and increased potential of speeding through Upper Bucklebury, which is of a major concern due to the primary school and many family residents with children (and pet dogs/ cats). With an increase in traffic, which could be as much as 10%, this will only worsen the situation.</p> <p>9. Impact on Nature. We have seen a number of protected species including the great crested newt, adder, slow worm and bats in and around Bucklebury Common. There are also birds such as the nightjar, which are under conservation concern. We fear increased numbers of cars and people visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this needs to be protected and not put under more threat. The development to the south of Blacklands Copse and Harts Hill Copse will mean open space dramatically reduced and wildlife forced to retreat, adding more pressure on species in decline. Over the last 7 years we have seen a significant increase in the litter in and around the Common and fly tipping in the area. Bringing</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>significantly more people to the area stands to cause more problems like this and more damage to what is already a fragile ecosystem.</p> <p>10. The proposal is an over development of the countryside of rolling hills and farmland and also stands to overdevelop Thatcham. This proposed over development is out of character for the area plans and will have a detrimental impact for the town itself as well as the surrounding villages. Thatcham is at capacity as it. Pre-covid, it was often hard to find a parking space in the town centre, doctors/dentists are apparently stretched, there's limited parking at the train station and already almost full train services at peak times into London. Not to mention the traffic delays around the crossing. There is no evidence that the development will enhance Thatcham town centre (or indeed Newbury).</p> <p>11. A previous application was resoundingly rejected by the secretary of state in 2017  <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>.  Why, only a few years after this, are WBC now considering this site in light of the previous rejection, what has changed? Knowing a smaller planning application has been refused once and that there is clearly significant local objection again, why have massive funds been spent pursuing it?</p> <p>12. Why have WBC and Thatcham council used a great deal of tax payers money in completing many surveys and writing an 800 page report, before going to consultation on the proposal?</p> <p>13. The proposed development will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</p> <p>14. It is stated/assumed this will help the Upper Bucklebury Business –</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the</p>

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	<p>predominantly the Pub and Shop. One pub and shop is hardly justification for a development this size. One thing we love about living in Bucklebury is that there is only one shop and one pub where the community enjoy getting together.</p> <p>15. Bringing more houses and cars to the area will significantly increase the noise and light pollution to a predominantly rural, peaceful area where people live to escape from developments like the one proposed.</p> <p>16. The HELAA was updated in December 2020 to take account of factual inaccuracies. What evidence can WBC produce to prove everything stated in the consultation document is still factually correct?</p> <p>17. Schooling – this will obviously have an impact on local schools (and traffic). Many local families are very concerned that the proposal could overwhelm the brilliant local village schools that currently attract a good number of pupils and maintain a good balance of class sizes. Just because the plans include new schools, it does not mean that new families moving to the area will necessarily choose them. Many may well prefer to try for places at the existing, sought-after, traditional village schools, causing increased class sizes, over-stretching of school resources, increased cars, traffic, people and disruption to small rural villages.</p> <p>18. West Berkshire declared a climate emergency on 2 July 2019. <a href="https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000">https://www.westberks.gov.uk/media/48362/Draft-Environment-Strategy-2020-2030-Summary-document-January-2020-/pdf/WBC_Environmental_Strategy_Summary_A4_20.pdf?m=637141844400230000</a> WBC - Environment Strategy - with declaration of climate emergency. Building 2500 new houses will certainly increase the WBC carbon footprint and goes against the emergency/accelerated goal of carbon neutrality and "protecting and enhancing our natural environment" P5. Increased pollution will certainly be created by the entire</p>	<p>improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>The LPR needs to be justified and based on a robust evidence.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as</p>

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	<p>construction process, increased light pollution from the development and more cars will bring increased vehicle pollution and noise pollution to our rural area. There are seemingly NO environmental advantages of building a massive development in rural area. A large development can only bring negative environmental impact and therefore goes against the intent, statement and purpose of the WBC environmental strategy.</p> <p>19. The plan suggests the provision of a “country park”. There appears to be no budget available for this?</p>	<p>air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>The LPR will be revised and updated in response to consultation and the evidence base will be maintained.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul>

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		Any development site will have to comply with the aims and objectives of the plan.
Corrine Bertrand (lpr1502)	<p>I would like to register my reasons for objecting to the proposal to build an enormous housing estate to the northeast of Thatcham (Policy SP 17)</p> <ol style="list-style-type: none"> <li>1. In the last 40 years we have seen Thatcham grow from a small village into a sprawling dormitory town with less diversity of shops than it had and a serious lack of amenities despite the doubling of its population (from 15,000 to 28,000 people).</li> <li>2. The proposed site is adjacent to an AONB. The designation of such an area by Natural England requires that it have relative wilderness, such as distance from housing or having few roads and relative quietness where natural sounds such as streams or birdsong are predominant. Obviously housing on such a scale would ensure that neither of these criteria still pertains.</li> <li>3. Harts Hill copse and Bucklebury common are havens for wildlife and oases for the people who live in or visit them. The increase in population would put an enormous strain on these invaluable and all too rare areas.</li> <li>4. Ironically as I sat down to write my objections, I received a flood alert warning from West Berks Council. Thatcham is in a flood plain. Global warming is making flooding a regular occurrence throughout the country and this area is no exception. Building several hundred houses on a slope right above dense housing is condemning those occupants to regular flooding and untold misery.</li> <li>5. At a time when the governments of the world are finally admitting that the destruction of countryside imperils all of us, it is a foolhardy plan to build on this green field site.</li> </ol>	<p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It's time to reinvigorate town centres by repurposing commercial property not destroy what few green spaces we have left.</p> <p>In conclusion, I beg you to reject this housing plan immediately. Should it go ahead the enormous damage to our area would be irreversible.</p>	<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p>
Chris Weedon (lpr1503)	<p>As a resident of Burdens Heath in Upper Bucklebury I would like to strongly register my OBJECTION to the proposed full development of the above sites for the following reasons.</p> <ol style="list-style-type: none"> <li>1. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> <li>2. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”.</li> <li>3. A previous application was rejected by the Secretary of State in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far?</li> <li>4. It is a massive over development of the countryside in one area which consists of rolling hills and farmland. The reason stated is that</li> </ol>	<p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the</p>

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	<p>85% of West Berkshire is AONB. WBC has previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</p> <p>5. It will have a significant impact on traffic in the area and especially on the route into Thattham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <p>a. This will significantly impact the freight traffic using the industry site at Thattham</p> <p>b. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</p> <p>6. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation. Traffic in Upper Bucklebury increases considerably each time there is disruption on the A4 and the development will significantly increase traffic, especially during the morning rush hour as pupils from the village walk to school.</p> <p>7. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thattham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain. Why build on an area where flood alleviation has already been installed to protect Thattham residents?</p> <p>8. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury. There will also be decades of disruption through the construction phase.</p> <p>9. There is no evidence that this will enhance Thattham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>10. Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. Will</p>	<p>improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thattham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thattham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thattham for housing.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thattham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thattham to the AONB.'</p>



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	<p>these be built before or after the houses? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p>

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		In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.
Claude Hargreave (lpr1504)	<p>I object to the proposal to zone the land fronting the A4 and along Floral Way, Thatcham for residential development. The proposal is to create 2,500 new houses is not sustainable given the size of Thatcham. While Government policy is to encourage house building I believe that zoning the proposed land for such a substantial residential development is contrary to planning policy; Policy DC 1 – There is a presumption against new development outside of adopted settlement boundaries.</p> <p>Highways</p> <p>There will be significant increase in traffic movements on the existing road network which will inevitably force a percentage of the existing and increased traffic onto the surrounding minor country roads. This will create additional pollution, congestion and increase the chances of accidents on the smaller roads. While the land proposed for zoning is easy accessible to the public transport network it will lead to additional traffic movements during peak hours. The local roads are already congested during peak hours and more traffic will make it worse.</p> <p>Landscaping</p> <p>The land identified for zoning is currently open county side and any development will impact the AONB settlement pattern. The Bucklebury Plan states that a green belt is to be maintained between Thatcham and upper Bucklebury. Today there is a significant buffer zone between upper Bucklebury and Thatcham. However, this will be significantly eroded notwithstanding the proposed nature park if the land use plan</p>	<p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR). The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there</p>

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	<p>change goes ahead. Even if the proposed nature park is 10% of the total development area it is contrary to the concept of greenbelt.</p> <p>Flooding</p> <p>Any development will impact the water runoff from the hillside increasing the chance of flooding.</p> <p>Ecology</p> <p>The land in question is open county side and must be protected from over development.</p> <p>Consultation</p> <p>The consultation period should be extended to allow for engagement with the local residents. The emerging local plan consultation has not been widely published which does not follow policy as no effort has been made to directly contact local residents for feedback.</p>	<p>were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning</p>

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		<p>proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>
Dave Parsons (lpr1508)	I would like to strongly object to the proposed North East Thatcham Strategic Site allocation (Policy SP 17) as per your Local Plan Review 2020-2037 Emerging Draft December 2020.	The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual

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	<p>I outline my main objections as follows:</p> <ol style="list-style-type: none"> <li>1. Loss of identity of Upper Bucklebury.</li> </ol> <p>As a resident of Upper Bucklebury this concerns me greatly. The proposed development would end up incredibly close to Upper Bucklebury and would reduce if not remove the rural aspect of this village. The Bucklebury Vision and Plan detail that a strong greenbelt should be maintained between Upper Bucklebury and Thatcham. These documents were approved by WBC.</p> <p>Additionally, the Siege Cross proposal was refused by WBC because of similar concerns. The reason WBC gave for refusal included: (taken from the WBC Decision notice to refuse outline planning):</p> <p><i>3 (c) The proposed development would result in harm to the character and identity of Thatcham and erode the open landscape between Thatcham and Upper Bucklebury.</i></p> <p><i>3 (d) The development would have an adverse impact on the distinctive local landscape character and appearance of the landscape north of Thatcham, which contributes to the setting of the AONB the boundary of which runs some 575 metres to the north of the site.</i></p> <p>It is extremely concerning that WBC now considers this loss of identity acceptable. I.e.: recommendation from Site Assessment on CA16:</p> <p><i>Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thatcham in the period to 2037 particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.</i></p>	<p>breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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	<p>In haste to find a single convenient solution it seems that it is acceptable that villages should lose their separate identity and all merge together. Where does this stop? Why not merge all villages and towns together and be done with it? Such a narrow-minded attitude is short-sighted and abhorrent.</p> <p>2. Increase In Traffic</p> <p>The area around Upper Bucklebury comprises a number of single-track lanes. With an influx into the area of potentially 5000 cars the traffic using both the main road through Upper Bucklebury and the single-track lanes would significantly increase. This would have an ensuing knock-on safety effect of excessive speed through the village, increased danger to children walking to the primary school in Upper Bucklebury, and increased risk of car accidents as there is greater use of single track lanes. There is also the increased pollution from the increased number of vehicles using these country roads.</p> <p>The plan states that one reason for this location is its proximity to the Thatcham train station. It is most likely that the increase in this use will be by people driving to the train station. There is already insufficient parking at the Train Station for the existing number of commuters. Even with a modest 10% of people from 2500 new homes would represent a significant increase in the local parking pressure around the station leading to further illegal parking, irate local residents and increased danger to pedestrians. Further, I see no provision in the plan for a bridge over the rail tracks at Thatcham Station. This is already a severe bottleneck and the increase in a large number of vehicles using this route will result in even further chaos and inconvenience, not to mention the increase in pollution through the larger number of cars idling waiting to cross the train tracks.</p> <p>3. Overloaded Doctor's Surgeries</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>The surgery at Chapel Row is already heavily subscribed. It can take a number of weeks to get an appointment. I understand that this is one of the 2 surgeries that would fall within the catchment for the proposed development. The overloading of this and presumably the other surgery in Thatcham would have a large-scale negative effect on the people who need the surgery most as they further struggle to gain and maintain contact with their local GP.</p> <p>4. Loss of Nature and Further Threat to Pollinators</p> <p>This proposal means to remove a large amount of rolling hillside with its encompassing hedgerows and nature's highways. This will have a direct negative effect on the amount of native flora and fauna. Rather than concreting over large swathes of countryside we should be working with farmers and land owners to promote the National Pollinator Strategy. Pollinators are an important part of our environment yet are in decline. Over 97% of all flower-rich grasslands have been lost in England since the 1930s, reducing pollen and nectar sources and leading to a serious decline in the wildlife depending on wildflower-rich habitat. Pollination by honey bees, wild bees and bumblebees is incredibly valuable for farmers. It is estimated that it would cost UK farmers £1.8 billion a year to pollinate their crops manually if wild bees disappeared. We should be promoting nature not destroying it.</p>	<p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Peter West (lpr720)	<p>I think Thatcham is already over-developed. Many people prefer to live in Thatcham over Newbury because it is smaller, quieter, has less bustle and less traffic away from the A4. Adding an extra 2500 dwellings would fundamentally change Thatcham for the worse. I want Thatcham to retain its 'large village' atmosphere.</p> <p>I also disagree with the findings of the 2020 Thatcham masterplanning study - this is the first I've heard of it.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>



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	<p>I have also commented on the Review of Settlement Boundaries at Appendix Three. These comments form part of the reasons why I am objecting to the proposed policy.</p> <p>I consider north east Thatcham – the area shown on the plan - is not a suitable location for strategic large scale development. It is too far away from the centre of Thatcham and will lead to large numbers of extra car journeys on Floral way, Harts Hill Road and on the A4 through Thatcham.</p> <p>Large areas of existing housing – particularly streets off Floral Way (e.g. Foxglove Way, Trefoil Drove, Simmons Field, Archangel Way) and streets off Falmouth Way (e.g. Bolingbroke Way, Ashman Rd) would be subjected to 15 years of noise and disruption from building work and roadworks.</p> <p>If any area of Thatcham needs to be examined for further development, it should be in the south east quadrant, south of the railway line. Because some of this land is in a flood plan, areas slightly higher up Crookham Hill - land around Highfield and Waterside copses - should also be considered. A development in these areas would be closer to Thatcham rail station and a similar distance to the existing town centre as the north east sector proposed housing. There would be less intrusion - building noise, roadworks etc - to existing housing. Any development plan for the south east quadrant could also deliver the one piece of infrastructure urgently needed in Thatcham - a road bridge over the railway at Thatcham Station.</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p>

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		<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site. With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Sandra Parker (lpr726)	<p>I think Thatcham is already over developed.</p> <p>The proposed development is outside the settlement boundary. This area is open farm land which is much appreciated by local residents.</p> <p>This proposal will mean years of disruption, noise and pollution for local residents.</p> <p>The one piece of urgent infrastructure Thatcham needs is a bridge over the railway line. Not only will this development not provide this but it will</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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	<p>make it an even bigger problem as there will be increased traffic using this route.</p> <p>smaller developments</p> <p>no change to settlement boundary</p> <p>retain fields and open countryside</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thattham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thattham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thattham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thattham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p>

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		<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thattham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thattham to the AONB.'</p>
Neil Rendall (lpr1506)	<p>I strongly object to the proposal for the addition of 2500 dwellings in the NE Thattham area SP17 on the following grounds.</p> <ol style="list-style-type: none"> <li>1. Thattham has, over the last 15-20 years been the site of greatest development of any area in Europe. Please now let it rest and allow the infrastructure to catch up.</li> </ol>	<p>Thattham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thattham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thattham should be a location to consider for additional housing, in any review to</p>

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	<p>Consider for example Hungerford, which in 2011 had a population of 5700. Certainly something more than that now, but if 2500 houses between Thatcham and Bucklebury were to accommodate the national average of 2.4 persons per household that would number 6000.</p> <p>To impose a market town the size of Hungerford between Thatcham and Bucklebury would be an intolerable, horrendous imposition on the existing communities of Thatcham and Bucklebury, and surrounding villages.</p> <ol style="list-style-type: none"> <li>2. Thatcham and Upper Bucklebury are two distinct settlements of entirely different character. Merging them would be devastating as that of Upper Bucklebury would be lost altogether. The expansion to Floral Way has brought the boundary of Thatcham significantly closer to Upper Bucklebury such that it's limited and fragile infrastructure is compromised.</li> <li>3. 10 years ago it was established with planners and developers that Floral Way was the new boundary between Thatcham and Upper Bucklebury and it would not be breached. This cannot be disregarded and thrown out after just 10 years.</li> <li>4. I notice some 'parkland' included in the plans. Modern thinking is now very much in favour of 'wilding' for healthy flora, fungi, fauna, insects etc. for the good of <u>everyone</u>, beyond just the local area. Manicured, maintained, planted parks whilst providing essential outside space do not provide the outside spaces that are good for everyone and everything. Land that is just left to its own is required. Agriculture, traditionally and sensitively carried out is better for the whole country than parks.</li> <li>5. Whilst the areas under consideration are outside the North Wessex Downs AONB it's very close proximity to the AONB seriously and devastatingly imposes on that area such that it erodes its whole purpose as an AONB.</li> <li>6. A paragraph in the Stage 3 report page 20 states:</li> </ol>	<p>accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.' The Council is clear that development on the site will be</p>

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	<p>"2.4 At a strategic level, the site extends Thatcham linearly along the Kennet Valley, continuing the broad pattern of development that the town already exhibits due to the topography, connectivity and water."</p> <p>This is blatantly untrue. The site in question <u>broadens</u> the pattern of development of Thatcham up and out of the Kennet Valley and ever closer to other settlements.</p> <p>7. Page 15 Ref: "1.27 By addressing these issues positively and transparently, any proposed strategic development in the town has the potential to deliver net benefits for the town as a whole."</p> <p>Any benefits to Thatcham here would be at the expense of all life, including human life, in Upper Bucklebury.</p> <p>And, when existing infrastructure in Thatcham is already stretched its nonsense to suggest that adding demand will improve it. We've waited for too long for the present shortage of infrastructure to be addressed and have been severely disappointed. The infrastructure I refer to is provision for traffic on A4, Floral Way, through the parish of Bucklebury, over the railway crossing by the station, station parking, doctor's surgery, schools and public transport to name just a few.</p> <p>Stage 3. Page 58 under Extending Linear Town Structure mentions opening a North Eastern Approach to Thatcham through the development of THA20. So here is open confirmation of the intention to send yet more traffic through the country lanes of Bucklebury, which already have to accommodate rat-running traffic avoiding the A4/Floral Way bound for M4/Reading in the East and Newbury/Chieveley/M4 in the West.</p>	<p>landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual</p>

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	<p>It also mentions "extending facilities to a wider catchment." Clear indication here of an attempt to join Bucklebury to Thatcham.</p> <p>8. "2.47 It should be noted that the North Wessex Downs AONB Board has stated its objection to development on all the sites that make up NE Thatcham, through the HELAA process, due to the impact on the setting of the AONB and the breaking of the Floral Way boundary. The location of the North Wessex Downs AONB is shown on Figure 30. <u>Although the site is proximate, due to the topography and woodland cover, there is little intervisibility between the two unless an appropriate buffer is included in any proposals.</u>"</p> <p>Bucklebury Common already has too much pedestrian and vehicular traffic (4x4s) for the healthy survival of the existing flora and fauna. The proposed development would considerably to this damage in terms of foot and wheeled traffic, noise and light pollution and air pollution. This at a time of unprecedented environmental damage throughout the world causing climate change.</p> <p>9. On page 62 you write: "NE Thatcham has the potential to accommodate:... • Biodiversity net gain through habitat restoration and linkages".</p> <p>This comment is disingenuous. Any tarmac, concrete, bricks and mortar can only harm biodiversity.</p> <p>10. This proposal is ill thought out and considerably out of date with current thinking and statistics.</p> <p>Please preserve and conserve the special qualities of N Wessex Downs AONB and Bucklebury Common/Parish by keeping the existing buffer above Floral way entirely free of development.</p>	<p>representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will</p>

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		<p>be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



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<p>Joshua Parsons (lpr1507)</p>	<p>I would like to register my objection.</p> <p>I want to keep Bucklebury rural. I have lived in Upper Bucklebury all my life and love the fact it is rural and there is lots of wildlife in the surrounding area. I'm worried that the development would harm the environment. The increased population would lead to an increase in litter being accumulated in the surrounding forests which would harm the environment and animals which live there.</p> <p>I currently attend Kennet school and the road going to Thatcham would not be able to take the amount of traffic that the increased population would present. The traffic would also increase harmful emissions.</p> <p>Living in a village is quiet and I know most of the people. People help each other and there are community events. The increase in houses may change this forever.</p> <p>I have memories of walking across the fields into Thatcham. The views are nice and there is lots of nature. E.G Deer, flowers, bees etc. These would all be threatened with the new development.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>

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		<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
Sheelagh Lewis (lpr1509)	<p>I wish to object to the Planning of 2500 new homes between Upper Bucklebury and Floral Way.</p> <p>Objections:</p> <ul style="list-style-type: none"> <li>• Danger of over development in the area</li> <li>• Loss of rural countryside</li> <li>• Impact of traffic via Bucklebury and local areas</li> <li>• Loss of green belt areas</li> <li>• Increased pollution</li> <li>• Public transport (which is lacking now)</li> </ul>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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		<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant</p>

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		<p>impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Cheryl Gadsby (lpr1511)	I am particularly concerned about the increase in traffic through Upper Bucklebury if such a large development is built either side of Harts Hill. The plan specifies in SP22 7.17 that “particular focus should be	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period.

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	<p>given to safety of pedestrians, cyclists, equestrians and other vulnerable road users”.</p> <p>I live on &lt;personal information removed&gt;, which is already used as a through-route for cars from Thatcham coming up Harts Hill and driving through Burdens Heath to access the A34 and M4 through Cold Ash and Courage beyond. Burdens Heath does not have a pavement, only a ditch running along the side of the housing. There is no street lighting. Cars will regularly exceed the 30mph speed limit. There are many families that live along this road and it is used as a walking route to access the village primary school and the buses to take secondary school age children to Kennet school and The Downes School. This means that, particularly in the winter months, there can be children walking along the road in the half-light at the beginning and end of the day. We already have issues with cars not taking enough care or consideration of pedestrians and the increase in traffic will only make this situation worse.</p> <p>I note that in SP22 7.18 there is a plan to encourage more travel choice with car sharing and use of links to the train station. However, many new residents may see the town as a good base for Northern or Western routes given the close proximity of the M4 and A34. These residents will be likely to use their cars and will use Upper Bucklebury and the surrounding villages as a short cut to these major roads. This will only increase the issue of traffic in villages not designed for this purpose.</p> <p>The scale of the proposed development in one location will lead to traffic issues in the surrounding areas and will impact the local villages. My preferred approach would be for planned developments to be spread out across West Berkshire, rather than proposing to build 2500 dwellings in one location.</p>	<p>Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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<p>Charles Darling (lpr1510)</p>	<p>I am objecting to the proposed building of 2500 homes between Bucklebury and the A4 and Floral Way, Thatcham.</p> <p>The traffic along the A4 is already congested and at times at a standstill and as a result surrounding roads often single track roads are becoming clogged by motorists seeking alternative routes.</p> <p>The infrastructure is already at bursting point and your quick fix solution is ill conceived and will have repercussions for people who were once rural and now find themselves living in the suburbs.</p> <p>At the very least a more up to date feasibility study needs to be undertaken due to the current changes in the needs and working practices of the region.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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		A Viability Assessment will accompany the LPR as part of its evidence base.
Chris Harris (lpr1513)	<p>This email sets out my <b>objection</b> to the proposal to North East Thatcham Development - Local Plan Review 2020 – 2037: Emerging Draft, on the following grounds:</p> <p><b>Traffic</b></p> <p>We live in &lt;personal information removed&gt; and walking to the school with our 2 small daughters is, at the moment dangerous. The cars travelling down Burdens Heath are constant and well above the 30mph limit. Almost every day we witness a near miss as cars fail to slow for walkers, cyclists and horse riders.</p> <p>This is the same for Broad Lane with the traffic calming failing to do much. Every morning on the way to school it is concerning. We fear with any increase in traffic the village will become unbearable and dangerous. It will not be long until a dreadful accident happens.</p> <p>The proposed development will increase considerably the traffic in Upper Bucklebury and the surrounding villages.</p> <p><b>Nature</b></p> <p>Bucklebury Common and the surrounding area is rich in flora and fauna and we witness it daily in the Burdens Heath Planation area as well as on the common. We have seen a number of protected species including the great crested newt, common lizard, adder, grass snake, slow worm and bats. There are also birds such as the nightjar (we believe last summer was in the burdens heath plantation area as well as on the common) which are under conservation concern. We fear increased amounts cars and people visiting the area of outstanding natural beauty will have a large negative impact. Wildlife like this need</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed</p>

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	<p>to be protected and not under more threat. The development to the south of Blacklands Copse and Harts Hill Copse will mean open space dramatically reduced and wildlife forced to retreat, pushing species into decline.</p> <p>There is already too much litter and fly tipping in the area, as well as car parks being used after dark for illegal drug use. This will only increase and damage the fragile ecosystem</p> <p><b>Identity</b></p> <p>There is simply not enough space between the proposed development and Upper Bucklebury. There should be clear space between settlements which would be lost with this development and Upper Bucklebury will become part of the Newbury/Thatcham conurbation. Residents have chosen to live here for many reasons, and being part of a rural village community is one at the very top of the list.</p> <p><b>AONB</b></p> <p>According the gov.uk, an AONB has to a combination of several criteria, two of these are:</p> <ul style="list-style-type: none"> <li>• relative wildness, such as distance from housing or having few roads</li> <li>• relative tranquillity, where natural sounds, such as streams or birdsong are predominant</li> </ul> <p>Both of these will be impacted heavily by the development and could not be met. We would imagine the boundary of the AONB would have not been where it currently is should this development already have been in existence. The development is threatening the protection of the</p>	<p>submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>



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	<p>AONB, which is against WBC’s own strategic objective to “...conserve and enhance the North Wessex Downs AONB.”</p> <p><b>Night Skies</b></p> <p>The area already suffers from considerable light pollution from Newbury and Thatcham. This development would make it so much worse and upset wildlife habitats. It would damage the night skies we enjoy as residents of the village.</p> <p><b>Pollution</b></p> <p>The A4 is relatively close to Upper Bucklebury, and the noise and air pollution is already felt in the village, the new development would further increase noise and air pollution making the village not such a nice place to live.</p> <p><b>Landscape</b></p> <p>The development would be out of character for the landscape. Currently the beautiful fields, hills, ancient woodlands and historic sites enrich the environment, both for residents of Thatcham, Upper Bucklebury, Cold Ash and their visitors. The proposed development would have a detrimental impact on the landscape which is against Bucklebury’s and WBC vision and objectives.</p> <p><b>Overdevelopment</b></p> <p>The proposal is overdevelopment of Thatcham, is out of character for a small town and will have a detrimental impact for the surrounding villages as well as the town itself. Thatcham struggles as it is. There is insufficient parking in the town, doctors stretched, limited parking at the</p>	<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p>

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	<p>train station and already almost full train services at peak times into London. Not to mention the traffic delays around the crossing</p> <p><b>Flooding</b></p> <p>Thatcham has suffered from serious flooding, a member of our family's house being flooded in 2007 alone with so many others. Having read the Strategic Flood Assessment (SFRA) Level 2 report by Jacobs in 2008 it is of grave concern that this area will be developed and increase the flood risk to Thatcham and Newbury. I appreciate that the developers will be required to put mitigation in place, but in reality, we expect this to be insufficient.</p> <p>I strongly urge you to reconsider the plans, reducing the development or finding alternative site that are more suitable and in line with WBC's own policies.</p>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the</p>

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		<p>Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements</p>
Sarah Harris (lpr1516)	<p>This email sets out my <b>objection</b> to the proposal to North East Thatcham Development - Local Plan Review 2020 – 2037: Emerging Draft, on the following grounds:</p> <p><b>Traffic</b></p> <p>We live in &lt;personal information removed&gt; and walking to the school with our 2 small daughters is, at the moment dangerous. The cars travelling down Burdens Heath are constant and well above the 30mph limit. Almost every day we witness a near miss as cars fail to slow for walkers, cyclists and horse riders.</p> <p>This is the same for Broad Lane with the traffic calming failing to do much. Every morning on the way to school it is concerning. We fear with any increase in traffic the village will become unbearable and dangerous. It will not be long until a dreadful accident happens.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is</p>

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	<p>the Strategic Flood Assessment (SFRA) Level 2 report by Jacobs in 2008 it is of grave concern that this area will be developed and increase the flood risk to Thatcham and Newbury. I appreciate that the developers will be required to put mitigation in place, but in reality, we expect this to be insufficient.</p> <p>I strongly urge you to reconsider the plans, reduce the development or find alternative sites that are more suitable and in line with WBC's own policies.</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements</p>
Nikki Hart (lpr1518)	<p>I am writing to voice my strong objection to proposed development to build 2500 houses on the farmland between Upper Bucklebury and the A4 and Floral Way.</p> <p>My family and I have become residents of Upper Bucklebury in the last 12 months, moving from near-by Cold Ash where we resided for the previous 13 years. We chose to remain in this location due to our love of the countryside and numerous scenic walks and open spaces on our</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining</p>

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	<p>doorstep. A huge housing development in such proximity will erode the gap between Thatcham and Bucklebury Parish, stripping our community of the rural feel that has played a huge part in attracting many of the residents to this village.</p> <p>A further detrimental consequence of such a development will undoubtedly be an increase in traffic in Bucklebury and the surrounding area. Air and noise pollution go hand-in-hand with an increased amount of vehicles, which will again have a negative impact on local residents in terms of health and living conditions. The road network is not designed to accommodate the flow of traffic that will be unavoidable with such a number of additional residents living a short distance down the hill. Any changes to this existing road system will further cut into green belt areas that are already under huge threat.</p> <p>Any project of such vast proportions is going to have a damaging impact on flora and fauna in the locality. At a time when every effort should be made to protect our local wildlife and preserve areas of countryside for all to enjoy, this development does quite the opposite. It threatens the designated AONB and Bucklebury Common, due to increased footfall and litter and is sadly open to other abuse from unauthorised vehicles.</p> <p>The proposal itself, based on projected housing needs, is unrealistic and overinflated and fails to take into account other housing developments in the Newbury area. There is no need for a project of such size and proportions to be located on the current site. Indeed, it will lead to further on-going issues of flooding due to the amount of run-off water from so many buildings crammed together.</p> <p>I am in complete agreement with many other residents of Bucklebury and the surrounding villages that this development should and must be reconsidered.</p>	<p>and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed</p>



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		<p>submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

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		<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for 5% additional homes</p> <p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>
Gordon Heslop (lpr1519)	<p>I am writing to oppose the proposal to develop the area North East of Thatcham for housing, particularly the proposal to develop up to 2500 homes at site THA20, incorporating sites THA6, THA8, THA10 and THA14 as outlined in the Local Plan Review to 2037.</p> <p>I have very significant concerns regarding this development, mainly:-</p> <p>Inappropriate extension of Thatcham into surrounding areas, eroding strategic gaps, particularly to Bucklebury.</p> <p>Inability of Thatcham infrastructure (shopping, healthcare, transport links, schooling) to absorb increase in population.</p> <p>Excessive additional traffic introduced to a local road infrastructure that is already unable to cope with current use, plus the proposal to interrupt the Thatcham relief road in order to serve this development.</p> <p>Grave concerns over surface water run-off, flood control, light, noise and air pollution from a development of this size.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as</p>

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	<p>Particular concern over building on green spaces plus the ensuing impact to Bucklebury Common, the AONB and existing public amenity spaces.</p> <p>It would seem to me that this is a wholly inappropriate place to be considering a substantial development of housing and I would urge a drastic re-think of this proposal.</p>	<p>being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and</p>

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		<p>Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a</p>

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		significant amount of open space which would be expected to serve the new population (and benefit the existing population).
Jodie Stone (lpr1520)	<p>I am writing to object to the proposed development of 2500 new homes in Thatcham. Thatcham is already struggling with its infrastructure with primary &amp; secondary schools. Francis Baily the closest primary school to this proposed development &amp; it is already the biggest primary school in West Berkshire with 600 kids. That's big enough for a primary school.</p> <p>The railway crossing is an absolute nightmare! Total joke, sometimes you could be stuck waiting in queues for 30 minutes. Thatcham cannot take any more traffic from a new development.</p> <p>This proposed development is to be built on more green space, there is hardly any green space as it is, &amp; this has really proved its point during the covid lockdowns, 2020-2021 there is nowhere to walk or exercise as a family away from lots of people because it's already so densely built up, there is really no space.</p> <p>I also think that we need to protect all the wildlife that habitats where you want to build this unbelievably huge development. Surely as Newbury high street is ruined through covid &amp; online shopping these derelict buildings which already exists could be turned into much needed housing as the high street will never recover from this devastating pandemic.</p> <p>I hope you make the right decision as the people of Thatcham (the resident's) do not want any more developments.</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB..</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Gill Foster (lpr1521)	First of all, I would like to point out that you state in the plan that you wish to hear the views of the public yet the Council website seems to hide details about it in a very wordy local plan. The home page does not	In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in

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	<p>mention it and you would only find out about if you knew how to navigate the website. The local plan is last in the list! This simply is not good enough.</p> <p>When you try to log in or register, this is a difficult process and so it feels like the Council are merely doing the absolute minimum in terms of consultation. I have found that many people that I have spoken to recently are totally unaware of the plan to put 2500 new houses in Thatcham.</p> <p>Details of this idea to put an extra 2500 homes in Thatcham should at the very least be on the website home page giving residents clear instructions about how they can give their opinion.</p> <p>The Council needs now to extend the Consultation period and make residents aware of the plans.</p> <p>It may be that the Council thought that selecting this site was the easiest option, putting such a high proportion of the new housing requirement on to one site, but I feel very strongly that if the residents of Thatcham were actually aware of these plans, the vast majority would oppose it.</p> <p>The size of this proposed development is completely out of scale for Thatcham, a massive increase in its population. Thatcham has already had huge amounts of new housing in comparison to Newbury and Hungerford.</p> <p>Thatcham was a village not so long ago and the current infrastructure would not support a development of this size. The towns car parks are generally already full, leisure and sports facilities are limited, doctor's surgeries are at capacity.</p>	<p>the local press and via notification emails to those registered on the Council's consultation database. However, the prominence of the Local Plan on the Council's website can be looked at during the next consultation period.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there</p>

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	<p>This proposed site would mean an extra 5000 cars or thereabouts being on already overcrowded roads.</p> <p>Queues for the level crossing may even stretch back to the A4.</p> <p>As there is limited space for cars to park, I think the local businesses and shops will suffer as people drive elsewhere to shop.</p> <p>The local plan states that development should not increase the flood risk. Concreting over such a large area above Thatcham will surely increase the risk of flooding. With climate change and the vast increase in rainfall, flooding will definitely increase if we develop on farm land to such a huge scale.</p> <p>Our existing flood defences will not be adequate as the situation deteriorates rapidly with climate change and even more extreme weather patterns.</p> <p>It seems that the plan means just more housing of the same as before, a huge, unimaginative estate which we do not want. We need to think and be prepared do things differently now.</p> <p>The local plan wants economic growth but what the Council need to focus on is the climate emergency and only allow a small number of carbon neutral homes to be built in suitable sites ensuring everything in these homes is of the highest standard including the insulation to reduce future energy requirements.</p> <p>Climate change features in the text of the local plan but I am not convinced that the Council has really taken this on board and will ensure developers adhere to the highest green building standards.</p> <p>Finally, I do not quite understand the need for so many houses. I know that the Government gives Councils a fixed number of new houses</p>	<p>were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should</p>



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	<p>to be built but with the birth rate falling in the South significantly why are these needed? Surely we are not drawing in people from other parts of the country?</p> <p>I assume this is because of relationship breakdown and families and other couples splitting up and needing separate homes. Perhaps we should be investing more in relationship education and counselling instead?</p>	<p>contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in</p>

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		<p>national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p>

Respondent (with lpr ref)	Response	Council Response
Victoria Pratt (lpr1523)	<p>I would like to object to the proposed development of 2,500 houses along A4 and Floral Way between Thatcham and Upper Bucklebury for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Infrastructure – There are no plans to improve the infrastructure of the surrounding area. An increase of 2,500 houses will place local infrastructure under significant pressure. <ol style="list-style-type: none"> <li>a. Residents have been asking for a road bridge to replace the level crossing at Thatcham for years, an extra 5,000 cars are only going to make queues worse.</li> <li>b. Thatcham station does not have a big enough car park to support the proposed development.</li> <li>c. Low water pressure is already an issue faced by Upper Bucklebury and Chapel Row. An extra 2,500 homes is only going to place more stress on an already.</li> <li>d. Waste and energy consumption will increase massively – how does this follow West Berkshire Council's declaration of a climate emergency?</li> </ol> </li> <li>2. Amenities – The proposal does not include plans to increase or develop existing amenities in the surrounding areas.</li> <li>3. Flooding – in 2007 Thatcham suffered widespread surface water flooding which affected over 1,000 homes. This led to the implementation of flood defence schemes which have only recently been completed. Already these defences are not being maintained increasing the current risk of flooding. Surface runoff is already prevalent on the agricultural land surrounding Harts Hill. An increase in impermeable surfaces and drainage systems has the potential to increase the risk of flooding in Thatcham and further downstream.</li> <li>4. Traffic – the proposed development will have significant impact on traffic along the A4, through Upper Bucklebury, Southend Bradfield and</li> </ol>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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	<p>Cold Ash. Many of these roads already have issues with speeding and are not designed to handle such an influx of traffic.</p> <p>5. Environment – There is so much nature around Upper Bucklebury and this proposal will hugely affect this. Locally protected species such as the great crested newt, common lizard, adder, grass snake, slow worm, badgers and bats have been seen. There are also birds such as the nightjar which are of conservation concern. I worry that the increased amount of traffic and number of people visiting this area of outstanding natural beauty will have a huge negative impact. Wildlife needs to be protected and not put under threat.</p> <p>6. Corridor between Thatcham &amp; Upper Bucklebury – There is simply not enough space between the proposed development, Upper Bucklebury and the boundary with the AONB. The development will essentially make Upper Bucklebury a part of Thatcham (or Newbury/Thatcham) meaning it will lose its identity as a village. I have spent all my life living in Upper Bucklebury and strongly believe the rural aspect of the village is imperative to protect. According the gov.uk, an AONB has to a combination of several criteria, two of these are:</p> <ul style="list-style-type: none"> <li>• Relative wildness, such as distance from housing or having few roads</li> <li>• Relative tranquillity, where natural sounds, such as streams or birdsong are predominant</li> </ul> <p>Both of these will be impacted heavily by the development and could not be met. I would imagine the boundary of the AONB would not be where it currently is should this development already have been in existence.</p> <p>7. Loss of unspoilt countryside – The entire proposed development is on green field sites and will lead to the loss of the beautiful unspoilt</p>	<p>In regards to water supply, The developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> </ul>

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	<p>countryside between Colthrop Manor, Ouzel Gully and Kent's Down Gully.</p> <p>8. Light Pollution – Upper Bucklebury only has 6 street lights which produce minimal light pollution. The proposed development would drastically increase light pollution locally.</p> <p>9. Health care – Doctors surgeries are already under pressure. And are unlikely to have the capacity to cover some 7,000 extra patients.</p> <p>10. Death Care - The proposal does not address care after death. An increase in population of 7,000+ people will place strain on the crematorium and local cemeteries which are not big enough to cope.</p> <p>11. Rights of Way – There are currently several footpaths and bridle ways over the land proposed to be built on, some of these are ancient pathways. These are vital for local people in Thatcham and Bucklebury to experience the countryside on foot and on horse. 2,500 houses will change these rights of way beyond recognition.</p> <p>12. Schooling – the proposed development will have a huge impact on local schools. Whilst the proposal includes plans to build three schools, when would they be built, before or after the houses? Build them before and it will poach children from local schools leaving them unsustainable but build them after and local schools will be overwhelmed. If the development is spread across West Berkshire there is a much greater chance of the load being spread out.</p> <p>13. Over development - The proposal is overdevelopment of Thatcham, is out of character and will have a detrimental impact for the surrounding villages as well as the town itself.</p>	<ul style="list-style-type: none"> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end,</p>

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	<p>14. Climate Change – West Berkshire declared a climate emergency in 2019. The proposed development will increase pollution through increased traffic, waste, energy consumption to name a few.</p> <p>15. Archeology - Long Grove was originally the principal road through what is now Upper Bucklebury, between Crookham Manor, Colthrop Manor and Bucklebury village and may contain archaeological artefacts requiring a suitable survey. Additionally, there may be a Bronze Age settlement were Harts Hill Copse meets Harts Hill Road.</p> <p>I would like to suggest that multiple smaller developments are built across West Berkshire which would spread the impact on nearby infrastructure. Whilst building 2,500 houses in one development may allow for additional infrastructure, three schools is not sufficient to counter the detrimental impact to the surrounding communities. If this is not possible, I would like to suggest Greenham Common as a more suitable site for development. It has better transport links including main roads and Newbury Station. It is also closer to amenities such as supermarkets, shops and leisure facilities.</p> <p>Finally, it is not a greenfield site so would not result in the loss of uniquely quiet unspoilt countryside.</p>	<p>any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the</p>

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		<p>Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p>
Jasmine Foster (lpr1522)	<p>I am writing regarding the plan to build 2500 houses in NE Thatcham. I am very against this plan, as it would destroy a lot of natural areas and disturb the wildlife that lives Thatcham has some beautiful foot paths and putting houses on these places would destroy and the people who live in Thatcham uses theses foot paths to exercise and there and taking them away how would those people exercise? Adding more house will make an already busy Thatcham a lot busier, double the number of cars on the road, will make park even more impossible as they are full even now! So, adding more will make it more impossible for anyone to park. The economic growth should not be a priority at the moment. As Climate change is a problem adding more houses and cars will increase the emission.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to</p>



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	<p>I had great problem trying to access the information about the plans to build 2500 houses and the council states it wishes to get responses from the public but it is quite different to find those details in the plan. To find how to response is very confusing and is not clear on how to response, that should clear on the home page so people who are not techy will understand, as I think a lot of people would be against it but they do not know how to access where they would need to reply.</p> <p>I am in my 20s and it is exceedingly difficult for me to rent a flat as the prices are high, more houses will make Thatcham more expensive place to live in and people like me would find it even harder to find somewhere else to live as we cannot live with our parents forever and some of us do not want to more away from Thatcham as work, family and leisure is here.</p> <p>Before COVID-19 the doctors where a terribly busy, never able to get the appointment when you wanted it, had to wait weeks for an appointment. Adding more houses will increase the number of people who need to go to the doctor which will make it impossible to even get an appointment. Flooding is a problem in Thatcham we should be putting money in to help existing houses to stop them getting flooded and improving the banks and clearing out where it needs to be cleared out to stop floods recurring as we are getting a lot of rain due to climate change.</p> <p>I am very against the plan to build 2500 houses! Use the money for things we need! We do not need 2500 more houses. We need afforded houses for young people, foot paths for people to walk to from their home to exercise, less cars on the road more people walking and cycling.</p>	<p>conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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		<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a</p>

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		strategic nature at this site would support the service provision and regeneration that Thatcham requires.
Mark Berry (lpr744)	<p>The Colthrop Village Consortium consider that the proposed urban extension to North East Thatcham is flawed for the reasons set out in the letter prepared on their behalf by JSA Architects dated 4 February 2021 along with the associated Technical Note prepared by Stuart Michael Associates on Transport. That letter sets out the reasons fully and we ask the Local Planning Authority to take those comments into account as part of Consortium's comments on this draft Local Plan.</p> <p>Recognise the constraints and inappropriateness of such a large incursion into the countryside. Consider the merits of the Rainsford Farm/former Colthrop Paper Mill site as sequentially preferable.</p>	Comments noted, the consultation response Colthrop Village Consortium will be considered as part of the consultation process.
Susan Burrows (lpr2150)	<p>Please can you advise how Thatcham and its local already overstretched services are going to absorb this number of people? Other points to consider are:</p> <ol style="list-style-type: none"> <li>1. The permanent damage to wildlife and the countryside and the loss of more green space.</li> <li>2. The Green belt between Upper Bucklebury and Thatcham will be lost.</li> <li>3. I believe this area of land is susceptible to flooding.</li> <li>4. Traffic levels will significantly increase as will air and noise pollution. Is the A4 not enough of a pollution hotspot already with high levels of HGVs which have never been dealt with?</li> <li>5. Why has this proposed development not been advertised by WBC?</li> <li>6. This is a huge development that will adversely impact on residents, why is WBC not seeking the views of the local community?</li> </ol>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy</p>

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	<p>7. Why is WBC now considering this development when a previous application was rejected by the secretary of state in 2017?</p> <p>A development of this size is not suitable for Thatcham and should categorically be rejected.</p>	<p>which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>

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		<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given</p>

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		Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.
Ben Tichband (lpr791)	<p>I am objecting to a building project which will fundamentally change Thatcham. Thatcham has already had significant housing develops in recent years but this is of a totally different scale.</p> <p>Part of the character of Thatcham is that is a very historic town with a semi-rural feel you are never far from the countryside. The town doesn't need to become a scrawling mess all the way along the A4 to Woolhampton.</p> <p>The town has inadequate transport links it already often takes 30 minutes to leave via the south and the A4 is unlikely to handle much more traffic. There is not adequate parking near the station for further commuters - the local residential roads are already full.</p> <p>With future changes to way people shop and work it is likely that the town centres will the plan period the town centres will become empty with new housing being built on greenfields because of cost. This will leave the area with "doughnut" towns.</p> <p>It is vital that green space is protected to support local wildlife. It is also vital that the corridors between towns are maintained to enable wildlife to move between areas. The council has already destroyed the gap between Newbury and Thatcham with development.</p> <p>Leave the site as greenfields, redevelop the excess level of commercial and retail property within the town centres to create the housing needed.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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		<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Nataliya Topliss (lpr807)	The development of this scale will destroy Thatcham. Thatcham has been neglected for many years and this development will make lives of the existing residents of Thatcham much worse. The town simply will not be able to support an expansion of 2,500 new homes. The transport	Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a

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	<p>links are of full capacity with congestion on the A4. There is no plan for a rail bridge. Town has already had extensive developments without any investment into infrastructure. The proposed development is too big for a small town like Thatcham and will put excessive strain on town's poor infrastructure and services.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is</p>



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Sandra Beal (lpr1517)	<p>I can't believe you want build more house in Thatcham, which is already such an overcrowded area. This is always issues with getting doctors' appointments and the schools are already busy.</p> <p>This before you think about the environment and the beautiful green space which will be impacted.</p> <p>Also what about the station and the bridge what will be needed....I feel like I will be stuck in traffic (if this goes ahead)</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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		<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a</p>

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Blaire Palmer (lpr1463)	<p>I am writing to object strongly to the proposed development along Floral Way and beyond.</p> <p>Thatcham is a small town with very few amenities. Newbury is close for general shopping and leisure but Thatcham is now and should remain a small town, not a sprawling extension of Newbury. There is already very little distinction between leaving Newbury and entering Thatcham. New housing developments are all along the roads linking the two. The addition of 2,500 new homes would either overwhelm the amenities in Thatcham or require massive growth of our town, destroying its nature. Measuring the impact on traffic right now is pointless as most people are at home all the time. But imagine the traffic, the fumes while people wait, the noise once we add 2,500 new commuters to the area. You can build a bridge over the railway but that doesn't help. Every mini-roundabout will be a traffic jam trailing back for miles every morning and evening.</p> <p>In addition this is green farm land. I have no objection to developments on brownfield sites, of which there are many. But to build on farm land which provides a home for a wide range of wildlife, provides a beautiful landscape (why is this no longer a powerful consideration? It used to</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there</p>

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	<p>be. We used to ban building on green land to protect the nature of our British countryside. Suddenly that doesn't seem to matter) and which protects the surrounding areas from flooding makes absolutely no sense when we are facing a climate crisis. Have you watched the news? Have you seen the statistics? What makes the developers think that these don't apply to them? Every choice we make now has a direct impact on our sustainable future. It isn't enough to plant a few trees or try to offset the carbon footprint of a development. There needs to be a fundamental rethink about how we provide homes for people while protecting our planet.</p> <p>I see nothing in this proposal that demonstrates the urgency of the climate issue. The houses are not in any way eco-friendly. Construction of roads and destroying the delicate balance of natures by digging up farm land is exactly the sort of thing we need to stop doing. I actually find it unbelievable that such a bog-standard approach is being taken at this time. When people like me are separating our cardboard and bottles and paper and turning our heating down and walking instead of taking the car to try to make a dent in the problem and then developers come along and stick 2,500 homes on the land that is keeping us alive I feel furious. Do you not recognise that this is exactly the behaviour that has to change? Why is the problem always someone else's to solve? Each of us, developers included, have to think radically differently if we are going to have a future as a human race.</p> <p>I understand there are 2000 empty homes in Newbury already. Can we not find a more intelligent and responsible way to house people than build brand new homes?</p> <p>In addition, the world of work is changing. We have seen that many people can work from home and want to continue. This means that plenty of office space will not be required. This can also be turned in to housing. There is about to be a massive shift in the housing and commercial property market but this development is stuck in old thinking which says –“We are allowed to build, so let's build. We are</p>	<p>were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning</p>

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	<p>allowed to carve up this land so let's do it. We need more homes so let's just build new houses rather than looking at the stock we have, the brownfield land, the future needs of working people and try something new which doesn't condemn us to live on a dying planet".</p> <p>There have been proposals to build on this land before. They were rejected. Please reject this one. It flies in the face of any commitment to the environment or the quality of life of the people living here, and once you say yes there is no going back. You will have to watch the news and see how our planet is dying and know you took no responsibility and that you made things that bit worse.</p>	<p>commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>

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		<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>
West Build Homes (lpr2140)	<p>West build broadly support the Council’s approach to the delivery of housing set out within Policy SP12, but have some reservations about specific matters which are set out below.</p> <p>Significant concern exists, however, about the Council’s over-reliance on two large strategic sites. The Council’s own experience, and that on</p>	<p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p> <p>The Council’s strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can</p>

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	<p>a national level, is that strategic sites have lengthy lead-in times, and are inherently slow in delivery, and this should be reflected within the emerging plan review through the inclusion of criteria for sites not proposed for allocation to be considered, increasing the flexibility afforded to the Council and reducing the reliance upon strategic sites.</p> <p>Paragraph 6.10 of the draft emerging plan refers to paragraph 68 the National Planning Policy Framework (The Framework) and the weight that should be attributed to the benefits of using suitable sites within existing settlements for homes. What it fails to have any regard to, however, is the sub section <b>Paragraph 68(d)</b> which states that local planning authorities should:</p> <p><i>“work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”</i></p> <p>West build contends that without reference to the part of the Framework, and the inclusion of such provisions within the proposed policies, the plan is flawed in its approach and does not fully meet the tests of soundness.</p> <p>Policies SP16 and SP17 should include be amended to include an expectation of the sub-division of large sites to allow small and medium enterprise developers to assist in delivering homes and infrastructure in a timely fashion.</p>	<p>delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>
Fiona McPhearson Crowther (lpr2144)	<p>In relation to the proposed extensive expansion of North East Thatcham SP17, I would also like to raise an objection. Again this site is in part in the ANOB the road and public transport infrastructure of the whole area is not being suitably addressed. The likelihood is that significant additional traffic will use the villages of Upper Bucklebury, Chapel Row and Bradfield Southend to cut through to avoid the A4. Traffic speed through the villages is already a significant concern, only to be compounded by the inevitable increase in traffic. In addition, the level</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>crossing at Thatcham is already incredibly busy and would not sustain that level of increased traffic.</p>	<p>AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is</p>



Respondent (with lpr ref)	Response	Council Response
		not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.
Louise Clarke (lpr819)	<p>The proposed development is predicated on a speculative increase in employment within the immediate area. This is unlikely and most residents will probably commute, increasing traffic on local roads. Increased traffic adds to pollution. The level crossing is a bottleneck and leads to increased air pollution as vehicles are idling and it is also damaging to local businesses.</p> <p>The proposed sites are all greenfield sites and these should not be developed because a) they provide habitat for native wildlife, b) access to countryside is important for the well-being of local residents, c) the separation between Thatcham, Midgham and Bucklebury Common will be eroded by development in these areas, d) increased runoff from the proposed development will add to the flooding risks for the rest of Thatcham and Midgham.</p> <p>The proposed 'country park' is no replacement for actual countryside. I have personally seen hares in the easternmost proposed site.</p> <p>These proposals seem to be developer led and don't address the needs of the current and future needs of residents. Being on the outskirts of Thatcham, they do nothing to address the need to revitalise the centre of Thatcham.</p> <p>Revitalisation of the centre of Thatcham should be preferred to any development on the outskirts.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and</p>

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	<p>Brownfield sites should be used before any considerations of developing greenfield sites.</p> <p>The longer term effects of Brexit and the pandemic should be considered.</p> <p>Climate change must be addressed and all developments should reach the highest standards of sustainability, especially if they are being proposed on greenfield sites.</p>	<p>Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>
David Carrier (lpr632)	<p>Our comments relate to the proposed building of 2500 houses to the north east of Thatcham. We are very opposed to this on the basis of:</p> <ol style="list-style-type: none"> <li>1. It is not sustainable as a way forward for this area, this country and indeed the world to continue to build upon our very important &amp; precious green space for ecological &amp; conservation reasons. It may be easier &amp; cheaper to do this but that does make this a right decision.</li> <li>2. Its proximity &amp; therefore impact upon the adjacent AONB. It will give rise to greater traffic flows through narrow &amp; winding lanes, increased usage of the recreation ground in Bucklebury village and more litter, misuse and damage to the ford &amp; river. In addition, it will vastly increase the number of people making use of Bucklebury Common. This is an ecologically sensitive area.</li> <li>3. This development will breach the desired gap between Thatcham &amp; Upper Bucklebury turning it into one sprawl. WBC has the maintenance of suitable gaps between developments as one of its planning policies &amp; this development would fly in the face of this.</li> </ol>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment</p>

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	<p>Every effort should be made to not build on greenfield sites but instead use brown field sites &amp; to explore the re generation of town centres which will continue to decay as shopping habits change.</p>	<p>(LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the</p>

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		<p>HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>
Anoup Puri (lpr2146)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons.</p> <ol style="list-style-type: none"> <li>1. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area</li> <li>2. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>.</li> <li>3. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland.</li> <li>4. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.             <ol style="list-style-type: none"> <li>a. This will significantly impact the freight traffic using the industry site at Thatcham;</li> <li>b. It will significantly</li> </ol> </li> </ol>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered</p>

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	<p>increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</p> <ol style="list-style-type: none"> <li>5. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</li> <li>6. Schooling – this will obviously have an impact on local schools (and traffic).</li> <li>7. There will be an increase to the pollution in the area from the output of the 2500 houses as well as from all the extra cars.</li> <li>8. There will be an increase in the usage of The Common with a detrimental impact on the wildlife fauna and flora. There will be further increase in the people driving up to the common, parking the cars anywhere as seen recently during the pandemic.</li> <li>9. There will be a further increase in the dog walkers driving to the common parking anywhere and leaving behind the dog mess as well as bags containing dog mess. We have seen a high increase in the volume of this dog mess in the last year</li> <li>10. There is inadequate parking at the train station. The train barrier is already causing long delays in the traffic and an increase in the traffic generator will cause further disruption.</li> <li>11. Upper Bucklebury we'll no longer be seen to be a village but apart off the new development and Thatcham town</li> <li>12. There will be years off horrendous noise pollution generated by the new build work including the levelling off the slopes and the removal of the Earth before any build can start. There will be further noise pollution from all the trucks bringing the supplies for the building work, cement mixers is that an industrial scale et cetera.</li> </ol>	<p>that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development,</p>



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		<p>including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development</p>

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		<p>proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>

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Susan Puri (lpr2145)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons.</p> <ol style="list-style-type: none"> <li>1. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area</li> <li>2. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>.</li> <li>3. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland.</li> <li>4. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.             <ol style="list-style-type: none"> <li>a. This will significantly impact the freight traffic using the industry site at Thatcham;</li> <li>b. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</li> </ol> </li> <li>5. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</li> <li>6. Schooling – this will obviously have an impact on local schools (and traffic).</li> <li>7. There will be an increase to the pollution in the area from the output of the 2500 houses as well as from all the extra cars.</li> <li>8. There will be an increase in the usage of The Common with a detrimental impact on the wildlife fauna and flora. There will be further increase in the people driving up to the common, parking the cars anywhere as seen recently during the pandemic.</li> <li>9. There will be a further increase in the dog walkers driving to the common parking anywhere and leaving behind the dog mess</li> </ol>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s</p>

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	<p>as well as bags containing dog mess. We have seen a high increase in the volume of this dog mess in the last year</p> <ol style="list-style-type: none"> <li>10. There is inadequate parking at the train station. The train barrier is already causing long delays in the traffic and an increase in the traffic generator will cause further disruption.</li> <li>11. Upper Bucklebury we'll no longer be seen to be a village but apart off the new development and Thatcham town</li> <li>12. There will be years off horrendous noise pollution generated by the new build work including the levelling off the slopes and the removal of the Earth before any build can start. There will be further noise pollution from all the trucks bringing the supplies for the building work, cement mixers is that an industrial scale et cetera.</li> </ol>	<p>Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the</p>

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		<p>2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and</p>

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		<p>Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p>
Patrick Grincell (lpr2035)	<p><b>Summary</b></p> <p>The LPR and the proposed Policy SP17 directly contradict with many of the key requirements set out in the NPPF. In particular, the LPR and Policy SP17 fail to meet the provisions set out in NPPF paragraphs 2, 8, 9, 15, 16, 25, 31, 32, 67, 73, 79, 97, 118, 119, 127, 170, 171, 172, 173, 176 and 179.</p> <p>The LPR itself is contradictory, with the provisions of Policy SP17 failing to meet many of the requirements of other draft policies. In particular Policy SP17 is at odds with the strategic aims and objectives of the LPR, together with Policies SP1, SP2, SP4, SP5, SP6, SP7, SP8, SP10 and SP11. As for SP12, we consider this needs to be revisited and a further assessment made of housing need and the sites available to meet this need over the plan period, focussing more on previously used land. Significantly, we do not consider there is a need to allocated</p>	<p>The West Berkshire Local Plan Review is an important part of the development plan. It identifies the development that is required to meet local needs until 2039. It sets out the strategy for distributing development within the district and the policies for protecting, conserving and enhancing the natural and built environment. It is important that the LPR is read as a whole. All LPR policies should be viewed together and not in isolation in the preparation and consideration of planning applications. Development proposals will be judged against all relevant policies. All Development Plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide</p>

Respondent (with lpr ref)	Response	Council Response
	<p>greenfield land for the addition of 2500 new homes to the north east of Thatcham.</p> <p>In addition, the proposed Policy SP17 has fundamental failings that have not been considered at all by WBC and are ignored in the LPR. These include:</p> <ul style="list-style-type: none"> <li>• significant and adverse impact on the AONB and Bucklebury Common;</li> <li>• the loss of the existing landscape gap and the coalescence of Thatcham and Upper Bucklebury;</li> <li>• the unacceptable loss of the distinct community within the village of Upper Bucklebury;</li> <li>• the loss of important greenfield land that not only forms a buffer between settlements but a key agricultural and ecological resource that cannot be replaced once built on;</li> <li>• significant and adverse impact on biodiversity and the very sensitive local environment, ecology, protected species of flora and fauna, which has not been assessed;</li> <li>• concern about impact on flood capacity and risk;</li> <li>• traffic impact, with significant disruption and increased congestion on an inappropriate highway network; and</li> <li>• increased pollution from sources including traffic, lighting, noise, construction and the general increase that will come from such a significant development.</li> </ul> <p>We urge WBC to go back to the drawing board and rethink the approach for the LPR, deleting the poorly conceived proposals for the extension of Thatcham. It needs to engage with and listen to its community not simply throw out proposals that will have a devastating effect on the lives of local people. We are not anti-development and the reverse is true, but any development must be necessary, of a very high quality, be appropriate, proportionate and respect and enhance the quality of the existing environment and community. All of these are key</p>	<p>the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>requirements of the NPPF but what we have seen proposed in the LPR through SP17 significantly fails to meet these expectations.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to</p>



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		<p>local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Karen Harris (lpr2017)	<p>I would like to strongly register my objection to the proposed full development of the above sites for the following reasons.</p> <ol style="list-style-type: none"> <li>1. The Vast majority of Upper Bucklebury residents are against this development, many have already registered their objections, however many are not aware of the application or consultation as no information has been sent out by WBC. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is</p>

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	<p>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</p> <p>3. It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating <b>“particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”</b>.</p> <p>WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC's own intentions.</p> <p>4. A previous application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far?</p> <p>5. It is a massive over development of the Countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West berks is AONB. WBC have previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</p> <p>6. It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and</p>	<p>acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given</p>

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	<p>towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <ol style="list-style-type: none"> <li>7. This will significantly impact the freight traffic using the industry site at Thatcham</li> <li>8. It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</li> <li>9. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</li> <li>10. It will completely surround the Crematorium at Thatcham which was, as I understand, placed there to be away from residential properties and has constraints placed on it.</li> <li>11. It is stated/assumed this will help the Upper Bucklebury Business – predominantly the Pub and Shop. The Pub is hardly likely to benefit as a) pub usage across the country is in decline b) the Pub at the bottom of Harts Hill cannot already sustain a business. One pub is hardly justification for a development this size. The shop is also likely to suffer as the plan indicate that shops will be included, so it is likely it would have a detrimental impact on the only shop in UB, creating more traffic.</li> <li>12. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</li> <li>13. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</li> <li>14. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</li> </ol>	<p>Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape</p>

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		<p>and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Sharon Papierowski (lpr2149)	<p>I am writing to <b>OPPOSE</b> any further development in Thatcham. I have been a resident of the town for over 40 years, been schooled here and raised my family. As you can imagine I have seen a massive increase in new build homes over this time, but very little investment in any infrastructure – as admitted in your own report. My objections are as follows:-</p> <p><b><u>SEWAGE/WATER</u></b></p> <p>Thames Water are already struggling to cope with the current population in Thatcham, and have been served notice to clean up their act.</p> <p>Despite the recent flood alleviation works, the ground for the proposed development is currently saturated, the A4 outside the Crematorium is frequently flooded, as are other patches along this stretch of the road, all the way to Theale. The new houses currently being built in Woolhampton are testimony to this, as water ran through the buildings during construction and the road was covered in sludge.</p> <p>The construction of the flood alleviation works ran over time and budget, and were shoddily 'completely' to the point where the very residents who were to benefit from the works were fed-up, and formed a</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part</p>

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	<p>residents group. There is little appetite for further construction works in any form across the town.</p> <p><b><u>PUBLIC AMENITIES</u></b></p> <p>Our current leisure amenities are desperately underfunded, and building further ‘amenities’, in the new development offers nothing to existing residents.</p> <p>Our existing public right of way will be lost in the new development - we do not need ‘public green spaces for all to use’ - we have the countryside.</p> <p>At present our library, toilets, youth services and leisure centre are desperately underfunded and barely accessible. Community halls struggle for bookings.</p> <p><b><u>ESSENTIAL SERVICES</u></b></p> <p>I have on several occasions, called the police to report anti-social behaviour, and am told ‘there are no patrols in Thatcham tonight’. 2500 additional homes will exacerbate this.</p> <p>We have no A&amp;E department at our local hospital, no maternity unit and waiting times for routine doctors’ appointments is in some cases are 12 weeks, pre Covid.</p> <p>The report states a need for two primary schools, but there is no mention of a secondary school, yet 20-25% of Thatcham’s children currently travel to Newbury as there aren’t enough spaces. Schools struggle to recruit teachers, and we are about to close a primary school in Thatcham as no demand.</p>	<p>of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p>

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	<p><b><u>ENVIRONMENT</u></b></p> <p>Thatcham already suffers with light pollution, the dawn chorus can be heard at 1am.</p> <p>The effect on rural communities are such that are Bucklebury, Woolhampton and Cold Ash boundaries will be non-existent.</p> <p>Thatcham Vision found residents in favour of Brown Field development.</p> <p>There is no commitment to net-zero carbon mentioned in the report.</p> <p>Please advise where can the environmental impact study be viewed?</p> <p><b><u>TRANSPORT</u></b></p> <p>Traffic is already congested at the Floral Way and Siege Cross Roundabouts– right down to the train station. The area is further congested with Francis Baily school run traffic and the new ‘Orcas’ which are an accident waiting to happen. HGV’s travel in these areas all day, every day, due to the distribution centres in Pipers Way – the addition of more housing will make this worse.</p> <p>Northfield Road, Park Lane and particularly Harts Hill Road will become rat-runs to avoid these roundabout.</p> <p>There is limited parking at the train station, and SSE staff have caused problems with residents as parking on housing estates. There is no provision for additional commuters.</p> <p><b><u>ECONOMY</u></b></p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>

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	<p>It is beggars-belief that Newbury is described as being the ‘central hub’ for shopping, and will continue to be so. Whoever, wrote this clearly has no knowledge of the area at all. If you live in North or East Thatcham is it almost as quick to travel to Calcot, Reading or indeed Basingstoke – and the retail offerings (and parking) are far greater. To make Newbury a central hub, the housing has to be in Newbury.</p> <p>Thatcham has few high quality jobs, most residents are self-employed or commute. In recent years three major banks have pulled out of our High Street, and pubs are unsustainable. The Plough has closed, and The Mill House changes hands with alarming frequency. Both main supermarkets are overpriced, (compared with, for example, Tesco) – the development requires 40% affordable housing – people in affordable housing do not shop in Waitrose!</p> <p>This development does nothing more than create a dormitory town which does nothing to integrate with the existing town.</p> <p>Could you please provide details on how you proposed to run affordable housing schemes? The housing association properties in the area are poorly constructed – I have friends constantly on the phone to their housing association to rectify faults with windows and doors that don’t close properly etc. Panorama recently spoke out <a href="https://www.bbc.co.uk/programmes/m000pk2b">https://www.bbc.co.uk/programmes/m000pk2b</a></p> <p>I can’t envisage any developer providing 40% affordable housing, without cutting corners – it simply isn’t financially viable unless there is a sting in the tail, or they reduce the percentage required.</p> <p>Finally, and probably most importantly, I believe the Government algorithms for calculating the housing requirement are currently under scrutiny.</p>	<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>All Local Plan Review Evidence Base documents can be viewed <a href="#">here</a>.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>

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	<p><a href="https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993">https://www.google.co.uk/amp/s/www.bbc.co.uk/news/amp/uk-politics-55322993</a></p> <p>Please advise if your current consultation is in line with this, takes the Pandemic into account and the loss of our town centres?</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>In relation to affordable housing, the relevant policies are set out in the Local Plan Review.</p>
Lesley Staves (lpr853)	<p>As a member of Newbury District Ornithological Club and a local bird and nature enthusiast, I wish to comment on the prospect of 2,500 new houses being built on land to the north-east of Thatcham.</p> <p>I feel that this huge development would have a devastating impact on the fragile ecosystems of the local area, particularly to the north towards Upper Bucklebury's woods and the heathland of the Common. These areas host ground-nesting birds such as Nightjar, Woodcock, Woodlark and Stonechat, and there are several occupied Barn Owl boxes placed around the site, the birds requiring extensive ground to hunt over. Heathland wildlife such as adders and slow-worms as well as rare plants are also found there. The northern boundary of the development site is far too close to the escarpment and the woods and</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to</p>



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	<p>heathland will inevitably be affected by an increase in visitors and dogs which are a particular threat to ground-nesting birds. It is naïve to think that a proposed 'country park' in the development would keep dog-walking close to home.</p> <p>I also ask the question – why so many houses in one huge estate? Indeed, as a result of the Covid-19 pandemic, many companies are planning to continue with home-working for many of their staff, therefore leaving vacant office space that is bound to be converted into homes.</p> <p>The whole plan needs rethinking, giving existing local communities a better opportunity to consult and advise and more attention should be given to ecology and biodiversity throughout the development site, especially incorporating stipulations that wildlife corridors such as established hedges and mature trees must be maintained when developers start building. 2,500 houses in one area is totally excessive.</p>	<p>conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>
C and A Cramer and Inwood (lpr1640)	<p>To whom it may concern with regard to the development of Thatcham NE. The land beside the A4, up to cox's lane and woodland at Bucklebury. We strongly OBJECT TO THIS PLANNING</p> <p>Here are our objections to this atrocious plan</p> <ol style="list-style-type: none"> <li>1. Total over development of countryside, loss of green space</li> </ol>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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	<ol style="list-style-type: none"> <li>2. Mass building should not be able to cross from Thatcham to the countryside. It is an area of absolute peace, beauty &amp; tranquillity</li> <li>3. The development will be on the skyline</li> <li>4. The loss of wildlife &amp; habitat will be tragic. We have seen slow worm, badger, deer, hare, ground nesting birds, buzzard, owls, bullfinches, butterflies, wild flowers, kite and buzzard all in these very fields that are under threat of development..</li> <li>5. The impact of the village with increased footfall, litter, dog mess, noise and light pollution will be high &amp; totally unacceptable. It has already been bad enough due to increase footfall due to Covid. Long Grove has seen an increase in litter, abandoned bags of dog mess, noise &amp; stuff thrown in gardens. This would be the main route from the new development to the village, that's without the occupants of 2500 houses. Total unacceptable.</li> <li>6. The increased traffic on the A4, access and the never ending problem with the lack of bridge over the rail line in Thatcham will be a nightmare. The increase in traffic through the village with increased pollution, noise &amp; physical will be at a massive level, putting pedestrians at risk with speeding cars.</li> <li>7. This is prime agricultural land, it should not be turned into housing</li> <li>8. Flood risk. If you build all the houses, where is all the water going to go? Into the flood defences that may not be maintained.</li> </ol> <p>We therefore absolutely OBJECT to this.</p>	<p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site. With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the</p>

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		<p>LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a</p>

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		<p>development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Bernadette Southgate (lpr1641)	<p>I am writing with regard to the proposed housing development beside Harts Hill Road on the eastern side.</p> <p>I have lived on Siege cross and now live in Upper Bucklebury for the last 30 years.</p> <p>I completely reject this proposal for the following reasons</p> <ul style="list-style-type: none"> <li>-the current road system will not be safe with that many additional cars on the road. Speeds are already dangerous on both Harts Hill road and Floral way. There will be increased chance of accidents with the road from the new estate</li> <li>-Upper Bucklebury and the villages towards Reading will become a rat run for cars to and from A4 and M4 and the ridge or Cold Ash Hill will be</li> </ul>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed</p>

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	<p>a back way to the A34. The village roads are narrow and parked cars add to the hazards</p> <p>-The green space is very important to many inhabitants of both Thatcham and Upper Bucklebury. The site proposed was never meant to be built on,</p> <p>-there are also important habitats for birds, insects and other animals.</p> <p>-The health care facilities could not cope with increased population. There are 2 medical facilities already in Thatcham but these have more patients than can be safely cared for</p> <p>-I remember the floods from some years ago when this whole area flooded all the way towards the Kennet school and onwards</p> <p>-The Kennet school is already oversubscribed and there would need to be new schools.</p> <p>-The infrastructure of Thatcham is not able to support another 1000 people. Thatcham is like a village that has burst at its seams. Original inhabitants still call it the village-and this is borne out by inadequate shops and facilities.</p> <p>My vision of another big estate as is proposed is detrimental significantly to whole area and the people who already live there.</p>	<p>by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will</p>

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		<p>be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Linda Godfrey (lpr2153)	I strongly object to the proposal to build 2500 houses on farmland between Thatcham and Upper Bucklebury. I agree with the objection	The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is

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	<p>response from Bucklebury Parish Council. In summary I believe the plans will cause the following issues:</p> <ul style="list-style-type: none"> <li>• a merging' of Thatcham and rural Upper Bucklebury with very little gap between Thatcham and Upper Bucklebury.</li> <li>• Bucklebury is an Area of Outstanding Natural Beauty</li> <li>• detrimental to flora and fauna,</li> <li>• damage to ancient woodlands</li> <li>• will cause light pollution</li> <li>• loss of green space</li> <li>• huge impact on surrounding local villages</li> <li>• country lanes not built for existing levels of vehicles</li> <li>• traffic problems already an issue in Thatcham especially around level crossing, at school times and rush hours</li> <li>• already overstretched local services, lack of GPs, dentists, schools etc.</li> <li>• increased flooding potential</li> <li>• Infrastructure issues to surrounding villages, e.g. water supplies and water pressure</li> </ul>	<p>acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research</p>

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		<p>Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to ancient woodland, Policy DM14 makes clear development should buffer any ancient woodland it affects by providing sufficient space to afford surrounding protection and allow for future growth where possible. Development near ancient woodland will be treated in accordance with the latest ‘standing advice’ from Natural England and the Forestry Commission. This states that there should be a buffer of at least 15m from the boundary of ancient woodland to avoid root damage. The precise buffer would need to be determined by further assessment and detailed design at the planning application stage.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p>



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		<p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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		<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
David Howard (lpr2004)	Whilst developments have to happen, 2500 new homes on Thatcham is unreasonable given the huge developments in the area over the past 30 years with the infrastructure still trying to catch up. In the West Berks area, the Sandleford development should be finalised and approved before any other major development is even considered.	Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location

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		<p>to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Ian Pratt (lpr1642)	<p>I wish to strongly object to the proposed NE Thatcham development for the following reasons:</p> <ol style="list-style-type: none"> <li>1. It destroys the strategic gap between Thatcham and Upper Bucklebury, which has always been a key part of WBC planning policy.</li> <li>2. It will have a major impact on the environment, particularly on Bucklebury Common and the adjacent AONB.</li> <li>3. There will be significant light pollution on Bucklebury Common.</li> <li>4. It is destroying high quality agricultural land, when there are brownfield sites within WBC that could be utilised.</li> <li>5. There is nothing in the plan that is going to address the increased traffic from the additional cars (potentially 5000 additional vehicles) from the development. The Thatcham NDR and A4 is very congested during the rush hour, and traffic that wants to go to the M4 or North on the A34 is not going to go along the A4 to Newbury, it will go up Harts Hill, along Burdens Heath to Cold Ash and then down to Hermitage to join at Chieveley. Equally, traffic that wants to go south to Basingstoke will get stuck trying to cross the railway line either at the Thatcham level crossing, or on the traffic light controlled bridge over the railway on Brimpton Road.</li> <li>6. Whilst the plan talks about new infrastructure for Thatcham, in reality it is 2 primary and 1 secondary school being built, which will be primarily used by residents of the new development. Even the proposed sports facility is not central to Thatcham and so is less likely to be used by</li> </ol>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy</p>

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	<p>existing Thatcham residents.</p> <p>7. There is nothing to address the redevelopment of Thatcham town centre, particularly for food shopping. Not everyone is going to want to have their food delivered on-line, and so it will result in additional car journeys to Newbury town centre and the retail park.</p> <p>8. There is nothing to address the congestion at the level crossing, or the total lack of parking at Thatcham Station. The new development is too far from the station for people to walk there.</p> <p>9. No mention of any additional health services – the existing facilities at Chapel Row will be severely impacted, and no new health service facilities will be built until after the houses have been built.</p> <p>10. There will be a significantly increased risk of flooding in Thatcham and along the A4.</p>	<p>which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as</p>

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		<p>being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with</p>

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		infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.
Toby and Gail Woodhouse (lpr2018)	<p>Dear Sir/Madam</p> <p>We have attended two meetings held by members of the Bucklebury Parish Council and having reviewed the content of related planning documents we write in line with the public consultation to outline our objection to the development of 2,500 homes within the North Thatcham area.</p> <p>We outline our objections below.</p> <p>Environment (AONB SP1 &amp;SP 2) – the proposed development abuts Bucklebury Common and the North Wessex Downs AONB. Residents of the proposed new developments will be drawn to the Common and will significantly increase the pressures already evident on the delicate eco systems and existing wildlife.</p> <p>Parking on and around the Common is already exceeding capacity, with verges being used during peak periods. Whilst the development is relatively close, not all residents will walk/cycle to the Common they are more likely to drive. The open spaces on the proposed developments will not be big enough or as appealing as the Common land within the AONB.</p> <p>Wildlife (SP11) - the impact on local eco systems and wildlife will be significant. Whilst plans identify mitigating actions (open space) and reference sustainable development it is quite clear that this development of farmland and natural open habitat will destroy areas currently used and occupied by wildlife. The open spaces proposed in the development areas will not be enough either for the wildlife or the residents and the additional</p>	<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>

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	<p>footfall, which is inevitable, will also impact wildlife on Bucklebury Common and the AONB.</p> <p>Traffic (SP17, SP22)            Thatcham is already a bottleneck for traffic flowing through the town on the A4 between Newbury and Reading. By introducing a new road network with the proposed traffic calming, traffic lights and roundabouts, the impact of on the flow of traffic will be significant.            All of the above will have a knock on detrimental effect on the local roads and quiet lanes in Bucklebury as the additional cars and residents try to avoid the traffic chaos in and around Thatcham and the associated A4 area. The local lanes and roads which are designed with layouts, size and speed limits to support only local traffic will be used as short cuts through to Reading, Newbury and the M4 to avoid the A4 congestion.            We note reference is made to the close proximity of the proposed developments to Thatcham Railway Station. The ability to get to the station at peak times is already near impossible by car. While we appreciate the plan places an emphasis on sustainable travel there is no requirement for residents to comply with this. Cycle ways and pedestrian routes may be included and built by the developers but in poor weather, the dark winter months and for convenience residents will turn to their cars and further impact on the already congested road network.</p> <p>Flood Risk (SP6)            Recent flood alleviation works to the North of Thatcham have been put in place to protect houses businesses and infrastructure in the areas most severely affected by the 2007 flooding event. The events will only increase. Whilst there are proposals included to manage the flow of surface water down into the valley (SUDS) they are not designed to support the heavy volume of water from such a large scale development scheme. In extreme weather events which it is recognised will only increase in frequency and intensity, SUDS will simply release</p>	<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and</p>

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	<p>their water into the existing flood management scheme adding pressure on it and increasing the risk of Thatcham flooding again.</p> <p><b>Pollution</b> Light – the development will generate significant levels of light pollution again impacting on wildlife and the eco systems adjacent which will drive these natural pleasures away from the area. Notwithstanding the effect for local residents on their night sky. Pollution- the volume of homes and associated transport requirements will generate increased pollution from carbon emissions as well as those associated with population density. The clean air experienced on the Common and the AONB currently will be a thing of the past.</p> <p><b>Rail</b> While Thatcham railway station is within a reasonable distance of the proposed sites there is no capacity for additional cars, railway or on-road parking. There is no reference to any consideration around improving the infrastructure networks around the railway station and without this the already creaking system will be overwhelmed and fail. The trains currently stopping at Thatcham are governed by the length of the platform. Larger capacity trains will require a further platform extension and will require the level crossing to be closed for longer periods.</p> <p><b>Medical</b> Medical services in Thatcham Bucklebury Cold Ash Chapel Row and Bradfield Southend are already under pressure, with some at capacity. New services are included in the proposed scheme (GP surgery) however there is no obligation for these services to be provided prior to completion of the housing. Indeed we believe these will wait until the demand reaches a specified level. In the intervening period new residents will expect to join existing surgeries and services already at capacity. We wonder how and when the NHS will be engaged on these</p>	<p>any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB ‘A Guide to Good External Lighting’ (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>



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	<p>proposals to start planning for the influx of thousands of families who will expects schools GPs and hospitals to take care of them.</p> <p>Observations            Thatcham remains a small town that has little or no investment over the years. By granting permission for this development the local authority is again devolving its responsibilities by placing the need to provide services and infrastructure onto others. Before West Berkshire Council considers further development in Thatcham it should first demonstrate, to existing residents, its commitment to invest in the area. Without this WBC will continue to face strong opposition to applications that see housing numbers increase significantly while anticipating the infrastructure and investment will be made by others in their own timeframes.</p> <p>We are opposing the North East Thatcham Development Proposal THA20.</p>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Maria Bird (lpr2005)	<p>As a resident of Midgham for the past 20 years, I wish to object to such a development being allowed in the area.</p> <p>For a number of reasons not least:</p> <ol style="list-style-type: none"> <li>1. Flooding around the area south of the A4 and opposite this development onto what already is a flood plain - flooded in 2007. Will create more exposure for residents on the south side of the A4.</li> </ol>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the</p>

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	<ol style="list-style-type: none"> <li>2. An area of natural beauty, housing badgers, hares, bats, deer and more - all of these have been monitored by various naturalists in the local area and have been identified and recorded. Woodland with a huge biodiversity would be stripped and gone forever.</li> <li>3. The green belt between Thatcham and Upper Bucklebury and the none development into the Midgham boundary will be totally and irresponsibly ignored.</li> <li>4. The A4 is a road of national speed limit at the point of this housing development road speeds would need to be substantially reduced, making the entrance onto what is already a very busy road esp. in rush hour almost impossible to enter onto. The safety of cyclists and pedestrians is paramount.</li> <li>5. Archaeological digs and surveys need to be made whilst caring for the surrounding environment. I know that there are many Saxon plots in the area as well as Bronze Age settlement.</li> <li>6. Light, noise and air pollution is a huge factor - as a resident of Midgham, I certainly would not entertain light or noise pollution in this country environment</li> <li>7. Infrastructure of Thatcham is appalling now, where is the heart of Thatcham? Little insubstantial retail, medical practices bursting at the seams, no entertainment for young or old residents alike. Full of poor quality public houses, take away food establishments, second hand and charity shops and a sense of neglect for the main Broadway. Come on WBC improve for the residents that are currently living here. Not exacerbate the problem!</li> <li>8. If development goes ahead, where is the green eco housing that this planet so immediately needs? Let's see some substantial investment in solar, wind and other more sustainable sources from the local and national government. Still we are building houses with oil, gas and carbon fuelled heating.</li> </ol>	<p>LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>

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	<p>9. I've noted a plan to extend the industrial space from Colthrop toward the east. Colthrop still has units that have been up to let since I moved here in 2001. This must NOT happen, spilling over into the beautiful countryside. Keep Berkshire spaces sacred.</p> <p>Thankyou</p>	<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the Council will require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should</p>

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		<p>contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>
Camilla Kingham (lpr2154)	<p>I am writing with regard to the above Local Plan Review 2020 -2037, with particular reference to the plan to build 2500 new houses on land between Upper Bucklebury and north Thatcham from Colthrop on the A4 to the east and through to the west north of Floral Way on Dunston Park - The Policy SP17 "North Thatcham Strategic Site Allocation".</p> <p>This plan appears ill thought out, and I cannot support these plans, for the following reasons:-</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required,</p>

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	<p>Thattham has grown substantially in size in the last 50 years, with little forethought to the infrastructure to support the number of households, and this proposed development will virtually join Thattham to Bucklebury.</p> <p>This would be of enormous detriment to the Parish of Bucklebury in particular the increased volume of traffic on predominantly single track rural roads, that already appear unable be maintained to a decent standard due to increased volume of traffic. Such a plan would make them increasingly more dangerous for pedestrians, cyclists and horse riders as many have no verges in places.</p> <p>It appears no thought has been given on the transportation flow chart to how vehicles wishing to access the A34 north would proceed, but it is clear to me that they would use Harts Hill Road, the Ridge and lower Pang roads as an access and return route. This is why I strongly believe this Local Plan Review 2020 -2037 is highly flawed and transportation issues need to be clearly reassessed.</p> <p>There would be an escalation in litter to the Parish countryside and the Pang Valley, including the River Pang from the increased vehicle and foot fall locally, together with the increase in dog poo bags left behind in rural spaces.</p> <p>It seems that this suggested plan does not sit well with WBC vision and strategy to protect the AONB, with such a development on its boundary. It will certainly downgrade the AONB!</p> <p>Light pollution will be another issue for the Parish of Bucklebury, which currently enjoys unpolluted skies at night.</p> <p>There is only one minor reference in your Local Plan Review 2020 - 2037 to Upper Bucklebury and none to the ancient settlement of Bucklebury village, therefore giving rise for concern that you have not</p>	<p>and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thattham train station. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better</p>

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	<p>considered the enormous impact this potential increase in houses and householders would have on Bucklebury Parish (and other neighbouring parishes).</p> <p>Currently there is an enormous amount of retail space becoming available in local towns; surely this space should be used wisely now for housing (in the light of the public tending to shop more on line). The impact of Covid 19 has made many councils up and down the country reconsider their town spaces for such purposes, and Newbury certainly has been impacted. Surely it makes sense to give change of use to Parkway sites that are now vacant. Not only would this benefit existing retail, communications and transportation, but the housing would be suitable for first time buyers, with the Kennet River and Victoria Park at close hand. It does seem a no brainer to use existing buildings in the first instance!</p> <p>Some specific points in your document:</p> <p><b>The number of houses required in the overall plan</b></p> <p>In the supporting text to Policy SP12, you explain the calculation basis from the NPPF that was defined and published in February 2019 (<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf</a>). However that calculation was established before the AWE REPPPIR and the new DEPZ was set on 22 May 2019 (<a href="https://info.westberks.gov.uk/awe">https://info.westberks.gov.uk/awe</a>). Thus the 'housing demand number' set by the Government formula was determined before the area available for new housing in West Berkshire was shrunk by the enlarged safety zones around Aldermaston and Burghfield.</p> <p>The area of West Berkshire outside of the AONB is approx. 182 km2. The areas of the two DEPZs within West Berkshire are approx. 21 km2 (for Aldermaston) and 33 km2 (for Burghfield) = 54 km2 in total (using</p>	<p>accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>

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	<p>the smaller 'jagged edge DEPZ' rather than the larger OCZ 8km buffers).</p> <p>Thus, the enlargement of the DEPZs has reduced the available West Berkshire non-AONB area by <math>54/182\% = 30\%</math>.</p> <p>West Berkshire Council should make representations to Government to argue for a reduced number of houses as a result of the DEPZ regulations coming in after the original demand calculations were made. The new provision should be for 6188-6842 (a reduction of 2652-2932 houses). In Policy SP4, West Berkshire is following the ONR's recommendation against development of 200 dwellings or greater from the larger Outer zone. If the reduction in available area due to that larger zone was to be considered, the number of houses in WBC's new provision should be even smaller.</p> <p><b>The DEPZs</b></p> <p>Within the section "What has happened so far?" you refer to the previous consultations conducted in 2018 and February 2020. However, those were conducted before the Aldermaston and Burghfield DEPZ areas were extended, and thus the validity of those consultations is now questionable.</p> <p><b>Protection of the AONB</b></p> <p>Within your vision and strategy, you seek to protect the AONB (which I admire):</p> <p>"Our vision: West Berkshire's landscape in the North Wessex Downs will remain of outstanding value and its biodiversity more abundant in settlements and the surrounding countryside."</p>	<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the</p>

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	<p>"Strategic Objectives: Together with partners, to continue to conserve and enhance the North Wessex Downs AONB, with appropriate landscape-led development delivering wider environmental, economic and social benefits."</p> <p>However, by planning for a new development of 2500 homes, up to the very boundary of the AONB, you introduce the high risk of doing the opposite of your vision and strategic objectives. The population of the extended Thatcham will overspill into the Bucklebury area of the AONB. It will increase the damaging 4x4 traffic on Bucklebury Common, put more cars into the narrow single track lanes that wind down from the Cold Ash - Upper Bucklebury ridge into the Pang Valley, send more people down to the recreation ground and playground in Bucklebury Village, add to the numbers of people who 'play' around Bucklebury Ford and who litter the River Pang.</p> <p>Within your section on development INSIDE the AONB (Policy SP2), you write:</p> <p>"If the proposal is considered to be major development, then the second part of the policy will apply and the following factors, as set out in the policy, will be taken into account:</p> <ul style="list-style-type: none"> <li>• Detrimental effects on the environment, including wildlife and cultural heritage..."</li> </ul> <p>Your Policy SP2 applies to development within the AONB. It should equally apply to development adjacent to the AONB, where the development's residents will overspill into the AONB. Whilst the houses can't move, the people will.</p> <p>Your plan for 2500 homes adjacent to the AONB will not protect the AONB.</p>	<p>available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>As part of LPR, WBC Emergency Planning Team, the Office for Nuclear Regulation (ONR), and AWE have all been consulted. As part of any future planning application for NE Thatcham, the above consultees will be consulted because the site falls within the OCZ.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning</p>



Respondent (with lpr ref)	Response	Council Response
	<p><b>Previous Land Character Assessment (2002)</b></p> <p>In Policy SP8, you say that "Proposals for development should be accompanied by an appropriate landscape assessment". In the supporting text, you reference the "North Wessex Downs AONB Landscape Character Assessment (2002)". That assessment (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=40260&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=40260&amp;p=0</a>) considered a development on the northern edge of Thatcham. That assessment concluded:</p> <p>"Conclusion and cumulative effect of all THA sites (THA011, THA014 and THA027) and the potential cumulative impact on Thatcham and Cold Ash. It is recommended that the above three sites should only be considered further as a whole, limiting development to the slopes below 95m AOD. If any one of the sites were to be developed in isolation this would result in an unacceptable level of expansion of Thatcham north of the well-defined settlement boundary along Bowling Green Road and Heath Lane. In the light of modern housing along the lower slopes of Cold Ash Hill, the low visibility of those parts of the sites close to the settlement and the more suburban character of these particular areas, the recommended reduced developable areas shown in THA0011.2, THA014.2 and THA027.2 could be justified in landscape and visual terms. However, it is particularly important to limit the northern expansion of this area in order to retain the separate identities of Cold Ash and Thatcham, to retain the open rural character of the open countryside between the two settlements and to prevent further intervisibility between the built forms of each settlement."</p> <p>Yet in your proposal to join north Thatcham to Upper Bucklebury, you made no such equivalent consideration. Your proposal has development up to 125m AOD. You make no equivalent comment that "However it is particularly important to limit the northern expansion of this area in order to retain the separate identities of Bucklebury and</p>	<p>proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Thatcham, to retain the open rural character of the open countryside between the two settlements".</p> <p>I trust that West Berkshire Council will take the following steps:</p> <ol style="list-style-type: none"> <li>1. Seek a reduction from Government on the target number of homes to be built as a result of the enlargement of the DEPZs.</li> <li>2. Changes its plans so that there will be no new large development adjacent or almost adjacent to the AONB.</li> </ol>	
Andrew Kirke (lpr2007)	<p>Regarding the 2,500 houses being proposed to be built, I am mailing to make it clear to myself who is already living here as well as my wife and neighbours that the plan is not very well thought out.</p> <p>Clearly housing needs to be built, however where this proposal is will have a detrimental effect certainly on my part of Thatcham if not all the town.</p> <p>The current infrastructure as it is (schools, doctors, car parking etc) is not up to the task of taking this many homes and the associated occupants, and though there has been work going on since before we moved in to alleviate flooding issues that have hit Thatcham in the past it certainly not cured them as all the water currently sits at ground level and is not draining away.</p> <p>Do you think adding 2,500 properties in the proposed area will help this?</p> <p>There are already long queue's morning and evening at rush hour trying to cross the train station that certainly will not improve with more traffic.</p> <p>Loss of green space generally considered public space (for example Piggy Woods off of Flory Way) are to be demolished to make way for</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the plan. Surely we have learnt about the local environment and wildlife to know we are destroying it?</p> <p>Would a housing plan make more sense in Newbury than into this area.</p>	<p>wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>

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Rachel Tott (lpr1643)	<p>I am writing to object to the plans that have been submitted to develop the greenfield area adjacent to Thatcham. I am a resident of Dunstan Park, Thatcham and I think the plans as they are set out are ridiculous.</p> <p>The proposal suggests that 2500 homes can be built and that this will somehow benefit the local community.</p> <p>* The homes are not (for most people) walking distance from Thatcham town centre (TTC) so for the businesses in TTC to benefit the people in this new development are going to have to drive.</p> <p>* There is no proposal to change the infrastructure that supports Thatcham. The A4 at peak times is severely congested. Prior to covid I spent every evening in a queue on the A4 that stretched back to Midgham on my return to work. It can be expected that 2500 new houses will result in 5000 new cars and as already highlighted the houses are not close to any amenities, so all of these cars will be heading out on the roads through and around Thatcham, which will cause mass congestion and significantly increase pollution.</p> <p>* West Berkshire wants to achieve a carbon neutral society. How can this be achieved with this proposal, which doesn't lend itself to being able to live without a vehicle. It is too far from the station and town centre for people to reasonably live without a vehicle.</p> <p>* It is also being built on multiple fields removing the green spaces that my family and I, and others in Thatcham currently enjoy.</p> <p>* This will also have an impact on nesting birds and many other species that live in the area.</p> <p>* I also see no consideration of school availability, no community centres for the area, no doctor's surgeries. The schools are doctors surgeries are already full, especially The Kennet school as many</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>Thatcham residents already have to send their secondary age children to schools in Newbury as the Kennet is full.</p> <p>For all of the reasons mentioned above I am against this proposal.</p>	<p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and</p>

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		<p>Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>
Melanie and Stewart Rickerby (lpr2008)	<p>The proposed new development is situated across the road from our property where the new flood defence has been complete.</p> <p>We are objecting-</p> <ol style="list-style-type: none"> <li>1. The flood defence was built to alleviate the problems experienced in the past. Any further development will increase the surface water which will have to be directed into streams and channels south of the flood basin. Any increase in the water flow will accelerate the erosion. We also understand that the flood defence and beyond is part of the water table.</li> <li>2. Floral Way to A4 and A4 to Pipers Way cannot cope with normal, pre covid traffic volumes at peak times. We have experienced on many occasions where the traffic is queued along Floral Way, past Foxglove Way from Harts Hill Road. Then repeated at the junction with the A4.</li> </ol>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the</p>

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	<p>This has a knock on effect and causes queuing in Foxglove Way.</p> <p>The roads on the boundary of the proposed development will not cope with increase in traffic that 2500 houses would bring.</p> <p>3. West Berkshire are not required to provide 2500 houses extra. There are empty properties and other small developments with in West Berkshire. Also there are empty commercial properties in the area which have been so for years.</p> <p>4. The infrastructure in Thatcham has been neglected and although there are promises in all new developments these never seem to happen. These include, schools, doctor's surgeries, and upgrade of water treatment.</p>	<p>2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p>

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		<p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
John Brims (lpr864)	<p>We strongly object to the proposal to build 2500 homes in NE Thatcham (THA20).</p> <p>It is clear that the inclusion of this site has only been made due to the removal of the Garden Town site at Grazeley. West Berkshire Council (WBC) has not provided satisfactory evidence for this removal.</p> <p>We believe the housing requirement for this plan period has now been confirmed at approximately 8.721 houses of which WBC has identified</p>	<p>The proposal for a garden town in Grazeley was located in the administrative areas of Wokingham Borough Council and West Berkshire Council with the majority of the site located in the former administrative area. Due to the legislative change which has caused emergency planning requirements around the Atomic Weapons Establishment at Burghfield to be extended, the area around Grazeley is now within this area. As a result, the Defence Nuclear Organisation, part of the Ministry of Defence, objected to the Grazeley garden town proposal within the Wokingham Local Plan and requested its removal and due</p>



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	<p>8,114 before the inclusion of THA20. It is very clear that the requirement can either be satisfied by other means or a much smaller development in Thatcham.</p> <p>The last local plan period to 2026 was meant to allow Thatcham to regenerate. We can see no evidence of this being achieved. Thatcham requires a comprehensive town plan to bring together the past developments and the future plans into one. This piecemeal approach only leads to a totally unsatisfactory conclusion that is to no-ones benefit.</p> <p>We have lived in West Berkshire for over 40 years and the road infrastructure to the East of Newbury has hardly changed in all that time and the volume of traffic has increased many fold.</p> <p>In July 2007 we saw the damage caused by the flooding to Thatcham. Many experts are saying that there is not enough detail within the plan to consider the effects of such a development in this area will have on the rest of Thatcham.</p> <p>We are Bucklebury parishioners and further object to the proposal due to the impact it will have on:</p> <p>1. The Strategic gap between Thatcham and Upper Bucklebury will be all but removed. Floral Way was meant to be the northern boundary for development in Thatcham and this should be maintained. The land in north Thatcham rises gently towards the ridge along Burdens Heath and Cold Ash towards the boundary of the AONB. This gradual change from the urban area of North Thatcham to the AONB must be maintained.</p>	<p>to the extension of the emergency planning requirements it was also not carried forward through the West Berkshire LPR.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes</p>

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	<p>2. The northern edge of this proposed development is within 600m of the AONB. This development will have a major adverse impact on the AONB and its setting.</p> <p>3. Traffic is already a major issue in Bucklebury Parish. The additional traffic from this development will have a significantly detrimental effect on the parish particularly along Burdens Heath, through Upper Bucklebury and Chapel Row. More widely it will have a damaging effect on Cold Ash and Bradfield. It will possibly bring more traffic onto narrow rural roads as road users will try to find alternative routes to avoid the blockages. More and more road users will take alternative routes to avoid the A4 at peak times as the traffic using it is well beyond its capacity.</p> <p>4. The impact this development would have on Bucklebury Common and its wildlife. We have seen very clearly over the last 12 months that people need to get out for their wellbeing. Bucklebury and its environs is a perfect location for people to be able to do this but it also needs protection. There is nothing in this local plan that addresses this issue, we know only too well that in the future we must protect the environment. This must be part of the plan.</p> <p>We believe this plan needs reappraisal in the light of new information, the current economic situation and how the pandemic may change the way we live in the future. These issues cannot be ignored, the last 12 months has been a game changer.</p> <p>We hope that WBC reconsiders its proposal with the considerable weight of public opposition to this proposal. We will continue to object to this proposal and fight for a more sensible approach to the protection of the strategic gap, the AONB and for a much more sensible approach to the future development of Thatcham.</p>	<p>The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a</p>

Respondent (with lpr ref)	Response	Council Response
		<p>significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Adrian and Marilyn Elsey (lpr2009)	<p>I wish to register my objection to the proposed development of the above sites for the following reasons:</p> <ol style="list-style-type: none"> <li>1. We were made aware of this application/ consultation by my daughter in Bucklebury and have not received any information or correspondence from West Berks Council (WBC). We believe that the consultation period should be extended and ALL West Berks residents living in close to proximity to the A4 between Theale and Newbury should be formally written to, included and invited by WBC to comment.</li> <li>2. As elderly residents, we regularly use the West Berks Community Hospital which we access via the A4 and which we find is an extremely valuable asset to the local community. We feel that this development will put a huge increase in use of this facility resulting in longer waiting times and congestion in the car park.</li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill</p>

Respondent (with lpr ref)	Response	Council Response
	<p>3. We also regularly use the country lanes between Maidenhatch and Upper Bucklebury and fear that these will become even more of a 'rat run' than they are already</p>	<p>Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p>
<p>Mr and Mrs Brown (lpr1644)</p>	<p>This is a heartfelt rejection of the plan being discussed, I live at &lt;personal information removed&gt; and have been here since this site was built over 25 years + and if you have lived here since the beginning you would understand that this idea is NOT ludicrous, even trying to get off this close in the mornings is challenging, my garden backs on to Floral way and it is not pleasant sitting in the garden spring / summer because of the traffic noise abs speed of traffic travelling this road as lots of people use this road to escape the main road!</p> <p>I have lived in Thatcham for 35 years and when Dunstan park was built there was talk of a GP surgery, school etc nothing materialised.</p> <p>Currently 2/3 weeks for a Doctor or GP appointment, Thatcham Broadway a ghost town, Thatcham station no bridge! (sometimes waiting there for 20-30 mins )!</p> <p>There are things that need to be put in place before building NEW affordable homes!!!</p> <p>Losing the lovely fields to walk or to view would be a travesty and my family for one will not be staying if this build proceeds.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected</p>

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		to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’
David Hughes (lpr2010)	<p>Thatcham cannot absorb that many houses, for people coming out of Siege Cross it will make it almost impossible to join the A4.</p> <p>If anywhere needs some more Houses it's Newbury, Thatcham has been completely over developed.</p> <p>There are nowhere near the facilities to support that amount of housing.</p> <p>The traffic and carbon footprint it will create will be massive.</p> <p>NO</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report</p>

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		<p>for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>
Sam Weedon (lpr2180)	<p>I would like to strongly register my OBJECTION to the proposed full development of the above sites for the following reasons.</p> <p>It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</p> <p>It would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=0</a>) page 22, stating <b>“particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”</b>.</p> <p>A previous application was rejected by the Secretary of State in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>

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	<p>are WBC now considering this site in light of the previous objection, what has changed and knowing this has been refused once why have massive funds been spent thus far?</p> <p>It is a massive over development of the countryside in one area which consists of rolling hills and farmland. The reason stated is that 85% of West Berkshire is AONB. WBC has previously built on AONB and AONB status can be changed with government approval, and as it allegedly the government driving this would they not be more open to changing some AONB status ?</p> <p>It will have a significant impact on traffic in the area and especially on the route into Thatcham and Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <p>This will significantly impact the freight traffic using the industry site at Thatcham</p> <p>It will significantly increase the traffic on the back route (rat runs) which are not designed for large traffic volumes.</p> <p>Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation. Traffic in Upper Bucklebury increases considerably each time there is disruption on the A4 and the development will significantly increase traffic, especially during the morning rush hour as pupils from the village walk to school.</p> <p>It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood</p>	<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

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	<p>plain. Why build on an area where flood alleviation has already been installed to protect Thatcham residents?</p> <p>It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury. There will also be decades of disruption through the construction phase.</p> <p>There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>Schooling – this will obviously have an impact on local schools (and traffic). Current indications are that KS1 children volumes are decreasing yet the plan includes a proposal for 3 new schools. Will these be built before or after the houses? Build it before and it will poach children from local schools, such as Upper Bucklebury which will make that unsustainable (as is happening in Newbury with the new school on the college site). Build it after and the local schools will be overwhelmed beforehand. If the development is spread across the region there is a much greater chance of the load being spread out.</p>	<p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>



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Mrs C Coles (lpr1645)	<p>I would like to submit my objections to the building of 2500 new homes in Thatcham North East development proposal.</p> <p>Although I appreciate more housing is required I feel this development goes against the Government Green Policies. We are requested to plant more trees, to use less fuel and minimise our carbon footprint. Surely there are some brown sites that can be utilised instead or taking green fields, potential food growing areas.</p> <p>This proposed development will generate at least two more cars per property on our already overcrowded roads. To access the railway station most likely cars will be used to get there and parking already is at a premium. The queues at the crossing gates are already heavy.</p> <p>There is obviously current pressures on the Thatcham doctor's surgeries as many Bucklebury residents who were registered at Thatcham were transferred to Bucklebury Chapel Row practice, now making it much more difficult to get appointments there. Hospital services at Newbury however good are minimal and Reading is a good distance away.</p> <p>Until comparatively recently Bucklebury suffered from cuts to water and electric supply. Are Thames Water and SSE able to supply sufficiently to keep proposed new development and Bucklebury adequately maintained bearing in mind gas is to be phased out?</p> <p>It has been proven in this pandemic that the countryside is vital to mental health. Why then deprive existing residents of Thatcham and Bucklebury this 'green lung' on their doorstep? Living in &lt;personal information removed&gt; I am aware how recently many more people</p>	<p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to</p>

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	<p>access the land as a walk or cycle ride and proposed housing would cease to make it a therapeutic walk in the countryside.</p> <p>It is with these observations made that I object to the proposal to build.</p>	<p>local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p>
Toby Quirk (lpr2182)	<p>I would like to formally complain about the planning proposal in North-East Thatcham. The building of this site will have a large impact on pollution, traffic and flooding. In addition to this, the natural beauty of the surrounding areas will be lost. This will therefore have a negative effect on the overall functionality of Thatcham as a town as there will be an overload of people which the town cannot cater for. I strongly believe that this idea should be reconsidered and placed on a brownfield site where it has fewer environmental effects. The greenfield sites should</p>	<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised</p>

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	<p>not have even been considered. I hope you take this into consideration, I believe I speak for the majority of the community.</p>	<p>following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>

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		<p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Robert Lyle (lpr2183)	Our concerns on the proposed development on this scale concern volume of traffic and its impact on the environment, biodiversity, and local population. For example, these houses will generate considerable traffic with detrimental impact on the volume in the Parish. The A4 is already overloaded at peak times and new residents will look to find alternative routes, inevitably through the Parish, looking to access the	In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the

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	<p>A34 and the M4. The roads through these villages are poorly maintained, single carriageway and narrow, without pavements, unlit, and unsuited to additional traffic, many with blind bends and footpath entrances. Speeding is already a problem in the Parish and more cars will make a dangerous situation worse. The village roads are used by pedestrians, horses and cycles. Additional traffic makes accidents more likely and will endanger children walking to school. More traffic will be using the already problematic level crossing in Thatcham.</p> <p>Bucklebury Common, one of the few remaining areas of lowland heath lies just a kilometre or so to the north-east. It is well known for some special birds in particular the nightjar, but also the woodlark, tree pipit, stonechat and woodcock. These nest on the ground are very susceptible to disturbance especially by dogs, e.g. the disappearance of lapwing and little ringed plover at Greenham Common as nesting birds. The development would put much more pressure on the heath and make successful breeding of these species much less likely. This site is already subject to considerable recreational pressure. Heathland is a priority habitat identified in the Berkshire Local Nature Partnership Biodiversity Plan, and holds breeding populations of two of the priority species in the plan. In order to have a healthy environment, nature needs space to rest, feed and breed, all of which are threatened if no corridors of sanctuary are available.,</p> <p>As no doubt the council is aware, lowland heath is a threatened habitat important for a number of species of wildlife. Its global distribution is limited, with the UK having about 20% of the world's remaining area. About 80% of the UK's lowland heath has been lost since 1800.</p> <p>The Covid19 pandemic has transformed the way people work, travel and their housing needs which would have significant impact on these proposals but there is no mention of this in the proposals. Furthermore, taking WBC's own housing demand figures, these show a need for less than 1700 homes not the 2500 proposed. There are numerous brown</p>	<p>A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p>field sites in and around Newbury which could be developed without the problems associated with the current proposal, including many empty office sites, which may be suitable for conversion. Has this idea been explored fully?</p> <p>Demand for doctor surgery services locally is high, and more houses will increase the strain on already oversubscribed provision.</p> <p>Since leaving the EU, home food production will need to be increased and priority given to agricultural development, as there is a finite supply of suitable land. In this area, certainly there are other sites suitable for housing, but not agriculture.</p> <p>In summary, I have serious concerns about this housing proposal, which seems to minimise the impact on West Berkshire, Thatcham and especially the village of Upper Bucklebury, which will suffer increased traffic, a steady flow of visitors, inevitable damage to the local environment, wildlife and nature, which currently benefit the whole community and wildlife in general and increase strain on local services. Written strategic objectives on nature are absent, and no obvious priority is attached to the natural environment, biodiversity or nature conservation, all of which will be lost to the local population</p> <p>In conclusion, the SP17 proposal is disproportionately big, poorly sited and would have detrimental impact on the surrounding population, infrastructure and environment. There are alternatives and these should be considered.</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p>

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		<p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Caroline and Steve Miller (lpr2293)	Having heard about the proposed development I wanted to express our deep concerns for these 2,500 houses. As residents of Midgham, we enjoy our peaceful, rural part of West Berkshire and these are among the reasons we moved here 8 years ago. We are astonished to hear of these proposals and can't quite believe anyone would want to ruin this beautiful countryside. We are regular walkers around the area proposed for development and therefore this will completely change our way of life - please do not allow this to go ahead!	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p>

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		The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'
Richard Spreadbury (lpr1646)	<p>I would like to object to the proposed development of 2500 new homes in Thatcham on the GREEN SPACE on the edge of Thatcham on Floral way Dunston Park area. Thatcham is already bursting at the seams regarding the schools, doctors and dentist. The railway crossing in particular couldn't take another massive development, there is too much traffic already for it to cope with. There is always queues with large tail backs which spread over huge distances, from the railway station to the roundabout on the main A4 road and on the other side of the railway to the Burys Bank road junction and further. There can be 3 or 4 trains to wait for &amp; then you faced with angry, impatient drivers skipping the queues where they can, taking chances so they are not waiting any longer than they already have, which will cause an accident.</p> <p>This proposed development is to be built on lovely green space, which there is hardly any left in Thatcham! We want the green space to escape, explore, exercise with are families and for our wellbeing and already its well-used to do this with the over populated residents of Thatcham. This is very noticeable during the lockdowns at the moment, having nowhere to go to avoid lots of people to do the simple pleasures of walking. This proposed planning site area must be homes to so much wildlife, which is so important to protect &amp; look after it. People have come much closer to nature and have enjoyed all the wildlife there is on offer around our areas in lockdowns, and we need to protect their habitats.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the</p>



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		<p>development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the loss of a recreational resource, within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB. This will be accessible to all.</p>
Willie Hartley Russel (lpr2196)	<p>I am writing to object to the proposed development of 2,500 new houses in North East Thatcham.</p> <p>As the owners of the &lt;personal information removed&gt; (which we manage in conjunction with West Berkshire District Council) we are concerned about the resultant impact the additional population from this development will have on the ecology, flora and fauna of Bucklebury Common. In our opinion, this development will have a long detrimental effect on this unique open space in an Area of Outstanding Natural Beauty.</p> <p>We are also concerned about the size and scale of the development, the effect it may have on flooding as well as the traffic impact.</p> <p>The development is not appropriate for this part of West Berkshire and should be refused.</p>	<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>

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		<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for</p>

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		<p>both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Lesley Quirk (lpr1909)	<p>As a resident of &lt;personal information removed&gt; in Thatcham I would like to share my <b>objections</b> to the Thatcham North East Development proposal. Whilst I recognise the need for increased housing in West Berkshire and government targets, the chosen site for such a large project appears misguided. <b>I am strongly against the proposals</b> and believe that they should be reconsidered immediately.</p> <p>Thatcham already has a high flood risk, with alleviation systems being created. This risk would predictably increase due to the underground water systems in the proposed site area and the movement of ground, alongside the residential streets. The natural landscape, including the designated ANOB around the proposed site, would definitely be negatively affected by the project. Reduction of green space should always be resisted to maintain wellbeing, physical opportunities and natural ecosystems.</p> <p>Noise, light and air pollution would increase. Traffic congestion through Thatcham on the A4 and on the route to the train station is already high, particularly at peak times, and especially when there are difficulties on the M4. It is difficult to see how this could be catered for. Thatcham does not need this increased volume of traffic, more roundabouts, widened carriageways and daily disruption. There would be a negative impact on the quality of life of present Thatcham residents.</p> <p>It has previously been agreed that the land between Floral Way and Bucklebury provides a natural gap, creating a community feel for both communities. The elevation of the land suggests the possibility of three</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and</p>

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	<p>residential areas that would loom over the rest of Thatcham, becoming an eye sore rather than part of a connected town. The sheer size of the proposal would undermine the present town. Thatcham already has a high percentage of residential use and needs a different focus to improve its infrastructure, such as developing the high street and sports facilities. Is there really such a demand for housing here? What other possible sites are there in West Berkshire that would not create the same negative impact?</p> <p>As already stated, I am <b>opposed</b> to the proposals and hope that you listen carefully to the voice of the residents of Thatcham and the surrounding villages. I urge you to rethink.</p>	<p>Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
<p>Christopher Morgan (lpr2199)</p>	<p>I am writing to voice my objections to the proposed NE Thatcham development (Policy SP17). <i>(personal information removed)</i></p> <p>I wish to <u>object</u> on the grounds of:  Increased Volume of traffic in the area  Increased risk of flooding  Impact on an already-struggling local water supply  Impact on AONB</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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		<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Mr and Mrs Henwood	<p>We would like to object to these houses being built at Thatcham because it will cause so much more traffic through the rural villages of Bucklebury and Bradfield Southend.</p> <p>We live on &lt;personal information removed&gt; in Bradfield and already we are used as a "rat run" between Thatcham and Reading, our quiet village road is already overloaded with traffic from other new developments in Thatcham.</p> <p>We understand that they are going to build schools but it will also cause extra pressure to local hospitals and doctor's surgeries.</p>	<p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Gavin Bush (lpr2025)	<p>I am writing to you in order to strongly object to the planned housing development in North East Thatcham (SP 17). My family have resided in Upper Bucklebury for ten years and my Dad runs a local business in the village.</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end,</p>

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	<p>I agree with the following words from another local resident:</p> <p><i>“I object on several Grounds as follows:-</i></p> <p><i>Environment</i></p> <ul style="list-style-type: none"> <li>• <i>The development would harm the environment surrounding Bucklebury</i></li> <li>• <i>The development would cause a dramatic reduction in the visual and physical separation of North Thatcham and Bucklebury Village, with the reduction and even the loss of a rural gateway to Bucklebury.</i></li> <li>• <i>The rural views from floral way, A 4 and other areas of North Thatcham which are , much valued by the resident, will be removed</i></li> <li>• <i>The development will be highly visually intrusive from many vantage points looking south</i></li> <li>• <i>The development will destroy area of tranquillity and agricultural land between North Thatcham and Bucklebury.</i></li> <li>• <i>I fear that the Bucklebury primary school will become surplus to requirements if they build a new primary school on this development and the Bucklebury primary school will close and be developed.</i></li> </ul> <p><i>Traffic</i></p>	<p>any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site. With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there</p>



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	<ul style="list-style-type: none"> <li>• <i>There will be a huge increase in the traffic flow through our village especially at peak times</i></li> <li>• <i>There will be increased traffic flow on to Floral way, and will affect the access onto the A4</i></li> <li>• <i>There will be strain on the local infrastructure</i></li> <li>• <i>There will be an increase in traffic into the village and to Bucklebury primary school as many north Thatcham residents send their children to the school</i></li> </ul> <p><i>Flooding</i></p> <ul style="list-style-type: none"> <li>• <i>There is a proven flood risk to residents south of the application site despite the flood alleviation measure already installed.</i></li> </ul> <p><i>Sustainability</i></p> <ul style="list-style-type: none"> <li>• <i>Car dependency is likely to be very high at this location, and therefore this site fails on the sustainability criteria.</i></li> <li>• <i>There are very few employers close to the site leading to the obvious increase in car usage.</i></li> <li>• <i>Secondary Schools are not within walking distance.</i></li> <li>• <i>Walking distance to significant services too great.</i></li> <li>• <i>Public transport remains non-viable option due to limited timetable and frequency</i></li> </ul>	<p>were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Though delivery on a particular site can never be guaranteed, the Council closely monitors the position, annually updating the Five Year Housing Land Supply. At present the Council is able to demonstrate a supply of 7.3 years for the period to 2026.</p>

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	<p><i>Alternative sites within West Berkshire</i></p> <ul style="list-style-type: none"> <li>• <i>Over Development in one area is lazy planning policy and such places all the burden and the need for resources in one place and also they will become over stretched.</i></li> <li>• <i>I believe that there are other more suitable sites that are already available within West Berkshire, and this is just to name a few</i></li> </ul> <ul style="list-style-type: none"> <li>◦ <i>Land at the junction of Turnpike Road and Benham Hill next to the community hospital</i></li> <li>◦ <i>Land around Henwick Farm off Turnpike Road</i></li> <li>◦ <i>Land in Theale off the high street Hoad way and M4,</i></li> <li>◦ <i>Theale - Lakeside, The Green</i></li> <li>◦ <i>Tilehurst - Land off Pincents Lane formally the golf course</i></li> <li>◦ <i>Hambridge Road - form Gas Holdr site.”</i></li> </ul>	<p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>
David Marsh (West Berkshire Green Party) (lpr1840)	<p>We believe the proposed large-scale development is contrary to SP5, SP8, SP10 and SP11. Thatcham lacks the infrastructure for the existing number of properties, never mind additional ones. We reiterate our view that the Colthrop industrial estate should become a mixed housing/employment district similar to the proposals for the LRIE in Newbury but with a higher weighting for affordable and social housing. If significant development is earmarked for Thatcham, it presents a once-in-lifetime opportunity to fund a much needed bridge to replace the rail crossing. It would be remarkably short-sighted if the council did not explore this avenue.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can</p>

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		<p>delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.</p>
Stephen Harris (lpr2026)	<p>I wish to strongly register my objection to the proposed development of 2500 houses along the A4 and Floral Way in Thatcham. My reasons for objecting are:</p> <ol style="list-style-type: none"> <li>1. The communication and consultation around the development is severely lacking, and no information has been sent to affected residents by West Berkshire Council. Some Upper Bucklebury residents have become aware through various means and the vast majority are against this development and many have already registered their objections. However there remains a significant number who are not aware and consequently should be furnished with full details of the proposal. WBC are in my opinion negligent in this process and the consultation period should be extended and all residents should be formally written to.</li> <li>2. It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This document is approved and agreed with WBC and should be considered as supplementary planning consideration. It is not mentioned in the WBC documentation.</li> <li>3. The proposed development would effectively join Upper Bucklebury with Thatcham, which has all but happened at Cold Ash effectively removing the rural aspect of the area. This is actually stated in the WBC documentation (<a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=">https://info.westberks.gov.uk/CHttpHandler.ashx?id=49836&amp;p=</a></li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to</p>

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	<p>Q) page 22, stating “particularly as development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern”. WBC are therefore suggesting that the Parish of Bucklebury should maintain its identity but the proximity of the development is in contradiction to WBC’s own intentions.</p> <p>4. A previous recent application was rejected by the secretary of state in 2017 <a href="https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html">https://www.newburytoday.co.uk/news/news/22093/very-strong-message-to-developers-after-thatcham-appeals-turned-down.html</a>. Why are WBC now considering this site in light of the previous objection, what has materially changed in this short period of time and knowing this has been refused once why have massive funds been spent thus far ?</p> <p>5. In the Newbury Weekly News the following statement is attributed to Hilary Cole. However, the statement flies in the face of what has actually happened, is factually incorrect and despite the indication of wishing to work with the community the statement infers that the decision has already been made.</p> <ul style="list-style-type: none"> <li>o The council’s executive member for housing, Hilary Cole (Con, Cold Ash and Chieveley), said: “We are very keen to work with the local community because it’s such a big proposal and development for Thatcham. “We have taken a conscious decision to do this around Thatcham so it will deliver the infrastructure we need. “We feel that Thatcham is best placed to take a development of this size.”</li> </ul> <p>6. The proposed development will have a significant impact on traffic in the area and especially on the routes into Thatcham, Newbury and towards the station which are already heavily congested at busy times and in the event of any minor traffic disruption. This will significantly impact the freight traffic using the industry site at Thatcham and inevitably significantly increase the traffic on alternate 'rat run' routes which are largely</p>	<p>enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and</p>

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	<p>small rural roads and lanes and not designed for large traffic volumes. Traffic and speeding in particular through Upper Bucklebury is of a major concern due to the primary school. With an increase in 10% this will only worsen the situation.</p> <p>7. It is cited that there cannot be development on the Kennet flood plain, however there are multiple examples where this has already been done (most of Thatcham was originally a flood plain), this is extremely hilly land which is almost certainly as unsuitable to development as the flood plain.</p> <p>8. It will significantly increase the noise and light pollution to the Bucklebury Parishioners – there are no street lights in Upper Bucklebury.</p> <p>9. There is no evidence that this will enhance Thatcham town centre (or indeed Newbury). The development of the old Army Base by the Station didn't add any amenities and we have seen the slow decline of the town centre over the last 20 years despite the area growing.</p> <p>10. The suggested rationale for such a large development has become out-of-date due to changes in working and social habits and activities due to the COVID 19 pandemic. Many organisations are reviewing their long-term plans for remote workers, making it highly likely that travel patterns and housing requirements will be quite different in the future. Committing to such a large scale development now is highly risky and could prove extremely expensive for all concerned. At the very least it would make far more sense to revisit the plan once the long-term effects of the pandemic are known and understood, to ensure that any development meets actual requirements at that time</p>	<p>Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Paula Saunderson (lpr965)	<p>Strongly object on Environmental issues</p> <p>Increasing Flood Risk to other nearby areas</p>	<p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and</p>

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	<p>Highways - lack of railway bridge</p> <p>Air Pollution</p> <p>Density</p> <p>Travel &amp; Traffic Plans</p> <p>Loss of Green fields</p> <p>NIMBYISM</p>	<p>Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is</p>

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		<p>not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>Policy SP1 Spatial Strategy sets out the density requirements for particular areas.</p>
David Southgate (lpr2027)	<p>We have been a resident of Upper Bucklebury, and have lived in the village with our family for 32 years. We are writing to voice our objections to the proposed NE Thatcham development (Policy SP17). We wish to strongly object on the grounds of:</p> <p>a. Breaching of the Floral Way settlement boundary Extending Thatcham to the north-east will continue to destroy the rural areas so highly prized by West Berkshire in all its planning material. Detractors' (to the distinctly rural environment of the area) are described - each one of these will be made worse by this development. It is written</p>	<p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East</p>

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	<p>in the Bucklebury Vision that a green belt should be maintained between Upper Bucklebury and Thatcham.</p> <p>b. Traffic congestion around NE Thatcham Thatcham’s traffic issues are well-understood by any local resident, often leaving cars sitting in traffic queues along the A4 or at the level crossing for considerable lengths of time, hardly helping the council’s carbon net-zero and healthy air ambitions. The rail crossing is already a disaster and the lack of a bridge in the proposal will further congest the town’s roads. Rail parking and volume provision is inadequate.</p> <p>c. Impact on AONB through loss of separation from urban settlements</p> <p>As mentioned in (a), above, breaching the settlement boundary will have huge impacts on the AONB, both in terms of the rural character, and materially on the quality of life in those settlements adjoining THA20. Aside from the ‘loss of greenfield land’ the plan states the ‘site is of such a scale that it would provide new services and facilities that would be available to surrounding settlements like Cold Ash and Bucklebury’, which clearly indicates the impact it will have, just from the point of view of facilities, potentially threatening the local shop, the local school etc., but also in terms of bringing Thatcham closer.</p> <p>d. Increase in traffic (pedestrian / cycle / automotive) The change will potentially add 60% more traffic to local lanes (which have no pavements), and eroding still further the fragile commercial, cultural and environmental nature of the settlements within the AONB. The proposal is designed around car use as so will as a result significantly add to traffic. Increased construction and through traffic has made the roads extremely dangerous to walkers, cyclists and horse riders with no regard by drivers for these other road users. Any more houses would worsen the problem.</p> <p>e. Phasing We are deeply concerned on the impact of the phasing of the development on schools, medical provision, work, leisure and retail facilities in Thatcham. Existing capabilities are full or inadequate and any development is likely to break current capacity before provision of</p>	<p>Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed</p>



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	<p>new facilities is made.</p> <p>f. Failure to acknowledge housing needs based on household type. Given the housing mix suggested by the forecast data, the proposal seems completely out of touch with the reality of local needs. In light of the changing nature of town centres, as retail moves on online, and an ageing population needing access to public transport, does it not make much more sense to repurpose unused commercial property for residential use, and in doing so change the declining nature of the high street, provide easier access to local facilities (especially for the ageing population) and reduce dependency on short car journeys clogging our streets and adding to the community’s carbon footprint? It also does not reflect the growing need for single occupant dwellings.</p> <p>g. Destruction of ancient forest land, fragile ecosystems both through direct and adjacent loss of habitat, threatening biodiversity and general ecological well-being</p> <p>h. Lack of meaningful and timely democratic engagement in the review process, and lack of thorough analysis of key elements of the proposal. Our final point is that there has been a significant lack of community engagement to date in the review process.</p> <p>To re-emphasise we strongly object to the proposed development and urge WBC to reconsider their proposals.</p>	<p>by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>Concern regarding infrastructure provision and phasing are noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p> <p>In regards to ancient woodland, Policy DM14 makes clear development should buffer any ancient woodland it affects by providing sufficient space to afford surrounding protection and allow for future growth where possible. Development near ancient woodland will be treated in accordance with the latest 'standing advice' from Natural England and the Forestry Commission. This states that there should be a buffer of at least 15m from the boundary of ancient woodland to avoid root damage. The precise buffer would need to be determined by further assessment and detailed design at the planning application stage.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>

Respondent (with lpr ref)	Response	Council Response
Amanda Pope (lpr1960)	<p>I wish to register our objections and concerns to the proposed development. Building or developing land right up to the wooded areas bordering Upper Bucklebury is extremely detrimental for the vast array of natural habitats and wildlife species that co-exist in the last stronghold of green belt bordering Bucklebury Parish.</p> <p>Thatcham has in recent years soaked up a huge amount of additional mass housing, and there must be other sites in West Berkshire that are currently brown field sites where this could be an alternative.</p>	<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p>

Respondent (with lpr ref)	Response	Council Response
<p>Susan Scotland (lpr1911)</p>	<p>I first moved to Thatcham 35 years ago. I have seen this town grow and grow with no extra doctor's schools or general hospital. Traffic levels increase what about pollution. Thatcham doesn't need or can cope with more housing. Refurbish old properties to create homes. Save our green spaces</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>

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		<p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
<p>Pete Murray (lpr1912)</p>	<p>I wish to register my objection to the planning 2500 house development in Thatcham known as THA20</p> <p>The main reason is that the project is ill thought through, has had little consultation with the local public to cover the impacts to traffic, safety, public infrastructure, health and wellbeing as well as little consultation with the surrounding parishes. The impact will be far reaching, not just to create a sprawling town in Thatcham but will also impact separation with Bucklebury, impact heavily Cold Ash traffic flows and resources as well as countless other important factors. I could go on and will happily present a detailed case and reply if needed.</p> <p>Please accept this as a formal objection.</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed</p>

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		<p>by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p>
Maureen Morgan (lpr1997)	<p>I am writing to voice my <b>objections</b> to the proposed NE Thatcham development (Policy SP17). I am a resident of Upper Bucklebury, and have lived in the village with my family for 9 years.</p> <p>I wish to <b>object</b> on the grounds of:</p> <p><b>Increased Volume of traffic in the area</b></p> <p><b>Increased risk of flooding</b></p> <p><b>Impact on an already-struggling local water supply</b></p> <p><b>Impact on AONB</b></p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to</p>

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		<p>local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has</p>

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		<p>undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Simon Quirk (lpr1913)	<p>As a resident of &lt;personal information removed&gt; in Thatcham I would like to share my <b>objections</b> to the Thatcham North East Development proposal. <b>I am strongly against the proposals</b> and believe that they should be reconsidered immediately. Despite the potential need for more housing, the chosen site for such a large project appears misguided.</p> <p>It has previously been agreed that the land between Floral Way and Bucklebury provides a natural gap, creating a community feel for both communities. The elevation of the land suggests the possibility of three residential areas that would loom over the rest of Thatcham, becoming an eye sore rather than part of a connected town. The sheer size of the proposal would undermine the present town. Thatcham already has a</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st</p>



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	<p>high percentage of residential use and needs a different focus to improve its infrastructure, such as developing the high street and sports facilities. Surely there must be other possible sites in West Berkshire that would not create the same negative impact.</p> <p>With alleviation systems being created, Thatcham still has a high flood risk. This risk would predictably increase due to the underground water systems in the proposed site area and the movement of ground, alongside the residential streets. The natural landscape, including the designated ANOB around the proposed site, would definitely be negatively affected by the project. Reduction of green space should always be resisted to maintain wellbeing, physical opportunities and natural ecosystems.</p> <p>Noise, light and air pollution would increase. Traffic congestion through Thatcham on the A4 and on the route to the train station is already high, particularly at peak times, and especially when there are difficulties on the M4. It is difficult to see how this could be catered for. Thatcham does not need this increased volume of traffic, more roundabouts, widened carriageways and daily disruption. There would be a negative impact on the quality of life of present Thatcham residents.</p> <p>As a result of this, I am <b>opposed</b> to the proposals and I urge you to rethink.</p>	<p>February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>
Patrick Bowing (lpr989)	<p>Dear Sirs,</p> <p>I am all for much needed housing development, but this one is just too large and ill-thought out. There is simply not the infrastructure to support it, whether schools, doctors, hospitals, roads, town centre and station parking, pubs and sport and leisure facilities. This development will increase the present 28,000 population of Thatcham by 25-30% (8-10,000 people), whilst bringing approximately 5,000 more cars on to the A4, Thatcham's congested roads and country roads, particularly at peak</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>times, causing yet more traffic. Significantly, the A4 cycle lanes (cycling mentioned profusely in the draft) already looks to be a dismal failure.</p> <p>WBC should provide as a minimum the basic infrastructure first and only then put forward such a development proposal - not the cart before the horse! I have read the Q&amp;A section and was not re-assured by the answers given, particularly with regard to the Thatcham level crossing. If WBC does not prioritising the building of a bridge then the development should not go ahead. As it exists now, long queues encourage traffic delays and in consequence rat runs through narrow country lanes and villages, which cannot cope with more traffic.</p> <p>Then there is the West Berkshire Crematorium. The crematorium was built in 2006 to provide 'a quiet and rural setting' in the countryside, not 15 years later to be engulfed in the middle of a housing development. People's entrusted ashes have been interred/scattered within this peaceful 'rural' crematorium grounds and many living might consider it as a major betrayal or even sacrilege to build in any close proximity. The full planning permission on which the crematorium was granted might provide some insight?</p> <p>Besides this, no mention of the health risk of the crematorium is made. According to some statistics one cremation can emit as much carbon into the air (besides other serious toxins) as 3,500 passing cars! Does West Berkshire Crematorium use deNOx technology and what are its carbon emissions? Would any informed family buy a home and bring up their children in close proximity or down wind of a crematorium? I think not. No information is given in the draft.</p> <p>Nevertheless, I would support some smaller development subject to acceptable existing infrastructure in the Dunston Park area and down to siege Cross Farm, but no further along the A4 corridor.</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual</p>

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	<p>If such a development went ahead it would also totally destroy the present spectacular rural views from Greenham Common across the Kennet Valley.</p>	<p>components of the site in relation to individual planning proposals. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site. With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Samantha Allen (lpr2012)	<p>I would like to formally register my objection to the proposed development of 2500 houses at NE Thatcham for the following reasons:</p> <ol style="list-style-type: none"> <li>1. It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury.</li> <li>2. The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham.</li> <li>3. It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If developments of this scale are approved there will not be any open rural areas left for future generations to enjoy.</li> <li>4. The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain area.</li> <li>5. The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and ill-conceived.</li> <li>6. This development will have a significant impact on traffic levels and the associated pollution throughout the area, especially increasing:</li> <li>7.</li> </ol>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location</p>

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	<ol style="list-style-type: none"> <li>1. Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially as we have children who walk along this road to the Primary School.</li> <li>2. Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.</li> <li>3. Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested at busy times and in the event of any minor traffic disruption.</li> </ol> <ol style="list-style-type: none"> <li>1. It will significantly increase the noise and light pollution to the Bucklebury residents. There are no street lights in Upper Bucklebury.</li> <li>2. There is no evidence that this development will enhance Thatcham town centre (or the area in general).</li> <li>3. It is not likely to attract new businesses to the area or create or significantly increase employment.</li> <li>4. The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development includes retail.</li> <li>5. This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are already overstretched.</li> <li>6. It will be another area of the environment that is destroyed with an immediate detrimental impact on protected wildlife and the destruction of natural vegetation.</li> </ol> <p>To conclude this development is unnecessary, inappropriate and ill-conceived and should be rejected.</p> <p><b>Observations</b></p>	<p>to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed</p>

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	<ol style="list-style-type: none"> <li>1. Awareness of this development/application/consultation was provided by the local community and not WBC. Furthermore, it is not clear at what stage this application has now reached.</li> <li>2. Why is WBC not writing to all residents to make them aware of this development and encourage/seek comments on the proposal from as wider audience as possible?</li> <li>3. Taking into consideration the scale of this development there has been a distinct absence of communication which is extremely disappointing.</li> <li>4. As a local resident I find the comment by Councillor Hilary Cole reported in the Newbury Weekly News that <i>“We are very keen to work with the local community...”</i> a pleasant surprise and I would be interested to know when it is going to commence.</li> <li>5. Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and Upper Bucklebury. The consideration of this approval now certainly seems to totally contradict this stated commitment.</li> <li>6. Finally, why is WBC are now considering this development when a previous application was rejected by the secretary of state in 2017?</li> </ol>	<p>by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council’s policy on pollution.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a ‘living document’ and will be updated regularly updated in consultation with infrastructure providers.</p>

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		<p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open</p>

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		<p>space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>
Kennet Secondary School (Mrs G Piper) (lpr2132)	<p>The Kennet School Academies Trust (KSAT) is the largest provider of educational services to the community of Thatcham and its surrounding villages. The Trust is exclusively focused on its key strategic objective of ensuring all young people in the area have access to the best possible education, throughout their school years, in order to have the greatest chance of achieving their full potential.</p> <p>The Trust is neutral on whether the proposed development should proceed. However, in reviewing the consultation document it is clear that significant attention needs to be paid to the local infrastructure required to support such a development, including the provision of educational services. The potential scale of the project clearly requires a holistic strategic view on how to deliver these services; not only in providing the long-term physical capacity required to support the growth in school-age population, but also in planning to meet the incremental demand as the earlier phases of any such development take place. It will also be important to recognise and protect the key role that schools play as hubs within the community, providing central locations for activities outside the school day. Above all else, any plans in this area must ensure that the delivery of education to the existing community is not disrupted.</p>	<p>In regards to comments raised in relation to the impact on schools, the site provides an opportunity to provide a 2.5 FE new primary school and for secondary provision, land to meet the impact of the development. Additional school provision is included in the IDP.</p>

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Rev. Julian Gadsby (lpr1000)	<p>Although I am very conscious of the need for more housing in the West Berkshire area, I do not believe that this current scheme is appropriate for the following reasons.</p> <p>1. Infrastructure. The plan to build 2,500 new homes on the edge of Thatcham will put enormous strain on local roads and surrounding villages. The proposal assumes that road users from the new development will largely use the A4 to get to the M4 and other surrounding larger roads. However, our experience has been that the A4 is already tremendously busy at peak times, and many commuters find alternative routes through the villages - in particular Upper Bucklebury. For example, the road from Upper Bucklebury to Cold Ash is not paved, and this will increase the danger for children and parents walking to school.</p> <p>The roads in the area are not well-maintained, as they are not main roads, and will be further damaged. However, plans to maintain and improve the infrastructure around these villages does not appear to be included in these proposals.</p> <p>The assumption, too, is that road users will use the route through the Thatcham Station crossing. However, long delays are not uncommon now, and will only get worse with increased usage. The proposal does not include a plan to build a road bridge over the railway line, which is a significant omission.</p> <p>2. As a local minister, I am surprised that little thought appears to have been put into the potential impact on the Crematorium and the need for grave spaces. May I ask whether this will in fact be considered? There is a need for communities such as this, if it were to go ahead, to have access to local churches and I would hope that this would feature in the space offered for needed facilities in the community.</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>



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	<p>3. What is being proposed is, effectively, a new town. However it will largely depend on the existing facilities (bar the schools) and amenities, which will be severely stretched. The plan must, I believe, include an improved Thatcham</p> <p>I would prefer to see the development spread more evenly across West Berkshire rather than concentrated in one area.</p> <p>If the proposal is passed I would like to see how the significant impact on local roads, and the potential danger to life, is addressed.</p> <p>I would also like to see that the proposal includes provision for improved amenities and facilities in the local area, in particular space given over, potentially, for the church to be able to minister to the new community.</p>	<p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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Duncan Dorroch (lpr1988)	<p><b>Overall:</b> What is very obvious from the various tables and maps is the extremely limited space that isn't declared as an 'AONB'. What is also spectacularly apparent is the inequitable distribution of new houses. Why are all available areas not being considered for additional housing? There are many towns and villages south of the M4 that have had no new houses allocated. I fully accept that additional houses are required but these must be allocated fairly across the region. In light of the current pandemic and Brexit, I would also question the validity of the housing demand figures. It was recently reported that 1.3 million people had left the UK. I would also ask why is the answer always Newbury and Thatcham?</p> <p><b>Traffic:</b> -The route West towards Newbury on the A4 is significantly urbanised and congested at all but the quietest times with slow journeys owing to traffic lights, junctions and weight of traffic and little hope of improvement. -The route South over the railway is severely restricted by the level crossing. Even without such a significant increase in Thatcham's population this route suffers severe congestion and improvement of this needs to be considered as part of the overall plan. -The route East down the A4 is expected to take the bulk of the traffic but is already congested at busy times.</p> <p><b>Thatcham Infrastructure:</b> Whilst the plans show there will be new primary and secondary education and medical facilities, when are these scheduled to be built? There has been no substantive development to Thatcham infrastructure in over 10 years with both secondary education and medical facilities overloaded. The station / train services are not adequate to cope with the significant increase in demand</p> <p><b>Flooding</b> Whilst there has been investment in flood defences elsewhere around Thatcham, there has been nothing around the Northeast of Thatcham. You are proposing to tarmac over large percentages of greenbelt so the</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially</p>

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	<p>run-off water will have nowhere to go apart from over the A4 and into the residential area. I would be happy to discuss if you require any further information.</p>	<p>higher numbers than the housing need based on the standard methodology.</p> <p>The location of development has been based on the following spatial strategy as set out in SP1: 'The overall spatial strategy for West Berkshire will deliver the spatial vision and strategic objectives for the District over the Plan period and inform the preparation of Neighbourhood Plans (NDPs). The strategy: directs development to areas of lower environmental value; optimises the use of previously developed land: optimises the density of development to make the best use of land whilst conserving; and enhancing the distinctive character and identity of the built, historic and natural environment.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>

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		<p>packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Helen Pratt (lpr1857)	<p>Bradfield Parish Council concurs entirely with the analysis and report produced by Bucklebury Parish Council in opposition to THA20. Expansion on such a vast scale without any highway infrastructure improvements, is totally unacceptable. The A4 / Bath Road struggled with pre Covid-19 traffic volumes. Any traffic flow analysis undertaken in 2020 will be flawed because of Lockdown restrictions. Bradfield Parish traffic flows have altered dramatically during 2020 as can be seen by the data collected during SID usage along South End Road through Bradfield Southend. Traffic from THA20 will use the rural roads in the surrounding parishes to try to escape the congestion from the main highways particularly when attempting an east / west destination. Bradfield Parish will be seriously impacted by additional traffic without investment into roads infrastructure. Many miles of 'commuter rat runs' are on narrow,</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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	<p>winding lanes, and with no footway for pedestrians walking between hamlets and villages. Union Road, for example, has high earth banks in narrow sections on bends. Less than half the roads length is wide enough to have carriageway segregation. There is flagrant disregard for speed limits be that along open roads or restricted speeds through villages.</p> <p>Traffic management will require major investment in the wider rural parishes to combat congestion, safety to road users, protection of pedestrians and reduction in the speed of vehicular traffic. Commuter traffic travelling east from the THA20 will swamp Upper Bucklebury and grid lock the village with the chicane arrangements for those travelling west through Upper Bucklebury to work in Newbury. Chapel Row and Bradfield Southend will be mere hindrances for commuter traffic as few slow down, even now, anyway! Englefield Parish will end up with a bottleneck at the junction of Common Hill Road and the A340. This notorious junction, the site of numerous accidents and many fatalities must be upgraded. Pre Covid-19, queuing back to Parkers Corner, particularly on wet mornings, was not unusual. As an escape from waiting, the use of Bostock Lane, a single track lane with 90 degree bends across Englefield Estate is many commuters preferred option, and all to join the snail pace procession on the A4 Bath Road.</p> <p>There is serious conflict with West Berkshire Councils AONB credentials. Promoting the encroachment of development right up to the edge of the AONB fails to show protection towards a precious resource. The imposition of light pollution from residential development at the edge of a 'dark skies' area is unacceptable.</p>	<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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		<p>In regards to light pollution, policy DM4: Environmental nuisance and pollution has been strengthened to ensure that all reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife. Applicants should adhere to the guidance on lighting provided in the most up to date Institute of Lighting Professionals (ILP) guidance notes, alongside other relevant local documents including the North Wessex Downs AONB 'A Guide to Good External Lighting' (2021).</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR also requires the submission of a lighting strategy.</p>
David Smith (lpr2151)	<p>I have huge concern over the planned expansion of Thatcham. I object on the following grounds,</p> <ul style="list-style-type: none"> <li>• Loss of greenbelt land and historic countryside</li> <li>• Loss of habitat and conservation land</li> <li>• Loss of ecology</li> <li>• Over expansion of Thatcham</li> <li>• Inappropriate site for development</li> <li>• Lack of proposed infrastructure to facilitate this development</li> <li>• Increase in traffic and pollution on already busy roads</li> <li>• Concern over flood and land drainage risk to existing properties in Thatcham</li> <li>• There are better sites available within West Berkshire to facilitate housing development, that will have far less impact on local people</li> </ul> <p>If I wanted to live in Thatcham then I would have brought a house in Thatcham. I want to live in a village, but this development will join Upper</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime</p>

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	<p>Bucklebury with Thatcham, subsequently leading to a loss of Village life and defined local boundaries. I can only assume that local councillors that support this, don't live in this area and would welcome their views on a development of this size on their doorstep.</p>	<p>focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance,</p>

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		<p>without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
<p>Bridget Wilcock (lpr2013)</p>	<p>I am writing to raise my objections and concerns to the proposed development of 2,500 homes in North East Thatcham.</p> <p>I was also very upset and surprised given the huge size of this development that I a lot of parishioners were unaware until very recently, I just cannot understand why was this not more visible. My concerns in brief are as follows:- 1) Traffic</p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council’s Statement of Community Involvement (SCI), on the Council’s website and in the local press and via notification emails to those registered on the Council’s consultation database.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as</p>



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	<p>There will be a huge increase in traffic into and through the village especially at peak times, as well as the surrounding villages, the current roads will not be sufficient to support this increased traffic volume, especially those used as 'rat runs'.</p> <p>Floral Way and the A4 will also be impacted.</p> <p>There will also be a strain on the local infrastructure.</p> <p>2) Flooding</p> <p>There is a proven risk to residents south of the application site despite the flood alleviation measure already installed.</p> <p>3) Infrastructure</p> <p>The proposal doesn't contain details of an increase in healthcare services, the local surgeries are already overstretched.</p> <p>It will obviously also impact on local schools.</p> <p>Thatcham station - the car park is already too small.</p> <p>4) Sustainability</p> <p>Car dependency is likely to be very high and therefore this site fails on the sustainability criteria.</p> <p>Secondary schools are not within walking distance</p>	<p>being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with</p>

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	<p>Public transport remains non-viable option due to the limited timetable and frequency.</p> <p>5) Upper Bucklebury</p> <p>The inevitable increase of visitors to our village/ parish / Bucklebury Common can only have a detrimental effect on our local environment, nature and wildlife, it already suffers from significant waste issues.</p> <p>It is cited in the Bucklebury vision and Bucklebury Plan to maintain a strong green belt between Thatcham and Upper Bucklebury, this document is approved and agreed with WBC and should be considered as supplementary planning consideration.</p> <p>North Wessex Downs AONB Board has objected to development on all sites that makeup Thatcham North East due to the impact on the setting of AONB and breaking the Floral Way Boundary</p> <p>I understand the need for development and the need to build more homes but I question the scale of this development in a single location, Thatcham struggles as it is and these plans will have a huge detrimental impact. I hereby would like to register my objection to these plans.</p>	<p>infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Residents would make use of the newly provided education facilities on the site.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p>
Anne Hillerton (lpr2152)	<p>I strongly object to the proposed North East Thatcham Strategic Site Allocation and the proposed development of up to 2,500 houses in NE Thatcham. As a councillor on Bucklebury Parish Council (BPC) I endorse the document submitted on their behalf in response to the consultation on the emerging draft of West Berkshire Local Plan Review to 2037, and ask that this letter is read in addition to it.</p> <p>I shall not repeat BPC's objections but shall expand on some strands.</p>	<p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states:</p>

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	<ul style="list-style-type: none"> <li>• Flawed housing demand analysis</li> </ul> <p>The current situation caused by Covid-19 was unforeseen, and I ask that it gives West Berkshire Council a reason to re-consider and to go back to government for an updated housing demand figure.</p> <p>Life has changed completely and will not return to the normal of 2019. Many businesses have learnt that having employees working mainly from home actually works better for both employer and employee from a saving on heating and rents for employer and the time and money saved by not commuting for the employee. How this plays out with Londoners wishing to relocate and M4 corridor dwellers wishing to move further out cannot as yet be determined, so I urge you to wait.</p> <p>Another effect of Covid -19 has exacerbated the trend to shop online. We have lost Debenhams and John Lewis from Newbury town centre leaving potential for more town centre flats. People will, I'm sure, continue to buy basics online so town centres will evolve. Coffee shops, restaurants and niche small shops will be what is required and the larger shops and those selling more basic goods will become available for housing development, removing the need to expand housing into farmland and encroach upon the AONB.</p> <ul style="list-style-type: none"> <li>• Strategic gap</li> </ul> <p><i>(some personal information removed)</i> [In Upper Bucklebury] there is a completely different way of life (from Thatcham). The proposed development will make Upper Bucklebury an extension of Thatcham by breaching the Floral Way northern boundary for housing that I believed and trusted. The development will erode this country life / town life difference, reducing choice and taking away the way of life in Bucklebury, one of rural West Berkshire's parishes.</p>	<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the plan being prepared prior to the coronavirus pandemic, the full impact of the COVID 19 pandemic will not be fully apparent for some time. The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years. The impact of changes in response to macro and local economic factors will be assessed through subsequent reviews, once such implications are realised.</p>

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	<ul style="list-style-type: none"> <li>• AONB and Bucklebury Common</li> </ul> <p>The rural way of life would be ruined further by the effect of a housing development of this scale so close to Bucklebury. The damage to the ecosystems and biodiversity by extra footfall, pollution, noise and light would be devastating. The damage is expanded upon in BPC's submission which I endorse fully.</p> <ul style="list-style-type: none"> <li>• Flood Risk</li> </ul> <p>Climate change has altered our seasonal patterns of weather. As I write this, much of Bucklebury Common is under water, at a level above where the new housing is planned. The extra flood risk is so grave that I cannot understand a council which produced West Berkshire SFRA proposing the housing plan THA20.</p> <ul style="list-style-type: none"> <li>• Traffic</li> </ul> <p>Upper Bucklebury suffers from excess traffic because current Thatcham residents use the narrow, winding Harts Hill and Burdens Heath as a route to the A34 / M4 west and Harts Hill and the straight road along the common, at speed, to Reading and M4 east. Speeding in the parish is a serious concern to residents now and would become even more dangerous should THA20 be allowed.</p> <ul style="list-style-type: none"> <li>• Infrastructure</li> </ul> <p>Chapel Row Surgery, situated in Bucklebury Parish, would not be able to cope with the extra number of patients. Even if a new surgery were to be built, the early residents of the proposed development would need to use existing surgeries (Chapel Row and Burdwood in Thatcham) before</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p>a new surgery would come into existence. This extra pressure on appointments etc. would be extremely detrimental to existing patients.</p> <p>For these reasons I urge you to withdraw this plan, keep Floral Way as the northern boundary, and do not build north of the A4 at Colthrop.</p>	<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from</p>

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		<p>the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Keith Watts (lpr1017)	<p>The proposed development in open countryside and adjacent to an Area of Outstanding Natural Beauty is contrary to a previous commitment that Floral Way would form the northern boundary of Thatcham. Bucklebury Parish Council has produced a well-argued document explaining the disastrous impact of the proposed development and I will not repeat it here.</p> <p>If the Council and councillors wish to maintain the trust of the people of West Berkshire then it is important that previous promises are honoured.</p> <p>The Council has already gone back on commitments it gave when the Vodafone site was developed on the Old Showground in Love Lane, Newbury that the remaining part of the old showground would never be developed. Newbury is now creeping northward towards the M4. To go back on the commitment not to build north of Floral Way will completely destroy the trust of many residents in the Council.</p> <p>In short I oppose the proposed development.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide</p>

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		details in relation to matters such as the parameters of the site, height parameters, green open space, etc.
Peter Thompson (lpr2203)	<p>I am writing to object to the proposed development of up to 2500 houses at NE Thatcham (SP 17). My main reasons are as follows:</p> <p><b><u>Removal of community boundary between Thatcham and Bucklebury</u></b></p> <p>The land north of Floral Way currently provides a strategic gap between Thatcham and Bucklebury. This proposal undermines the planning principle of maintaining a strategic gap to separate communities by virtually eliminating it and would visually and socially break the natural community boundaries.</p> <p><b><u>Traffic</u></b></p> <p>A development of the scale proposed would lead to a significant increase in traffic, which has not been adequately considered in the proposals. There is an assumption that the bulk of traffic would use the A4, accessed via Floral Way; the A4 is already commonly overloaded at peak times, causing significant congestion which is harmful on the environment, and new residents would look to other routes. These routes would likely be through the Parish villages, particularly for access to the A34 and M4, on rural single-carriageway roads with blind corners and many without footpaths, therefore ill-suited to coping with the additional volume of traffic:</p> <ul style="list-style-type: none"> <li>• The increased traffic will negatively impact many surrounding villages including Upper Bucklebury, Cold Ash, Burdens Heath, Chapel Row and Bradfield</li> <li>• The current roads will not be sufficient to support this increased level of traffic</li> </ul>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation</p>

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	<ul style="list-style-type: none"> <li>• These roads already suffer with concerning levels of speeding (recent Parish Council SIPS deployment has confirmed this and the police have the figures) and the proposal would exacerbate this issue further</li> <li>• The increased traffic will be a safety concern for local residents, particularly children whilst walking to and from school</li> <li>• The houses located on Harts Hill Road and Burdens Heath in Upper Bucklebury, and The Ridge in Cold Ash, do not have a footpath outside. Increased traffic along these roads will make it significantly more dangerous for pedestrians in these areas in particular</li> <li>• The increased volume of traffic will impact the quality of life for the residents of the villages mentioned through increase traffic noise and disturbance</li> </ul> <p><b><u>Inadequate Supporting Infrastructure for Scale of Development</u></b></p> <p>A development of the scale proposed would have significant knock-on impacts to local infrastructure, a number of which have not been adequately considered.</p> <ul style="list-style-type: none"> <li>• The proposal does not consider the increase in healthcare services required to support +25% housing increase in the Thatcham area</li> <li>• The proposal does not consider the strain of a likely increased demand on Thatcham Train Station. Parking facilities at Thatcham Train Station are already insufficient to cope with current demand and there would need to be a significant increase in the provision of parking at the station to cope with increased demand</li> <li>• The road infrastructure in a number of common commuting directions from the development are not sufficient, in particular</li> </ul>	<p>packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide</p>



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	<p>the significant bottlenecks already experienced at the rail level crossing when travelling south</p> <p><b><u>ANOB</u></b></p> <p>The proposed development is adjoining the Bucklebury Common and ANOB and it would have a long-lasting negative impact on this special environment. There would also be a significant detriment in the loss of the open aspect of the local neighbourhood and loss of the existing countryside/rural views. The close proximity of the development to the Bucklebury Common and ANOB will have an impact directly and indirectly through the likely increase in visitors:</p> <ul style="list-style-type: none"> <li>• The Common is protected because of its flora, fauna and situation and its special habitats are home to rare and protected wildlife. There is no doubt that such a close, high-density development, will have a negative impact on this area and wildlife</li> <li>• The plants in and bounding the ANOB would suffer and the Common would be put under pressure from additional visitors</li> <li>• The ANOB is already suffering habitat damage from walkers, cyclists and motorised vehicles and the additional visitor numbers would exacerbate damage to this struggling environment</li> <li>• The area already suffers from significant waste issues, that needs the support of local village volunteers to regularly undertake rubbish clearing days to keep under control</li> </ul> <p><b><u>Pollution</u></b></p> <p>The proposed development would generate pollution in the form of extraneous light which would drive local wildlife out of their existing habitats. It would also affect local Bucklebury residents by spoiling their night sky. Furthermore, the scale of the proposed development would</p>	<p>details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

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	lead to increased pollution from carbon emissions and those associated with increased population density.	
CPRE Berkshire (lpr1701)	<p>A main feature is allocating a large strategic development area NE of Thatcham, for which an extensive masterplan study was commissioned by WBC.</p> <p>A part of this area at Siege Cross has been considered before but dismissed on appeal but now some 700 acres in two main parts is proposed, for 1250 dwellings to 2037 but to 2500 longer term. We are concerned that the area stretches too far up the hillsides northwards and is unacceptable in landscape terms and in relation to the surrounding AONB. We note, p31 2.47 of the study acknowledges the objection by the NWD AONB office to the proposal in general. The masterplan introduction mentions the valley floor as most suitable for development and it should be limited to this. If not there will be major problems, apart from that just mentioned. The steeply rising land and gully's will give rise to major flooding below, which Thatcham is well experienced of: SuDS drainage schemes would need to be extensive and would considerably alter the landscape. Housing will be very visible from hills to the south. The traffic problems around Thatcham have been well described by others, whom we support.</p> <p>Overall, we recommend that the western area around Harts Hill of high ground should be removed from this proposal. To the east, the landscape surroundings of the Crematorium should be retained.</p> <p>A country park is mentioned, but our strong recommendation is that a wide woodland belt be established across the higher ground, consisting of deciduous and pine trees, Hazel coppices and native bushes, with glades and rides planted that will gradually establish a fine biodiverse habitat.</p>	<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and</p>

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		Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.
RGW Harris (lpr2204)	<p>I am writing to strongly object to the proposed development above and wholeheartedly endorse the objections by Bucklebury Parish Council and those by Thatcham Town Council.</p> <p>This development is primarily outside the existing planning boundaries and will dramatically encroach upon the separation of Thatcham and Bucklebury as well as reducing the present open lands (“green lungs”) which contain bounteous flora and fauna. In a recently published paper by Cambridge Professor Sir Partha Dasgupta (see “a”) clearly recommends that we should take into consideration the environment and its interaction with modern development and commerce. I can see no account of any real effort to allay any possible destruction of habitat and green space. Green space provides us with clean oxygen and a visual break from buildings and helps to reduce stress.</p> <p>It is also seen that pollution dramatically affects birdsong see (“b”) as well as removal of their habitat. We have lost a lot of smaller garden birds in Thatcham due to the massive influx of seagulls and red kites, beautiful as they are, they are not native to a country town, more pollution and encouragement from more people will exacerbate the problem.</p> <p>These houses are not needed in Thatcham there is no evidence that we need such a large amount and all the evidence provided so far is based on pre pandemic times which were dramatically different from today and</p>	As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR).The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different

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	<p>most likely in the future. We do not know what will be needed then so we should wait and see what transpires before leaping off into the unknown and building such large numbers.</p> <p>I have no objection to smaller developments taking place in vacant areas providing the infrastructure is adaptable, but that is unlikely in much of Thatcham. (Maybe up to 70-100 houses)</p> <p>One of my biggest concerns is the issue of flood waters. We were flooded out in 2007 just weeks after we moved in and are not living in a flood risk area, but the waters came down from The escarpment of the North Wessex Downs, this development will impede the natural flow and all the effort that has gone into the existing flood defence works to provide (so far) protection could be reduced. I know that provision is being made but where will it go to? It could well flow around either side and we get flooded again when not on a flood plain. The effects of the flood then were devastating to wildlife as well.</p> <p>The Discovery centre was underfoot yet the Lower Way development is apparently still on the cards; another “green lung” being removed. I travelled on that day (20/07/2007) up to Southend Bradfield and the roads along the Avenue were underwater, and that is at the top of the hill, so I know how devastating this volume of water can be sand any impediment to it may create potential devastating flooding again.</p> <p>I cannot comprehend why so many developments are taking place near main roads, which produce pollution and the traffic from these developments will only increase that dramatically. This is simply because Thatcham has an extremely poor road system, there is no effective bypass, north to south is impossible because of the rail crossing (lack thereof) and I have not seen any evidence of the developers building new by passes and bridges over the Kennet and Avon and rail line. As the roads get more congested there will be more pollution. It can take 15 minutes and more to use the A4 through</p>	<p>parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p>

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	<p>Thatcham because of volume and poor traffic light sequencing today, goodness knows what effect this development will have. I have not seen mentioned but it is impossible to read everything in the severely limited time we have, that all these households will be receiving more home deliveries and deliveries in general so that could be thousands of extra traffic movements in addition to the incumbents of the development.</p> <p>The lack of access to the station by car and public transport almost renders the use of railway impossible therefore more cars will be used. “15-minute walk to the Railway Station” has been quoted, that is quite a fast walk and when it is inclement weather, we must be realistic, cars will be used, there is no evidence of many more cycles being used in spite of the massive expenditure on “cycle lanes”, people will take the line of least resistance and get in a car.</p> <p>If they go towards Newbury the A4 and Floral Way will become saturated, with more pollution which is madness. If travelling eastwards the villages of Woolhampton will be adversely affected and Bucklebury, Chapel Row Southend Bradfield will become so called “Rat Runs”. The Harts Hill road is already a dangerous road and does not need any more traffic. All the village roads are narrow carriageways with pedestrians. Having lived up in Chapel Row before speeding traffic is a real menace to all.</p> <p>One of the main “bones of Contention” in Thatcham for decades has been the wholly inadequate water treatment works we are constantly bombarded by malodorous and unhealthy odours. This can only seriously affect that. No mention of that as far as can be seen, but not having had any real chance to read the hundreds of pages, no formal notification to Thatcham and Bucklebury residents is quite shameful.</p> <p>The size of this development overall of 2500 dwellings is equivalent to a new village in its own right and similar to Bucklebury and Cold Ash,</p>	<p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and</p>

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	<p>villages each now. In a location that overlooks a main road (in one part) were there is already pollution and also a large industrial estate. It will despoil existing views of the countryside which will adversely affect local mental health. At a time when it looks like we will need to create more space the intention of these proposals is to reduce what we already have, which will be to the eternal detriment to our children, flora and fauna.</p> <p>On this basis I very strongly object to these proposals and to the fact that public money is being used in the fight for and against.</p> <p>a/Independent report Interim Report – <u>The Dasgupta Review</u>: Independent Review on the Economics of Biodiversity Interim Report of the independent Review on the Economics of Biodiversity led by Professor Sir Partha Dasgupta</p> <p>b <u>Noise and Light Pollution Impact Songbird Reproduction</u></p> <p>It is also seen that pollution dramatically affects birdsong as well as removal of their habitat. We have lost a lot of smaller garden birds in Thatcham due to the massive influx of seagulls and red kites, beautiful as they are they are not native to a country town.</p>	<p>Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In regards to water supply, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p> <p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p>
Chad Williams (lpr936)	<p>I <b>oppose</b> the proposed development of up to 2,500 houses at North East Thatcham based on the following grounds:</p> <ul style="list-style-type: none"> <li>- proximity to and impact on North Wessex Downs AONB</li> <li>- increased traffic around Thatcham (Floral Way / A4) and the resultant increased traffic on ill-suited rural routes (e.g. through Parish of Bucklebury)</li> <li>- increased strain on public infrastructure - medical, dental, education, transport, sports facilities</li> </ul>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p>

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		<p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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		<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Leo Hartley Russell (lpr2202)	<p>I am writing to you to strongly object to this ridiculous development plan.</p> <p>My primary reason is for the environmental impact it will have and believe houses should not be built so condensely in such a short amount of time, especially in an area which could not manage the large increase in footfall and traffic.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>
William Slatford (lpr2214)	<p>I am a resident of Upper Bucklebury, and I wish to raise my objections to the proposed development at north east Thatcham.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment</p>



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	<p>Please consider the following questions and points regarding the proposal:</p> <p><b><u>North Wessex Downs AONB</u></b></p> <p>The proposed development will have a significant detrimental effect on both the countryside and the North Wessex AONB. The natural beauty of the area will be irretrievably lost if the development goes ahead. There will be also significant light pollution into the AONB.</p> <p>Policy DC1 of the draft local review states: “Planning permission will not be granted ... where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB ...” Policy SP1 makes clear the conservation and enhancement of the North Wessex Downs AONB and its setting is a key consideration.</p> <p><b><u>Strategic Gap between Thatcham and Bucklebury</u></b></p> <p>The land north of Floral Way has provided the gap between Thatcham and Bucklebury, and breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past.</p> <p>WBC policies require the maintenance of settlements as separate entities. The proposal would remove much of the strategic gap between Bucklebury and Thatcham - urbanising the village and the edge of the AONB. WBC already acknowledges this loss of separate identities in the Site Selection Background Paper.</p> <p><b><u>Highways</u></b></p> <p>The effect on local roads would be catastrophic. Roads around Thatcham are often log jammed, and the introduction of 2500 houses worth of cars will cause the area to grind to a halt. The strategic road</p>	<p>(LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period.</p>

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	<p>network would be unable to cope, and traffic would spill over onto rural roads. Rat running through Bucklebury is already prevalent; it would become overwhelming. Rural roads often have no footpaths, are unlit and have sharp bends - completely unsuitable for the inevitable volume of traffic.</p> <p>The station and town centre are too far from the development, so people will continue to use their cars, further clogging Thatcham roads, increasing parking requirements, and doing little to help WBC achieve its Carbon Neutrality targets.</p> <p>WBC will need to ensure" that development proposals will not result in an unacceptable impact for any user of both the local and strategic road networks."</p> <p><b><u>Surface Water Flood Risk</u></b></p> <p>Thatcham is already at risk from flooding due to surface water runoff. Why build 2500 houses in an area that would exacerbate the problem, when other choices are available? The NPPF directs development away from areas that are prone to flooding.</p> <p><b><u>Conservation</u></b></p> <p>The proposal would do significant and irreparable damage to the biodiversity and fragile ecosystems of Bucklebury Common and surrounding areas, including a number of protected species. The proposal fails to meet a WBC core objective of protecting and enhancing existing landscape features and biodiversity habitats.</p> <p><b><u>Climate Change</u></b></p> <p>It is difficult to see how the proposal at THA20 would deliver on WBC's requirement for a minimum provision of 20% energy from onsite</p>	<p>Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will</p>

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	<p>renewable sources. Renewable sources would have to cause no harm to residents and to the wider area, especially so close to the AONB.</p> <p><b><u>Siege Cross</u></b></p> <p>WBC has already rejected a planning application for one of the proposed sites. It makes little sense that a site that was unsuitable because of its adverse effect on the local area, is now considered to be suitable, despite being five times larger.</p> <p>I would like to reiterate my objections to the proposal at Thatcham North East as part of the review of WBC's Local Plan.</p>	<p>be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire's declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p>

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		<p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thatcham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thatcham for housing.</p>
Tim Slatford (lpr2138)	<i>(personal information removed)</i> I wish to raise my objections to the proposed development at north east Thatcham, which is contained within Policy SP17 of the Local Plan Review (LPR). I would contend that Policy SP17 is fatally flawed from conception; that it should be	In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government’s standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).

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	<p>removed from the proposed LPR, and the associated housing allocation in SP13 reconsidered.</p> <p>There are obviously significant limitations on development within West Berkshire; do WBC contend the requirement to use the standard approach under NPPF paragraph 60 for assessing local housing need in attempt to reduce that burden?</p> <p>WBC’s plans were obviously thrown into disarray with the non-availability of the proposed Grazeley site; the resulting process appears to the layman that THA20 is the quick answer to the housing requirement, now make the evidence fit.</p> <p>Please consider the following questions and points regarding the proposal:</p> <p style="padding-left: 40px;">1. <b><u>Site Selection Background Paper (SSBP)</u></b></p> <p>Within the site selection process, it is noteworthy that the diametric change in attitude towards Thatcham that has occurred in the current Plan period. Within the Site Selection Background Paper (SSBP) Table 2 THA 9 “The Core Strategy was clear that Thatcham was to receive a lower allocation than other Urban Areas given the rapid expansion that had taken place in the town over recent years. This was to allow a period of consolidation, ensuring the infrastructure and town centre facilities could be upgraded to meet the demands of the existing population.” Was this assessment completely wrong, because suddenly there is a requirement for 2500 houses in Thatcham? Masterplanning only the Thatcham area then meant the selection of THA20 almost inevitable as the only available site of a size suitable to deal with the Grazeley shortfall.</p> <p>Again to the layman, there appears to be different criteria applied to make THA20 evidence fit. There are numerous examples within the</p>	<p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p> <p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>The aim of the site selection paper is to pull together into a single document, key conclusions arising from the following strands of evidence and appraisals: Housing and Economic Land Availability Assessment; Settlement Hierarchy Review Background Paper; Settlement boundaries; Designated</p>

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	<p>SSBP where sites are “not recommended for allocation” because of traffic, AONB, environmental, and flooding reasons:</p> <p>CA12 “... ensure that development is planned in a way that ensures the protection and enhancement of the local distinctive character and identity of the built, historic and natural environment across the District.”</p> <p>8.5. CA15 “...to be acceptable in highways terms, a through route from the B4000 to the A339 is needed.”</p> <p>SCD4 “Issues which would need to be resolved relate particularly to highways and access and further information would be required on ecology, heritage and landscape...Development would require access from the B4009 to the A339.”</p> <p>8.22. “...adjacent, or within the AONB. Run off ... can have an impact on surface water flooding in Thatcham and any development would need to take account of this risk.</p> <p>8.54. “...important environmental assets within Woolhampton... areas of ancient woodland to the north and west ...”</p> <p>8.94. “...although close to the A34 and M4, local roads are rural in nature and not suitable for heavy traffic.”</p> <p>Table 8.9 “Traffic related concerns are perhaps the biggest single issue for the local community ... A more intensive development in this location would be out of character with the existing settlement form.”</p> <p>As each of these points relate to smaller developments, it is not unreasonable to assume that give the proposed size of THA20, the size of the response and consideration within them would be proportionately larger. Instead the report on THA20 simply states: “In contrast there are very few negative impacts that developing the site would have.” It does acknowledge that some further investigation is required, but the</p>	<p>Neighbourhood Areas; Employment Land Review; Level 1 Strategic Flood Risk Assessment; Sustainability Appraisal / Strategic Environmental Assessment; and Detailed site assessments. It balances the key findings to determine which sites should be included as allocations in the emerging draft LPR. The assessments are undertaken in a consistent manner and is a policy off assessment. The LPR sets the policy context for allocation of sites through the settlement hierarchy set out in SP1.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p>apparent difference in the level of consideration between THA20 and other sites is astounding.</p> <p>THA20 would have disproportionately larger adverse effects than the sites discounted above, but these appear to have just been glossed over. SSBP Table 8.2. Site THA9. “There are concerns that development may reduce the open countryside between Thatcham and Newbury / Greenham, and introduce built form to south of Lower Way. The site is a buffer to development and forms part of the open character along this side of Lower Way. There is further concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape.”</p> <p>It is strange that similar comments were not written relating to THA20 in the context of Thatcham/ Upper Bucklebury, built form to the north of Floral Way, the site being a buffer to development, and development being inappropriate to settlement form and landscape character. These comment areas were considered noteworthy for a 36 house development, but were not mentioned for a 2500 house one.</p> <p>Table 8.2 CA12 states: “It is the Council’s preferred approach to allocate site THA20...” but gives no firm evidence as to why. Evidence for multiple other sites down plays their suitability, in comparison to THA20, where damning evidence is instead down played. I am sure WBC are cognisant of SSBP 2.2. “... One of the tests of soundness for Local Plans as set out in paragraph 35 of the NPPF ...the assessment of sites and how they compare against one another will be important to demonstrate reasonable alternatives have been considered.”</p> <p><b>2. <u>North Wessex Downs AONB</u></b></p> <p>The National Planning Policy Framework is clear that great weight should be given to conserving landscape and scenic beauty in AONBs, and WBC has a stated strategic objective to conserve and enhance the</p>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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	<p>AONB, to reflect that. There are numerous references to the AONB within the LPR and SSBP, and sites being unsuitable because of their proximity to the AONB. However, all requirements appear to have been forgotten when referring to THA20.</p> <p>SP2 states “Development will respond positively to the local context, conserving and enhancing local distinctiveness, sense of place and setting of the AONB. The strong sense of remoteness, tranquillity and dark night skies. Should be preserved. The conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of all development proposals.” Whilst the development is not within the AONB, the sentiment is still valid “Planning permission will be refused for major development ...by reason of its scale, character or nature ... potential to have a significant adverse impact on the landscape and scenic beauty of the AONB...the impact of cumulative development.”</p> <p>The requirement to protect the AONB is carried through many other policies, and the requirement to protect the AONB setting. Policy DC1 states: “Planning permission will not be granted ... where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB ...” Policy SP1 makes clear the conservation and enhancement of the North Wessex Downs AONB and its setting is clearly a key consideration.</p> <p>WBC’s own Landscape Sensitivity Study on Thatcham states that “LLCA13D: Hart’s Hill Plateau Woodlands has strong landscape links with the wider AONB landscape to the north...” and LLCA14F: Colthrop Manor Plateau Edge ...The area is highly visible from the Kennet Valley and the Greenham escarpment ...provides a strong contrast to the urban form of Thatcham town ...It forms an important setting to</p>	<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p>



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	<p>Thatcham and rural transition zone between the urban area and the AONB.”</p> <p>It should be obvious that 2500 houses literally on the doorstep of the AONB will have a huge detrimental effect on the landscape, light pollution, and fragile ecosystems that WBC are charged to protect. The Thatcham Strategic Growth Study (TSGS) offers little assessment of the damage THA20 would cause, and the SSBP section on THA20 makes no mention of the AONB.</p> <p>WBC is well aware of the negative impact on the AONB and the local countryside. SSBP Table 8.2. Site CA12 (pg21) (and later CA sites) states “...development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.”</p> <p>This clearly states that by developing THA20 WBC is accepting that the separate identity of Bucklebury would be lost and there would be definite harm to the AONB setting.</p> <p><b>3. <u>Strategic Gap between Thatcham and Bucklebury</u></b></p> <p>Until this proposal was tabled, the land north of Floral Way has provided the gap between Thatcham and Bucklebury, and breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past.</p> <p>Policy DC1 states “...Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB”</p>	<p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the</p>

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	<p>The strategic gap between Bucklebury and Thatcham is an important one. Bucklebury is a rural parish within the AONB, whilst Thatcham is an urban town, with Floral Way the boundary between them. WBC policies require the maintenance of these as separate entities, though THA20 would destroy this feeling of separateness. The mitigations included in the TSGS are ultimately meaningless and ineffective in maintaining the gap between the settlements. As Upper Bucklebury merges into Thatcham, so too is the edge of the AONB. WBC has already acknowledged that loss in the SSBP 8.2 Site CA12 (and later CA sites.) "... development of both north east and north Thatcham would result in the loss of the separate identifies of Cold Ash and Bucklebury..."</p> <p>4. <b><u>Highways</u></b></p> <p>The impact of THA20 on the road network would be nothing short of devastating. Thatcham is already subject to lengthy delays; Floral Way and roads to the east and west are already overloaded at peak times, and the situation at the railway crossing beggar's belief. Introduce cars from 2500 houses into this equation, together with traffic for the 3 proposed schools, and the outcome is not positive. Rat running through Bucklebury parish is already common - with THA20 it would become endemic, both for traffic to the east and for the north and the A34. Highways noted these concerns in the HELAA, but they appear to have been relegated in importance in the SSBP entry for THA20!</p> <p>The traffic assessment in the TSGS is woefully inadequate. Car dependency will be high, as the train station and town centre are too far from THA20, which will bring other issues such as station parking into play. Traffic onto local roads, which are not capable of accepting increased loads, will increase dramatically.</p> <p>WBC have policies in place to prevent a development based upon adverse traffic projections based upon the required full Transport</p>	<p>improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p>

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	<p>Assessment (SP22) Equally, the LPR 12.20 requires that "...the Council would be concerned as to the effects of the proposed development on rural tracks, footpaths and bridleways. Relevant considerations would include past and existing levels of traffic generated from the site; the level, type and frequency of traffic likely to be generated by the proposed development..." All rural enterprise is expected (under DC32 viii) to "... not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal" One assumes such stringency will be applied to a proposal of 2500 houses.</p> <p>LPR 12.47 "The Council as both local planning and local highway authority will need to ensure that development proposals will not result in an unacceptable impact for any user of both the local and strategic road networks."</p> <p><b>5. <u>Surface Water Flood Risk</u></b></p> <p>The proposal fails to meet with WBC specifications regarding Flood Risk.</p> <p>Policy SP6 states that "Development within areas of flood risk from any source of flooding, including Critical Drainage Areas and areas with a history of fluvial, groundwater or surface water flooding will only be accepted if it is demonstrated that it is appropriate at that location, <b>and</b> there are no suitable and available sites at a lower flood risk.</p> <p>5.9 "This policy aims to achieve a planning solution to flood risk management wherever possible, steering vulnerable development away from areas affected by flooding."</p> <p>5.13 "The NPPF directs development away from areas that are liable to flood"</p>	

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	<p>Policy DC6 states “Development which would overload available facilities and create or exacerbate problems of flooding or pollution will not be permitted.”</p> <p>Flooding is obviously a significant risk to Thatcham. WBC’s own policies dictate that development should take place elsewhere, as there are available sites at lower flood risk. By WBCs own requirements, THA20 is an inappropriate site, as there can be little doubt that the introduction of 2,500 houses and associated infrastructure will exacerbate problems. TSGS even acknowledges these difficulties, though it is not apparent that any studies assessing THA20 in accordance with the Strategic Flood Risk Assessment (SFRA) have been completed. Any increase in flood risk to an area that is already identified as a nationally significant flood risk area is unacceptable.</p> <p>6. <b><u>Nature conservation</u></b> The proposal would do significant and irreparable damage to the biodiversity and fragile ecosystems of Bucklebury Common and surrounding areas. A number of protected species exist in the area that will either be directly or indirectly affected, either by increased footfall, light pollution, or the destruction of habitat. Quite simply, the proposal fails to meet a WBC core objective of protecting and enhancing existing landscape features and biodiversity habitats. Vast tracts of green field containing mature trees and established hedgerows would be replaced by houses, roads and some green space. Building lines would abut ancient woodland. TSGS 2.60 does state that there would be a net gain in biodiversity, which is difficult to visualise. 2.63 acknowledges the presence of protected species, priority species and priority habitat near the site, though nothing is added as to how these would be protected</p> <p>6. <b><u>Climate Change</u></b></p>	

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	<p>WBC have included Climate change as a major objective in the LPR (SP5) It is difficult to see how the proposal at THA20 would deliver on this. SP17 requires that the proposed site would deliver on-site renewal energy, and Policy DC3 3A requires a minimum provision of 20% energy from renewable sources. In accordance with Policy DC3, 3B WBC would support renewable energy applications if they are suitable for the area, are accompanied by a landscape assessment, and cause no harm to residential amenity. Whilst the concept is to be applauded, it is difficult to envisage on site power generation of the required scale that would not have an adverse effect on local amenity.</p> <p><b>8. <u>Siege Cross</u></b></p> <p>When considering the suitability of THA20, WBC should only look back to its own arguments regarding the Siege Cross development of 2015/16 (15/00296/OUTMAJ). WBC were, rightly, relentless in their arguments that development at Siege Cross would have an adverse effect on the local area. It is somewhat strange that, as Thatcham was to be left alone and now gains 2500 houses, so Siege Cross would be badly affected by 500 houses, but 2500 in the same vicinity would be beneficial.</p> <p>There are a multitude of arguments made that amplify WBC's position that Siege Cross would have an adverse effect. For example:</p> <p>WBC Statement of Case:</p> <p>1.2. 3) Landscape and Visual Impact "...The development would result in significant and demonstrable harm in terms of landscape character; settlement form; scale; identity and distinctiveness; and the historic environment. In particular:</p> <p>(c) ...result in harm to the character and identity of Thatcham and erode the open landscape between Thatcham and Upper Bucklebury.</p>	

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	<p>(d) ... adverse impact on the distinctive local landscape character and appearance of the landscape north of Thatcham, which contributes to the setting of the AONB ...</p> <p>(e)... urbanise the key areas of sensitivity within the Local Landscape Character Area 14F (Colthrop Manor Plateau Edge), including: the lower slopes of an important ridge line; Big Gully, a local landmark; good views across the area and long views across the Kennet Valley; the lack of development with scattered farmsteads and minor roads; and the rural setting of the historic settlement at Siege Cross Farm.</p> <p>(f) The development would detract from the enjoyment of the character and appearance of the AONB in views from the escarpment south of the River Kennet.</p> <p>“...the development fails to have due regard to the sensitivity of the area to change. The development is inappropriate in terms of its location over the whole site, and its scale in the context of the existing settlement form, pattern and character of Thatcham. The development also fails to conserve the historic landscape setting and rural context of Siege Cross Farm.”</p> <p>“...the application is contrary to the National Planning Policy Framework, the Planning Practice Guidance, Policies ADPP3, ADPP5, CS14 and CS19 of the West Berkshire Core Strategy (2006-2026), the relevant landscape character assessments, the North Wessex Downs AONB Management Plan (2014- 2019), and the North Wessex Downs AONB Position Statement on Setting (2012).”</p> <p>WBC Landscape Assessment Summary goes on: S.5 I set out the North Wessex Downs AONBs objections to the proposed development, which I support.</p> <p>S.7 the attributes of the site ...should be conserved and enhanced in order to maintain the local character and distinctiveness of the</p>	

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	<p>landscape and the rural setting to Thatcham and the North Wessex Downs AONB.</p> <p>S.10 The site makes an important contribution to the setting of the AONB and to the setting of both ecological and heritage designations (Long Grove Copse, Big Gully and Siege Cross Farm).</p> <p>S.11 it is a valued landscape within the meaning of NPPF 109 which should be protected and enhanced</p> <p>S.12 The proposed development on the appeal site would therefore be an extensive arm into this open elevated and prominent landscape. It is clearly not a logical extension to Thatcham as it will intrude into an overwhelmingly rural landscape, which forms an intrinsic part of the wider landscape between the AONB and Thatcham, well beyond a clearly defined and established landscape boundary to the settlement.</p> <p>S.14 The value of the landscape is enhanced by the presence of historic assets in this case two Grade II listed buildings, the historic settlement of Siege Cross Farm</p> <p>S.17 adverse effect of the development on the physical and visual setting and character of the site environment cannot overcome the impact of the location,</p> <p>On this basis I conclude that the proposed development on the appeal site would result in significant and demonstrable harm to a valued landscape and to the intrinsic beauty and character of that landscape by: Harming the setting of the North Wessex Downs Area of Outstanding Natural Beauty...”</p>	

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	<p>It would be interesting to understand why WBC thought that 500 houses would cause damage to the AONB and the local area, but it now proposes that 2500 houses in the same location would not?</p> <p>I would like to reiterate my objections to SP17, and the allocation of housing sites within SP13. The NPPF requires that “great weight must be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty” and “local wildlife-rich habitats should be protected.” THA20 would cause irretrievable damage to the local area, its wildlife, and the AONB. I would hope that WBC will listen to the concerns raised and review its proposed housing allocation sites.</p>	
Gillian Ward	<p>I am very much against the proposed plan for another 2,500 new properties in Thatcham.</p> <p>The main reasons are:</p> <ul style="list-style-type: none"> <li>• Thatcham is spreading into Upper Bucklebury (<i>personal information removed</i>) and ruining the separate identity of the villages. This is against the Bucklebury vision plan.</li> <li>• Many new homes have been already created on new estates in Thatcham over recent years (many large developments) and it has changed the nature of Thatcham to just be a huge residential sprawl which now covers a large area and requires a car to cross</li> <li>• Thatcham only has a very small town centre with a few facilities, all other residential estates just have a strip of local amenities (small shop, takeaways etc) so it already has no core or cohesive feel or identity and a large number of new properties on satellite estates would make this worse</li> <li>• There are very few jobs in Thatcham (compared to the population) so many residents have to travel to Newbury or Reading. This causes considerable congestion along the A4 and accessing the train station and causes the small countryside roads to be used as dangerous rat-runs (for</li> </ul>	<p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential</p>



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	<p>example, there have been many accidents on Harts Hill Road over recent years). This would get worse and the public transportation is not good (expensive and infrequent).</p> <ul style="list-style-type: none"> <li>• The youths and school kids do not have many suitable places to go and meet up. Although there is a skate park and some smaller parks, there is a large youth population and not much to do so they frequently just hang out around the strips of local shops. This would get worse, as there would be more youths and still little variety of things for them.</li> <li>• Thatcham has already become rather a 'dormitory town' with no soul, where people just drive back to at the end of the day to eat and sleep.</li> <li>• Where would the school boundary line be changes to?</li> </ul>	<p>delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>
Lisa Slatford (lpr2201)	<p>I wish to raise my objections to the proposed development at north east Thatcham. Please consider the following questions and points regarding the proposal:</p> <p><b><u>North Wessex Downs AONB</u></b></p> <p>The proposed development will have a significant detrimental effect on both the countryside and the North Wessex AONB. The natural beauty of the area will be irretrievably lost if the development goes ahead. There will be also significant light pollution into the AONB.</p> <p>Policy DC1 of the draft local review states: "Planning permission will not be granted ... where it does not enhance the character and distinctiveness of the rural area, including the special qualities and</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site</p>

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	<p>natural beauty of the landscape of the AONB ...” Policy SP1 makes clear the conservation and enhancement of the North Wessex Downs AONB and its setting is a key consideration.</p> <p><b><u>Strategic Gap between Thatcham and Bucklebury</u></b></p> <p>The land north of Floral Way has provided the gap between Thatcham and Bucklebury, and breach of the strategic gap has been cited by WBC to refuse planning applications in the recent past.</p> <p>WBC policies require the maintenance of settlements as separate entities. The proposal would remove much of the strategic gap between Bucklebury and Thatcham - urbanising the village and the edge of the AONB. WBC already acknowledges this loss of separate identities in the Site Selection Background Paper.</p> <p><b><u>Highways</u></b></p> <p>The effect on local roads would be catastrophic. Roads around Thatcham are often log jammed, and the introduction of 2500 houses worth of cars will cause the area to grind to a halt. The strategic road network would be unable to cope, and traffic would spill over onto rural roads. Rat running through Bucklebury is already prevalent; it would become overwhelming. Rural roads often have no footpaths, are unlit and have sharp bends - completely unsuitable for the inevitable volume of traffic.</p> <p>The station and town centre are too far from the development, so people will continue to use their cars, further clogging Thatcham roads, increasing parking requirements, and doing little to help WBC achieve its Carbon Neutrality targets.</p>	<p>which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to</p>

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	<p>WBC will need to ensure" that development proposals will not result in an unacceptable impact for any user of both the local and strategic road networks."</p> <p><b><u>Surface Water Flood Risk</u></b></p> <p>Thatcham is already at risk from flooding due to surface water runoff. Why build 2500 houses in an area that would exacerbate the problem, when other choices are available? The NPPF directs development away from areas that are prone to flooding.</p> <p><b><u>Conservation</u></b></p> <p>The proposal would do significant and irreparable damage to the biodiversity and fragile ecosystems of Bucklebury Common and surrounding areas, including a number of protected species. The proposal fails to meet a WBC core objective of protecting and enhancing existing landscape features and biodiversity habitats.</p> <p><b><u>Climate Change</u></b></p> <p>It is difficult to see how the proposal at THA20 would deliver on WBC's requirement for a minimum provision of 20% energy from onsite renewable sources. Renewable sources would have to cause no harm to residents and to the wider area, especially so close to the AONB.</p> <p><b><u>Siege Cross</u></b></p> <p>WBC has already rejected a planning application for one of the proposed sites. It makes little sense that a site that was unsuitable because of its adverse effect on the local area, is now considered to be suitable, despite being five times larger.</p> <p>I would like to reiterate my objections to the proposal at Thatcham North East as part of the review of WBC's Local Plan.</p>	<p>local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy</p>

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		<p>which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the Climate Change Emergency, The emerging draft LPR includes a policy that specifically covers climate change (policy SP5). This requires that all development should contribute to West Berkshire becoming and staying carbon neutral by 2030.</p> <p>In addition, all aspects of the local plan are targeting achieving zero carbon. For example: -</p> <ul style="list-style-type: none"> <li>• Policy SP1 (Spatial Strategy) which is the approach to where development should be located, directs development to the most sustainable locations in the district.</li> <li>• Policy SP6 (Flood Risk) directs development to areas least at risk of flood risk.</li> <li>• Policy SP22 (Transport) requires that any development that generates a transport impact will be required, amongst other things, to have regard to West Berkshire’s declared climate emergency and minimise the impact of all forms of travel on the environment.</li> <li>• Policy DC3 (Building Sustainable Homes and Businesses) looks at building sustainable homes and businesses,</li> </ul> <p>Any development site will have to comply with the aims and objectives of the plan.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and</p>

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		<p>visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that ‘in any overall review to accommodate more housing, Thattham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy’ (paragraph 67 of the Core Strategy Inspector’s Report). As additional housing is required, and given Thattham’s status as an ‘Urban Area’ in the development plan is it considered appropriate to consider Thattham for housing.</p>
Mr Simon Pike (lpr2349)	<p>While I would not use these words, the statement in paragraph 6.39 that:</p> <p>“The town’s self-image is of a large village, rather than as a thriving market town.”</p> <p>Conveys why this policy is fundamentally unsound. The development of up to 2500 houses to the north east will just make it an even more over-</p>	<p>Housing and Economic Land Availability Assessment (HELAA) submissions made in response to the Council’s initial LPR Call for Sites highlighted a number of sites being promoted in Thattham. The Council reviewed those sites and published the results; and identified that those of a strategic nature may warrant more detailed testing to better understand their suitability, capacity and viability. At Thattham, the Council identified that this could be achieved through a three-stage process through the Thattham Growth Study, with an emphasis on planning for the future of the settlement as a whole: 1. Thattham Past: Understanding historic growth and associated</p>

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	<p>sized village, and will not provide the facilities that create a thriving town.</p> <p>Paragraph 6.22 of the document states that there are ‘uncertainties’ regarding Grazeley, and therefore rules it out as a potential strategic site. There are also uncertainties regarding North East Thatcham.</p> <p>Paragraph 6.36 states:</p> <p>“...in recent decades, the provision of social infrastructure has not kept pace with housing growth”.</p> <p>And paragraph 6.37 states:</p> <p>“The vision for Thatcham contained in the Core Strategy DPD (2012) was that Thatcham town centre would be a focus for regeneration, enabling the town to fulfil its role within the District’s Hierarchy of Centres by improving the retail offer and enhancing the streetscape. The provision of leisure and community facilities for all ages would be improved and encouraged within the town centre.”</p> <p>However, this regeneration has not happened, and additional housing will compound the deficit in facilities and infrastructure that already exists. There is nothing in policy SP 17 to explain how the infrastructure needed for Thatcham as a whole will be delivered, and the Thatcham Strategic Growth Study also does not address this.</p> <p>The status of the Thatcham Strategic Growth Study within the plan is very unclear. It presumably does not form part of the formal Local Plan unless explicitly referenced. The statement in policy SP 17 that:</p>	<p>infrastructure/service provision to identify any under or over provision by current day standards; 2. Thatcham Present: To consider the potential to deliver strategic scale growth, from the point of view of the known physical and environmental constraints of the town and the land being promoted, having regard to the need to deliver measures to mitigate the impact of growth or capitalise on its opportunities; and 3. Thatcham Future: To test in more detail those areas with the potential to accommodate in the order of 3,500 dwellings and associated needs, to confirm their suitability, capacity and viability, so as to include the Growth Study in the Local Plan Review Evidence Base. This figure is notional and was provided by the Council for the purposes of testing, and does not pre-judge what is or should be delivered in Thatcham.</p> <p>The status of the Thatcham Strategic Growth Study is that it forms part of the evidence behind the LPR and does not form part of policy. The policy for the allocation is SP17 contained within the LPR.</p>

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	<p>“The Council will be supportive of proposals which have regard, and positively respond, to the masterplanning work contained in the Thatcham Strategy Growth Study (2020).”</p> <p>Is extremely vague. Which elements contained in the Growth Study does the Council believe are important or essential? How would the Council ‘respond’ to proposals that do not have sufficient regard to the Growth Study? This wording seems give licence to developers to ignore any elements of the Growth Study and masterplan that they find inconvenient.</p>	
Alison Messon (lpr2199)	<p>I would like to lodge my strenuous objections to this proposal on a number of grounds</p> <p>The sheer scale of the proposed development is out of keeping with the local area and will take away much of what we value. West Berkshire is known for its green spaces and assortment of characterful villages and towns. This development will decimate the environment, add enormous burden to the local infra structure and will become yet another soulless mass of houses. I have observed similar developments in Chippenham and Trowbridge; they have not enhanced the local area in any way - they have introduced a massive drain on local facilities and remain separate from the local towns. Kennet Heath has just 800 homes and yet already feels separate from Thatcham - the proposed development is 4 times the size.</p> <p>The local traffic challenges with the railway crossing at Thatcham are already considerable, with delays often of 20 mins sometimes 40 mins. The additional traffic this development will cause will compound the situation further. The location means that new residents will be forced to get in their cars to access basic amenities.</p>	<p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there</p>

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	<p>I would urge that this proposal is rejected and alternatives with much smaller scale housing developments are considered.</p> <p>I would be happy to write in more detail - but I only discovered these plans in the last couple of days and am horrified by the lack of time to respond appropriately</p>	<p>would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Christine Harris (lpr2211)	<p>I am writing to strongly object to the proposed development above and wholeheartedly endorse the objections by Bucklebury Parish Council and those by Thatcham Town Council.</p> <p>This development is primarily outside the existing planning boundaries and will dramatically encroach upon the separation of Thatcham and Bucklebury as well as reducing the present open lands (“green lungs”) which contain bounteous flora and fauna. In a recently published paper by Cambridge Professor Sir Partha Dasgupta (see “a”) clearly recommends that we should take into consideration the environment and its interaction with modern development and commerce. I can see no account of any real effort to allay any possible destruction of habitat</p>	<p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review (SBR). The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process. North East Thatcham is proposed for allocation under policy SP17. Should the site, or any part of it, be removed from the LPR the boundary for Thatcham would be adjusted to exclude it. It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’ The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and</p>



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	<p>and green space. Green space provides us with clean oxygen and a visual break from buildings and helps to reduce stress.</p> <p>It is also seen that pollution dramatically affects birdsong see (“b”) as well as removal of their habitat. We have lost a lot of smaller garden birds in Thatcham due to the massive influx of seagulls and red kites, beautiful as they are, they are not native to a country town, more pollution and encouragement from more people will exacerbate the problem.</p> <p>These houses are not needed in Thatcham there is no evidence that we need such a large amount and all the evidence provided so far is based on pre pandemic times which were dramatically different from today and most likely in the future. We do not know what will be needed then so we should wait and see what transpires before leaping off into the unknown and building such large numbers.</p> <p>I have no objection to smaller developments taking place in vacant areas providing the infrastructure is adaptable, but that is unlikely in much of Thatcham. (Maybe up to 70-100 houses)</p> <p>One of my biggest concerns is the issue of flood waters. We were flooded out in 2007 just weeks after we moved in and are not living in a flood risk area, but the waters came down from The escarpment of the North Wessex Downs, this development will impede the natural flow and all the effort that has gone into the existing flood defence works to provide (so far) protection could be reduced. I know that provision is being made but where will it go to? It could well flow around either side and we get flooded again when not on a flood plain. The effects of the flood then were devastating to wildlife as well.</p> <p>The Discovery centre was underfoot yet the Lower Way development is apparently still on the cards; another “green lung” being removed. I travelled on that day (20/07/2007) up to Southend Bradfield and the</p>	<p>Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p>

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	<p>roads along the Avenue were underwater, and that is at the top of the hill, so I know how devastating this volume of water can be sand any impediment to it may create potential devastating flooding again.</p> <p>I cannot comprehend why so many developments are taking place near main roads, which produce pollution and the traffic from these developments will only increase that dramatically. This is simply because Thatcham has an extremely poor road system, there is no effective bypass, north to south is impossible because of the rail crossing (lack thereof) and I have not seen any evidence of the developers building new by passes and bridges over the Kennet and Avon and rail line. As the roads get more congested there will be more pollution. It can take 15 minutes and more to use the A4 through Thatcham because of volume and poor traffic light sequencing today, goodness knows what effect this development will have. I have not seen mentioned but it is impossible to read everything in the severely limited time we have, that all these households will be receiving more home deliveries and deliveries in general so that could be thousands of extra traffic movements in addition to the incumbents of the development.</p> <p>The lack of access to the station by car and public transport almost renders the use of railway impossible therefore more cars will be used. "15-minute walk to the Railway Station" has been quoted, that is quite a fast walk and when it is inclement weather, we must be realistic, cars will be used, there is no evidence of many more cycles being used in spite of the massive expenditure on "cycle lanes", people will take the line of least resistance and get in a car.</p> <p>If they go towards Newbury the A4 and Floral Way will become saturated, with more pollution which is madness. If travelling eastwards the villages of Woolhampton will be adversely affected and Bucklebury, Chapel Row Southend Bradfield will become so called "Rat Runs". The Harts Hill road is already a dangerous road and does not need any more traffic. All the village roads are narrow carriageways with</p>	<p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to waste water capacity, the developers are aware of the requirement for upgrades to the water supply network and water treatment works (which is identified in the Water Cycle Study).</p>

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	<p>pedestrians. Having lived up in Chapel Row before speeding traffic is a real menace to all.</p> <p>One of the main “bones of Contention” in Thatcham for decades has been the wholly inadequate water treatment works we are constantly bombarded by malodorous and unhealthy odours. This can only seriously affect that. No mention of that as far as can be seen, but not having had any real chance to read the hundreds of pages, no formal notification to Thatcham and Bucklebury residents is quite shameful.</p> <p>The size of this development overall of 2500 dwellings is equivalent to a new village in its own right and similar to Bucklebury and Cold Ash, villages each now. In a location that overlooks a main road (in one part) were there is already pollution and also a large industrial estate. It will despoil existing views of the countryside which will adversely affect local mental health. At a time when it looks like we will need to create more space the intention of these proposals is to reduce what we already have, which will be to the eternal detriment to our children, flora and fauna.</p> <p>On this basis I very strongly object to these proposals and to the fact that public money is being used in the fight for and against.</p> <p>Note:</p> <p>a/Independent report Interim Report – <u>The Dasgupta Review</u>: Independent Review on the Economics of Biodiversity Interim Report of the independent Review on the Economics of Biodiversity led by Professor Sir Partha Dasgupta</p> <p>b/Noise and Light Pollution Impact Songbird Reproduction</p>	<p>Should the development go ahead, it would be phased appropriately to ensure it does not outpace delivery of essential network and treatment upgrades (See IDP).</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an integrated water supply and drainage strategy which will consider existing related infrastructure on the site.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it does not assess the capacity of individual components of the site in relation to individual planning proposals. The LCA will be published as part of the council’s evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site. With any application that would come forward on this site, the developers would be expected to submit a ‘masterplan’ / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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	<p><a href="https://news.ncsu.edu/2020/11/noise-and-light-pollution-impact-songbird-reproduction/">https://news.ncsu.edu/2020/11/noise-and-light-pollution-impact-songbird-reproduction/</a></p> <p>It is also seen that pollution dramatically affects birdsong as well as removal of their habitat. We have lost a lot of smaller garden birds in Thatcham due to the massive influx of seagulls and red kites, beautiful as they are they are not native to a country town.</p>	
Alison Smith (lpr2206)	<p>As an Upper Bucklebury resident, I have huge concern over the planned expansion of Thatcham. After all the floods and chaos caused I can't believe this is even being discussed in an area of outstanding infrastructure with no decent access other than a very very already busy a road. I object on the following grounds,</p> <ul style="list-style-type: none"> <li>• Loss of greenbelt land and historic countryside</li> <li>• Loss of habitat and conservation land</li> <li>• Loss of ecology</li> <li>• Over expansion of Thatcham</li> <li>• Inappropriate site for development</li> <li>• Lack of proposed infrastructure to facilitate this development</li> <li>• Increase in traffic and pollution on already busy roads</li> <li>• Concern over flood and land drainage risk to existing properties in Thatcham</li> <li>• There are better sites available within West Berkshire to facilitate housing development, that will have far less impact on local people</li> </ul> <p>I genuinely hope you reconsider before you even get to planning as it is sickening really. You have a huge sandleford opportunity to get on with and would very much appreciate if you left our beautiful green spaces alone.</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to</p>

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		<p>accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to</p>

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		<p>local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p>
Eric Lloyd (lpr2197)	As a resident of Upper Bucklebury, I find it incomprehensible that a proposal such as above can be seriously considered so as to dump such a large provision of housing on this in-appropriate green-belt location with the consequential and obvious adverse effect that it will	The site is not within the Green Belt (there is no Green Belt in this District).

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	<p>have not only on the residents of Thatcham itself but also on neighbouring villages in the wider surrounding rural area - an Area of Outstanding Natural Beauty.</p> <p>Over the years, Thatcham has suffered an ongoing and exponential expansion in housing development such that it is rapidly becoming an indistinct suburb of Greater Reading with individual villages vanishing in a stream of continuous ribbon development. When the Dunston Park and Thatcham Relief Road (Floral Way) developments were granted planning consent, it was understood at the time that this road would become the boundary for any future Green Belt development northwards but this understanding (or legal planning requirement?) seems to have 'bit the dust'.</p> <p>Apart from this, Thatcham and its surrounding areas are unable to take any further such sized development in the context of its existing infrastructure and amenities.</p> <p>Traffic build up and lack of parking facilities within the town centre are a major problem as existing, without the addition of some likely 3,500 additional vehicles from the proposed development.</p> <p>Waitrose carpark is currently, in normal times, virtually full all day.</p> <p>The Station carpark for Commuters is usually full in normal times and would be unable to cope with any additional demand.</p> <p>The build-up of traffic at the Level Crossing (Bridge proposal seemingly now abandoned), which gets worse and worse, is currently unacceptable. With further trains and further traffic build up, it will make it virtually impossible to cross from the north to the south side of the railway lines on what is a crucial route (despite what Town Planner David Lock says) in normal times. All this is in addition to the adverse</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20</p>

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	<p>impact that the additional traffic generated from the proposal will have on wider local villages and country lanes.</p> <p>For these reasons, please register my personal objections to the above Proposal.</p>	<p>development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p>
Mr and Mrs Simpson (lpr1914)	<p>It is with serious concern that we as residents of Thatcham and possibly nearest to any part of the developed area, wish to appeal to you to reconsider any such proposal for the following reasons:</p> <ul style="list-style-type: none"> <li>- not following your own guidance by developing on green field sites</li> <li>- causing lasting damage to the wildlife habitats</li> <li>- over development on the Eastern fringe of the Thatcham parish boundary</li> <li>- further erosion of the Thatcham/Bucklebury green belt</li> <li>- increasing volume of traffic from the developments onto all existing roads</li> <li>- insufficient infrastructure in place for the current housing</li> <li>- further increase in already unacceptable noise levels heard as far away as Upper Bucklebury constantly day and night</li> </ul>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected</p>



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		<p>to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council’s website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Thatcham is an ‘Urban Area’ as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector’s report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p>

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		<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with</p>

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		<p>infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Mr and Mrs Evans (lpr2092)	<p>We write to add our objection to the building of 2500 new houses along Floral Way, Thatcham.</p> <p>We have read that a new railway bridge at Thatcham is not being considered as it would encourage this route to become a rat run. However, we strongly believe that instead the hundreds of extra cars will use Hart's Hill Road, Broad Lane through to Cold Ash and along down Red Shute Hill towards Hermitage to join the M4 or A34 as an alternative 'rat run'. These roads are totally unsuitable for any increased traffic, they are already in a poor, unmaintained state of repair and in addition pedestrians (including school children) and cyclists use these roads, without footpaths. To increase traffic would endanger lives. Something that WBDC would be culpable for if even one life was lost due to this development.</p> <p>As it stands neither Thatcham not Bucklebury has the infrastructure, nor amenities to be able to support such a development. Normally on sites of this size any schools or other facilities offered are the last to be added, if at all.</p>	<p>Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed</p>

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	<p>It was decided many years ago that Thatcham was not a suitable route for the new A34 and it was instead built to support Newbury. Therefore all new large developments should instead be located within it's environ to alleviate pressure on our already congested local routes.</p> <p>We hope that there have been enough objections for you to reconsider and ditch this plan.</p>	<p>by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
The Bucklebury Practice (lpr2313)	<p>We refer to the West Berkshire Local Plan 2037, which we acknowledge includes the building of new homes in the West Berkshire area, we are concerned about the significant impact extra homes will have on the health and wellbeing provision locally.</p> <p>Our GP Practice currently serves over 8,300 patients, which is almost 2,000 more patients than the practice was originally designed to accommodate and an additional 2,500 houses in our local area, could add a further 5,000 + patients to our practice.</p> <p>Maintaining a high quality healthcare service to our patients is a top priority for our practice and therefore we would request that our Doctors and our local colleague Doctors are involved with the council's Local</p>	<p>Comments noted, and the Council acknowledge and welcome joint working and collaboration with service providers such as the doctor's surgery.</p>

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	<p>Plan 2037 and the effects this will have on our local facilities and services and in particular healthcare services.</p> <p>We would like our concerns and request to be involved, noted by West Berkshire Council and we would request an open dialogue with the local GP Practices, including Chapel Row Surgery who will be particularly affected by the additional housing being considered, at the earliest point in the progress, and throughout the development, of the Local Plan 2037, to ensure all aspects of the development are carefully considered and adequate planning is undertaken regarding the local impact of the plan.</p>	
James Bessant (lpr2315)	<p><i>(Personal information removed)</i> we have only recently become aware of the extensive proposed housing development on the land between Thatcham and where we live.</p> <p>Whilst the need to improve infrastructure in the local area is clearly a priority, expanding the size of Thatcham by such an enormous size will lead to far larger issues in the surrounding areas. Greater investment should be allocated for the existing local infrastructure rather than stressing the area further with such a huge increase in population.</p> <p><i>(Personal information removed)</i> we have noted the excessive amount of traffic which uses the village as a cut through. This is during a period of national lockdown so our expectations are for this to be significantly greater once conditions are relaxed again. If you were to add an extra 2,500 houses (approximately 5,000 cars), this will only exacerbate the issue further. Many of these vehicles significantly exceed the 30mph speed limit creating a real danger to the many people who walk in and around the village.</p> <p>Greater levels of traffic will also cause other issues in the town. The Thatcham railway station is already a significant pinch point with wait times often exceeding 10 minutes (leading to large backlogs of traffic). If this development goes ahead as planned, the existing road network</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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	<p>to cross the railway line is simply not able to cope (by the time you reach the railway gate, it will be coming down again leading to waits of over 30 minutes to get past the barrier). This is not acceptable in a small market town.</p> <p>The wider environmental impact in and around an area of natural beauty is simply not acceptable. This is a rural area and by pushing through such a significant housing estate, there will only be a small area of woodland between Thatcham and Upper Bucklebury. These are two distinct locations and you will effectively be making us into a suburb of Thatcham. The fragile ecosystem in the woodland between the two areas will also be greatly affected by the increase in noise, pollution and people.</p> <p>Common sense needs to be used with neither residents of Thatcham or Upper Bucklebury wishing to see this eyesore development go ahead. Budgets should be prioritised to improve the existing town for the people who already live here rather than spending more to accommodate newcomers who will only further widen the issues that exist within the local community.</p>	<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>

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<p>Natalie Munir (lpr2298)</p>	<p>I would like to formally register my objection to the proposed development of 2500 houses at NE Thatcham for the following reasons:</p> <p>It will dramatically reduce the greenbelt between Thatcham and Upper Bucklebury.</p> <p>The rural nature of this area would be completely lost with Upper Bucklebury becoming part of Thatcham.</p> <p>It would be a massive over development of our beautiful countryside in an area which consists of rolling hills and farmland. If developments of this scale are approved there will not be any open rural areas left for future generations to enjoy.</p> <p>The proposed land is not particularly suitable for development as it is very hilly land and has had issues as a flood plain area.</p> <p>The view that Thatcham is best placed to take a development of this size in this location is misplaced, un-proven and ill-conceived.</p> <p>This development will have a significant impact on traffic levels and the associated pollution throughout the area, especially increasing:</p> <p>Traffic and speeding through Upper Bucklebury, which is already a significant and serious concern, especially as we have children who walk along this road to the Primary School.</p> <p>Traffic from Thatcham through Upper Bucklebury to Chapel Row on roads which are not designed for large traffic volumes.</p>	<p>The site is not within the Green Belt (there is no Green Belt in this District).</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council’s housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver ‘a network of green infrastructure which will include a new community park linking Thatcham to the AONB.’</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham’s flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the</p>

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	<p>Traffic on the route into Thatcham and Newbury. These roads approaching the station are already heavily congested at busy times and in the event of any minor traffic disruption.</p> <p>It will significantly increase the noise and light pollution to the Bucklebury residents. There are no street lights in Upper Bucklebury.</p> <p>There is no evidence that this development will enhance Thatcham town centre (or the area in general).</p> <p>It is not likely to attract new businesses to the area or create or significantly increase employment.</p> <p>The local shop and pub are unlikely to benefit. The local shop is under significant threat as the new development includes retail.</p> <p>This level additional of housing will inevitably have an adverse impact on local facilities, schooling, medical and welfare services which are already overstretched.</p> <p>It will be another area of the environment that is destroyed with an immediate detrimental impact on protected wildlife and the destruction of natural vegetation.</p> <p>To conclude this development is unnecessary, inappropriate and ill-conceived and should be rejected.</p> <p>Observations - As a local resident I find the comment by Councillor Hilary Cole reported in the Newbury Weekly News that <i>"We are very keen to work with the local community..."</i> a pleasant surprise and I would be interested to know when it is going to commence.</p>	<p>A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p>



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	<p>Up to now I was under the impression that WBC was committed to keep a substantial greenbelt between Thatcham and Upper Bucklebury. The consideration of this approval now certainly seems to totally contradict this stated commitment.</p> <p>Finally, why is WBC are now considering this development when a previous application was rejected by the secretary of state in 2017?</p>	<p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>
Andrew Peddie (lpr1039)	<p>I am writing to register an objection/opposition to the proposed development to the north east of Thatcham, namely the possible development of some 2500 houses south of Upper Bucklebury. It would mean further degradation of the countryside to the north east of Thatcham and would threaten the integrity of Bucklebury Common. It will also put enormous further pressure on amenities in Thatcham which is already poorly served in that respect.</p>	<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p>

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		<p>In relation to the concerns on the potential impact on Bucklebury Common, the development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population).</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>
Mr Kastelnik (lpr2294)	I strongly object to houses being built in this area, this will be an overdevelopment in the Thatcham area, it will impact on the traffic congestion and generate extra pollution, loss of rural countryside and green belt.	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p> <p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there</p>

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		<p>were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

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		<p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Within the site it is proposed to include a network of green infrastructure which will include a new community park linking Thatcham to the AONB.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new community park linking Thatcham to the AONB.'</p> <p>The site is not within the Green Belt (there is no Green Belt in this District).</p>
Clinton Clay (lpr1265)	<p>After reviewing the proposal I want to formally object to the plan for the following reasons;</p> <p>The number of houses will put enormous strain on the infrastructure which already is unable to cope with normal everyday traffic, causing excessive delays and air pollution. The roads around Thatcham and the local villages will not be safe for pedestrians and cyclists, anyone currently living in these areas are well aware of the dangers. Hart's Hill is particularly dangerous, there is no safe way to walk or cycle along it.</p> <p>This proposal will without doubt inflict more traffic on the narrow lanes around Bucklebury causing extensive damage to hedgerows, banks</p>	<p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead</p>

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	<p>and watercourses, impacting wildlife and biodiversity. The current levels of traffic does enough structural damage already.</p> <p>The A4 between Thatcham and Newbury is a bottleneck during peak periods and this can only get worse. The Thatcham railway crossing already causes huge delays.</p> <p>If the development goes ahead then the developers must be forced to include a bridge over the railway at their cost as part of the infrastructure planning. To not do this would be an unforgivable oversight by WBC.</p> <p>Schools, Hospitals and GP surgeries will also come under pressure. In addition Thatcham has insufficient activities for young people and it must be said that the town centre is hardly appealing as a place for entertainment and social activities.</p> <p>The encroachment towards areas of outstanding natural beauty is of concern as once the boundaries become merged the beauty is lost for ever. A small insufficient green boundary of a few meters is not at all adequate.</p> <p>I sincerely hope that comments and objections raised during the review are given serious consideration and that they may affect the size, scope and design of the development.</p> <p>My concern/scepticism is borne by recent major expenditures around the area now destined for housing, all of which seemed out of proportion based on the needs at the time.</p> <ol style="list-style-type: none"> <li>1. The flood alleviation scheme at the bottom of Harts Hill</li> <li>2. The flood alleviation scheme along Tull Way</li> </ol>	<p>without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>Concern regarding infrastructure provision is noted. Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p>

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	<p>3. The massive fresh water pumping station and distribution system part way up Harts Hill.</p> <p>These seemed at the time expensive and unnecessary projects but clearly essential to support a large housing development. I suspect this was the plan all along. Hence my scepticism about this review.</p> <p>Please prove me wrong.</p>	<p>In regards to impact on the North Wessex Downs Area of Outstanding Natural Beauty, the Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which takes account of the AONB and which will provide the context within which any proposed development would need to conform. The LCA notes that whilst there is no strong inter-visibility between the site and the AONB it does lie close to it and concludes that the site does form part of the setting of the AONB. The LCA will be published as part of the council's evidence base to inform the proposed allocation.</p> <p>The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>With any application that would come forward on this site, the developers would be expected to submit a 'masterplan' / visual representation, with accompanying explanatory text, to provide details in relation to matters such as the parameters of the site, height parameters, green open space, etc.</p>
Dave Norman (lpr1458)	<p>I am writing to express my alarm and some concerns over the proposed North East Thatcham Development proposal.</p> <p>In my view the proposal is one of gross overdevelopment which encroaches on an AONB, destroys acres of countryside and obliterates the Thatcham green belt. It would leave Thatcham virtually joined to Upper Bucklebury.</p> <p>The need for 2500 houses is also in question.</p>	<p>Thatcham is an 'Urban Area' as set out in the spatial strategy (for the existing Core Strategy and in the LPR), which is a prime focus for housing development, alongside Newbury and the Eastern Urban Area. The Core Strategy allowed Thatcham a period of consolidation following developments within the town, notably the former MOD site. However, the Inspector's report for the Core Strategy notes that Thatcham should be a location to consider for additional housing, in any review to accommodate more housing. More housing is now required, and the Council, mindful of the strategic allocation at Newbury, are exploring further housing development in an Urban Area.</p>

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	<p>The effect of 2500 properties in the designated area would have a major effect on Upper Bucklebury in terms of traffic. Even without problems on the A4 the road through Upper Bucklebury is extremely busy at certain times of the day. Cars from even half of 2500 houses would add to the dangers and the pollution in the village let alone the hazards on Harts Hill. At night there is also a concern regarding light pollution. There are very few street lights in Upper Bucklebury, just a few on Burdens Heath. Light from the new development would certainly impact on the night sky which at the moment we in the village enjoy. The development would also have a massive detrimental effect on the wildlife which at the moment thrives in the area. The development comes much too close to Blacklands Copse and other natural habitats which would suffer badly.</p> <p>Whilst I am not against developments and house building where necessary, I do feel this proposal has not been thought through properly, raises many environmental concerns as well as potentially destroying precious countryside. Please consider alternative brown field sites which I am sure are available.</p>	<p>The scale of the development is considered to bring about the infrastructure needed to support the development without harming the town. Benefits arise from the development, including formal and informal green infrastructure, active travel routes, education and community facilities, and highway improvements.</p> <p>In relation to housing requirement for the District, the local housing need (LHN) is calculated according to the government's standard method, which has been revised since the onset of the pandemic, but has not changed for West Berkshire (other than a small increase to 513 dwellings per annum due to slightly changed housing affordability ratios published in March 2022).</p> <p>Para 61 of the 2021 NPPF states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard methodology in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.</p> <p>The Council does not consider there are exceptional circumstances to justify an alternative approach and the available evidence does not support any reduction of the local housing need figure.</p> <p>The calculation of housing need does not take account of any of the potential sources of supply. That is a separate consideration.</p>

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		<p>The housing requirement has been expressed as a range in order to allow for flexibility and ensure that the minimum LHN is met.</p> <p>The upper end of the range has been proposed to allow for approximately 5% additional homes The use of a range helps the Council meet the objective of boosting housing supply but also ensures that the Council is not assessed for the Housing Delivery Test against substantially higher numbers than the housing need based on the standard methodology.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>



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		<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p>
Elizabeth Tritschler (lpr1357)	<p>I would like to voice my concern and objection to the proposed development of 2,500 houses along the A4 and Floral Way.</p> <ol style="list-style-type: none"> <li>1. <b>Of the residents of Upper Bucklebury who are aware of the proposal the majority are against the development but there are many residents who are not aware of the application or consultation. In order to obtain a fair assessment of opinion I believe that all resident who will be affected by the development should be consulted. This is not a small development but will a lasting impact on the nature of not only Upper Bucklebury residents but the surrounding villages, the Town on Thatcham and more importantly in my view the countryside and animals which live there. It is vital that we protect the beauty of our green spaces for future generations.</b></li> <li>2. <b>The timing of the consultation has not been sufficient for the communities affected to fully research what the impact</b></li> </ol>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The consultation was run in accordance with the council's Statement of Community Involvement (SCI). A public consultation such as this is would usually last 6 weeks but because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that "We continue to want to see Local Plans progressing through the system as a vital means for</p>

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	<p><b>will be. West Berkshire Council appear to have timed the consultation specifically for a period when people were focused on the Christmas break, the effects of the Lockdown and Brexit.</b></p> <p><b>3. It feels to a large degree to be a "done deal" using the argument that this is the only available space for housing to go. Every generation has a responsibility to those who come after to protect our green spaces for future generations. If the past year has taught us anything it is the importance of these open green spaces for the health and wellbeing of the community. I feel that the council should look to negotiate a reduction in the allocated numbers if suitable locations are not available and look at the development of brownfield sites. Office spaces in Overbridge Square Business Park have over the past couple of years been converted into flats. One of the long term effects of the current situation is that a large percentage of office workers will in future be home workers leading to less demand for office space. Surely we should be looking into the possibility of re-developing excess office spaces before tearing up the fields and green spaces that make this a wonderful place to live.</b></p> <p><b>4. The Bucklebury vision and plan is to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This was agreed with West Berkshire Council and should be taken in to account. It is not mentioned in the WBC documentation.</b></p> <p><b>5. The development links Upper Bucklebury with Thatcham removing the rural aspect of Upper Bucklebury. This is specifically mentioned in the WBC documentation and appears to contradict WBC's intentions?</b></p> <p><b>6. A previous application was rejected by the secretary of state in 2017. Why are WBC now considering this in light of previous objections? Please can the reasons for this change be circulated to those that will be affected?</b></p>	<p>supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is</p>

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	<p><b>7. The Newbury Weekly News gave the following statement by Hilary Cole</b></p> <p><b>"We are very keen to work with the local community because it is such a big proposal and development for Thattham. We have taken a conscious decision to do this around Thattham so it will deliver the infrastructure we need. We felt that Thattham is best placed to take a development of this size"</b></p> <p><b>What work has been done to work with the local community - I have not seen any attempt to inform the community at large of the proposed development.</b></p> <ol style="list-style-type: none"> <li><b>1. The proposed development will have a significant impact on the level of traffic in the area. The road up Hearts Hill into Upper Bucklebury and then on to Cold Ash or Chapel Row is not sufficient to take the resulting increased traffic.</b></li> <li>2. Upper Bucklebury currently has a problem with traffic speeding through the village - this can only increase with traffic expected to increase by 12%. How has this percentage been calculated? What studies were carried out? Even a 12% increase would have a huge impact in a village where children have to cross the road to reach the primary school and where in some areas there are no footpaths and people often walk along the roads.</li> <li>3. 12% seems to be rather optimistic. With the proposed number of houses it is not difficult to predict that Harts Hill then either travelling through Cold Ash or Chapel Row will in a very short time be used as an alternative route putting residents at risk from excess traffic and the added pollution.</li> <li>4. There is no mention of the development of Thattham Town centre which has been in decline over the past years.</li> <li>5. What budget has been allocated to the "country park" and exactly what is the "country park" going to be?</li> <li>6. Flood risk and surface water drainage does not appear to have been considered – this is of concern in an area where there</li> </ol>	<p>necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thattham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways</p>

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	<p>was extensive surface water flooding in Thatcham in 2007. Although flood alleviation scheme has been implemented this will not be sufficient if the proposed development goes ahead. Relying of developers for implementing flood alleviation measures, who have a poor record in this area is a huge concern.</p> <p>7. The proposal to increase the size of Thatcham by 25% is a clear example of overdevelopment. The impact on the Town can only be negative. There is already insufficient parking in the town and train station and long traffic delays around the crossing. This does not appear to have been considered. The distance from the development to the train station mean that many will not consider walking a viable option.</p> <p>8. The train crossing currently causes long delays this can only increase with increased traffic.</p> <p>9. The two doctor's surgeries which will be affected initially before a new surgery is built within the development include the Chapel Row surgery where I am registered. Currently this practice is extremely busy and it takes often days if not weeks to arrange for an appointment. Additional patient added to an already oversubscribed practice is likely to put lives at risk.</p> <p>10. The additional visitors to the parish, the common and "Country Park" can only have a detrimental effect on wildlife. Habitats need to be protected and specialist advice should be sought in order to conserve the natural diversity of in the area. A development of this size would threaten the woodlands and rare habitats.</p> <p>11. You cannot overestimate the negative impact of this development on the village of Upper Bucklebury. With the development creeping up the hill, Upper Bucklebury will all but merge with Thatcham, separated by a small area at the end of Long Grove. This cannot be a good thing for the village. The current footpath along Long Grove to Colthrop has in the past year seen increased footfall. This would increase substantially which would inevitably lead to increased repairs and</p>	<p>and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

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	<p>maintenance requirements. Does the council expect the residents of Long Grove to continue to repair and maintain their road for the benefit on non-parishioners?</p> <p>12. What exactly is the Country Park intended to be? It appears to be a narrow strip on the steeper slopes of the area earmarked for development to appear to separate the new Thatcham development from Upper Bucklebury - This has fooled no one. How is the area to be maintained?</p> <p>In conclusion I would like to register my objection to these plans. The impact on Upper Bucklebury will be extremely detrimental to what is currently a peaceful village whose inhabitants value the beauty of and tranquillity of the surrounding countryside. I find it difficult to understand how anyone could believe increasing Thatcham by 25 % could possibly not change the nature of the town, surrounding villages and the area earmarked forever.</p>	<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery</p>

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		<p>Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
	<p>I would like to voice my concern and objection to the proposed development of 2,500 houses along the A4 and Floral Way.</p> <p>1. <b>Of the residents of Upper Bucklebury who are aware of the proposal the majority are against the development but there are many residents who are not aware of the application or consultation. In order to obtain a fair assessment of opinion I believe that all resident who will</b></p>	<p>In relation to consultation publicity, the consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p> <p>The consultation was run in accordance with the council's Statement of Community Involvement (SCI). A public consultation such as this is would usually last 6 weeks but</p>

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	<p><b>be affected by the development should be consulted. This is not a small development but will a lasting impact on the nature of not only Upper Bucklebury residents but the surrounding villages, the Town on Thatcham and more importantly in my view the countryside and animals which live there. It is vital that we protect the beauty of our green spaces for future generations.</b></p> <p><b>2. The timing of the consultation has not been sufficient for the communities affected to fully research what the impact will be. West Berkshire Council appear to have timed the consultation specifically for a period when people were focused on the Christmas break, the effects of the Lockdown and Brexit.</b></p> <p><b>3. It feels to a large degree to be a "done deal" using the argument that this is the only available space for housing to go. Every generation has a responsibility to those who come after to protect our green spaces for future generations. If the past year has taught us anything it is the importance of these open green spaces for the health and wellbeing of the community. I feel that the council should look to negotiate a reduction in the allocated numbers if suitable locations are not available and look at the development of brownfield sites. Office spaces in Overbridge Square Business Park have over the past couple of years been converted into flats. One of the long term effects of the current situation is that a large percentage of office workers will in future be home workers leading to less demand for office space. Surely we should be looking into the possibility of re-developing excess office spaces before tearing up the fields and green spaces that make this a wonderful place to live.</b></p> <p><b>4. The Bucklebury vision and plan is to maintain a strong greenbelt between Thatcham and Upper Bucklebury. This was agreed with West Berkshire Council and should be</b></p>	<p>because it did go over Christmas, it ran in total for an 8 week period between 11 December 2020 and 5 February 2021.</p> <p>In relation to the consultation taking place during the coronavirus pandemic, the Government published guidance in May 2020 with regard to planning and COVID 19: <a href="https://www.gov.uk/guidance/coronavirus-covid-19-planning-update">https://www.gov.uk/guidance/coronavirus-covid-19-planning-update</a>. This stated that "We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the government's aspirations to have plans in place across the country by 2023."</p> <p>A written ministerial statement (<a href="https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720">https://questions-statements.parliament.uk/written-statements/detail/2021-01-19/hcws720</a>) published on 19 January 2021 set out the importance of work continuing to advance on Local Plans through to adoption by the end of 2023 to help ensure that the economy can rebound strongly from the pandemic.</p> <p>Changes were made to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021.</p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the HELAA. The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several</p>

Respondent (with lpr ref)	Response	Council Response
	<p>taken in to account. It is not mentioned in the WBC documentation.</p> <ol style="list-style-type: none"> <li>5. <b>The development links Upper Bucklebury with Thatcham removing the rural aspect of Upper Bucklebury. This is specifically mentioned in the WBC documentation and appears to contradict WBC's intentions?</b></li> <li>6. <b>A previous application was rejected by the secretary of state in 2017. Why are WBC now considering this in light of previous objections? Please can the reasons for this change be circulated to those that will be affected?</b></li> <li>7. <b>The Newbury Weekly News gave the following statement by Hilary Cole</b></li> </ol> <p><b>"We are very keen to work with the local community because it is such a big proposal and development for Thatcham. We have taken a conscious decision to do this around Thatcham so it will deliver the infrastructure we need. We felt that Thatcham is best placed to take a development of this size"</b></p> <p><b>What work has been done to work with the local community - I have not seen any attempt to inform the community at large of the proposed development.</b></p> <ol style="list-style-type: none"> <li>1. <b>The proposed development will have a significant impact on the level of traffic in the area. The road up Hearts Hill into Upper Bucklebury and then on to Cold Ash or Chapel Row is not sufficient to take the resulting increased traffic.</b></li> <li>2. Upper Bucklebury currently has a problem with traffic speeding through the village - this can only increase with traffic expected to increase by 12%. How has this percentage been calculated? What studies were carried out? Even a 12% increase would have a huge impact in a village where children have to cross the road to reach the primary school and where in some areas there are no footpaths and people often walk along the roads.</li> </ol>	<p>sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>There is no green belt within this area (or within the District) there will be open space maintained along the northern/north eastern part of the site.</p> <p>The separate and distinctive identities of Thatcham, Cold Ash and Upper Bucklebury help define those communities and it is acknowledged that should the site be developed there will be a reduction in the physical separation between them. The council is clear that the retention of these actual and perceived visual breaks remain important for the continued retention of the existing settlement form, pattern and character. To that end, any development on the site will be landscape-led and retaining and protecting the separation and identity of individual settlements will be embedded into the design process.</p> <p>Siege Cross was refused on a number of technical issues, including being outside of the settlement boundary, the Council being able to demonstrate an up-to-date 5 year housing supply, adverse impact on education provision, adverse landscape and visual impact, and failure to provide a planning obligation to enable necessary infrastructure and mitigation. As part of the appeal, both the Planning Inspector and the (then) Department for Communities and Local Government (DCLG) considered that, subject to mitigation, the development would be</p>



Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>3. 12% seems to be rather optimistic. With the proposed number of houses it is not difficult to predict that Harts Hill then either travelling through Cold Ash or Chapel Row will in a very short time be used as an alternative route putting residents at risk from excess traffic and the added pollution.</li> <li>4. There is no mention of the development of Thatcham Town centre which has been in decline over the past years.</li> <li>5. What budget has been allocated to the "country park" and exactly what is the "country park" going to be?</li> <li>6. Flood risk and surface water drainage does not appear to have been considered – this is of concern in an area where there was extensive surface water flooding in Thatcham in 2007. Although flood alleviation scheme has been implemented this will not be sufficient if the proposed development goes ahead. Relying of developers for implementing flood alleviation measures, who have a poor record in this area is a huge concern.</li> <li>7. The proposal to increase the size of Thatcham by 25% is a clear example of overdevelopment. The impact on the Town can only be negative. There is already insufficient parking in the town and train station and long traffic delays around the crossing. This does not appear to have been considered. The distance from the development to the train station mean that many will not consider walking a viable option.</li> <li>8. The train crossing currently causes long delays this can only increase with increased traffic.</li> <li>9. The two doctor's surgeries which will be affected initially before a new surgery is built within the development include the Chapel Row surgery where I am registered. Currently this practice is extremely busy and it takes often days if not weeks to arrange for an appointment. Additional patient added to an already oversubscribed practice is likely to put lives at risk.</li> <li>10. The additional visitors to the parish, the common and "Country Park" can only have a detrimental effect on wildlife. Habitats need to be protected and specialist advice should be sought in</li> </ol>	<p>appropriate and contribute to delivering housing in a suitable location. The Inspector noted that the Core Strategy Inspector highlighted that new development might contribute to the improved infrastructure and other changes desired by the Council. The Siege Cross scheme would have the potential to provide financial support, to the benefit of educational, open space and community facilities, and investment in highways and flood control. The benefits of the scheme would not be significantly or demonstrably outweighed by adverse impacts.</p> <p>The Core Strategy Inspector (in 2012) considered that 'in any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position in the top tier of the settlement hierarchy' (paragraph 67 of the Core Strategy Inspector's Report). As additional housing is required, and given Thatcham's status as an 'Urban Area' in the development plan is it considered appropriate to consider Thatcham for housing.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed</p>

Respondent (with lpr ref)	Response	Council Response
	<p>order to conserve the natural diversity of in the area. A development of this size would threaten the woodlands and rare habitats.</p> <p>11. You cannot overestimate the negative impact of this development on the village of Upper Bucklebury. With the development creeping up the hill, Upper Bucklebury will all but merge with Thatcham, separated by a small area at the end of Long Grove. This cannot be a good thing for the village. The current footpath along Long Grove to Colthrop has in the past year seen increased footfall. This would increase substantially which would inevitably lead to increased repairs and maintenance requirements. Does the council expect the residents of Long Grove to continue to repair and maintain their road for the benefit on non-parishioners?</p> <p>12. What exactly is the Country Park intended to be? It appears to be a narrow strip on the steeper slopes of the area earmarked for development to appear to separate the new Thatcham development from Upper Bucklebury - This has fooled no one. How is the area to be maintained?</p> <p>In conclusion I would like to register my objection to these plans. The impact on Upper Bucklebury will be extremely detrimental to what is currently a peaceful village whose inhabitants value the beauty of and tranquillity of the surrounding countryside. I find it difficult to understand how anyone could believe increasing Thatcham by 25 % could possibly not change the nature of the town, surrounding villages and the area earmarked forever.</p>	<p>by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.</p> <p>An economic advantage of new development is that new residents can help support local shops and businesses and help to boost the vibrancy and vitality of town and local centres.</p> <p>The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. The updated version of the proposed allocation policy in the next published version of the LPR will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p> <p>In regards to concerns raised in relation to the risk of flooding, new flood alleviation measures would be built in to the development. There is a current planning application (as of 1st February 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy. Flood attenuation schemes are included in the IDP.</p> <p>In relation to potential impact on surface water, all new development must include sustainable drainage measures, and development must be avoided on areas that are at risk of</p>

Respondent (with lpr ref)	Response	Council Response
		<p>surface water flooding. Development on the site will be expected to deliver surface water management approaches that could deliver a net gain for Thatcham town. Drainage and flood attenuation works are included in the IDP.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, and as part of the masterplanning work liaison has taken place with infrastructure providers. The IDP is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>The site alongside the larger site area, is well related to the existing town of Thatcham. It is in close proximity to a range of services and facilities, including the train station. Thatcham is an urban area with a wide range of services and opportunities for employment, community and education. Development of a strategic nature at this site would support the service provision and regeneration that Thatcham requires.</p> <p>The development would involve a significant amount of open space which would be expected to serve the new population (and benefit the existing population). Highway works and active travel routes would assist in directing residents to using the A4/Floral Way rather than Harts Hill Road, and using an enhanced cycling and walking network to travel, including to Thatcham train station. Residents would make use of the newly provided education facilities on the site, which would not be expected to purposefully attract pupils from Bucklebury primary school.</p>
Catherine Allison (lpr1473)	I Strongly object to the building of 2500 houses on the farmland between upper Bucklebury and the A4 and floral way. This will be detrimental to our wildlife. Animal's bird's butterfly's insects will all be	In relation to wildlife impact, a baseline assessment of the site was undertaken by the Thames Valley Environmental Research Centre (TVERC) and is referred to in the Housing and

Respondent (with lpr ref)	Response	Council Response
	<p>severely affected and species will die. There's also the question of overdevelopment in this area with. Increased traffic and probably more deaths on the road. Yet more pollution will further affect our neighbourhood and wildlife. We have responsibilities towards the animal kingdom and you will be responsible for many deaths if this development goes ahead. It is a grave mistake to undergo such a devastatingly damaging project.</p>	<p>Economic Land Availability Assessment (HELAA), one of the LPR evidence documents. The covering report from TVERC will be published on the Council's website to support the proposed submission version of the LPR, as will the individual assessments.</p> <p>The updated version of the proposed allocation policy will require that any application is supported by an ecology strategy which will set out how priority habitats and ecological features will be protected and enhanced.</p> <p>In relation to the matters raised in regards to transportation, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and</p>

Respondent (with lpr ref)	Response	Council Response
		<p>lifestyle choices will be important elements of the overall transport plan.</p> <p>In relation to concerns regarding pollution, the LPR includes a range of policies including DM4: Environmental nuisance and pollution, DM5 Water Quality, DM6: Water Resources and Waste Water and DM7: Air Quality. These policies address concerns relating to pollution as they ensure development proposals are considered against their potential impact on contamination, air, light, water and/or noise pollution whilst aiming to help improve local environmental conditions such as air and water quality. These policies have been revised following the regulation 18 consultation to strengthen the Council's policy on pollution.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP18 Housing Type and Mix

#### (Proposed Submission LPR Policy: SP18 Housing Type and Mix)

Number of responses received: 13

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Greenham Parish Council (lpr903)	Support policy. Greenham Parish Council wishes to strengthen support for community needs housing: including self-build, co-housing, etc. The housing market lacks innovation and fails to meet a wide range of needs. Greenham Parish Council believes that housing designed mainly by and built for those who intend to live in it themselves is generally of a better quality than what the major volume home builders produce.	Comments noted. The final paragraph of the Policy gives Council support for the development of housing schemes that are initiated by local communities involving affordable housing, co-housing, community self-build, or housing for people with specific needs such as older people or those with disabilities.
Hungerford Town Council (lpr141)	Support policy	Support noted
Newbury Town Council (lpr2257)	We broadly support this policy. <b>Reason:</b> We wish to strengthen support for community needs housing: self-build, co-housing, etc. The housing market lacks innovation and fails to meet a wide range of needs. We believe that housing designed mainly by and built for those who intend to live in it themselves is generally of a better quality than what the major volume home builders produce, because their main duty is maximising shareholder profit, and they have to an unhealthy extent dominated the land market.	Comments noted. The Council's starting position should be to look favourably upon schemes initiated by the local community. Amend final paragraph of Policy as follows: 'In order to support local communities to meet their housing needs the Council <del>may</del> <u>will normally</u> support the development...'

Respondent (with lpr ref)	Response	Council Response
	<p><b>Change Proposed:</b> In last paragraph, change “may” to “will normally” in first line.</p> <p>Amend 6.53 in supporting text by adding sentence at end: “The definition of ‘local community group’ includes any such group including members having a connection to West Berkshire.”</p>	<p>Also amend supporting last paragraph by adding the following at the end:  <u>‘Local communities includes any group with members that have a connection to West Berkshire, for example residents or people who work in the District.’</u></p>
Shaw-cum-Donnington Parish Council (lp212)	Support policy	Support noted
Stratfield Mortimer Parish Council (lpr403)	<p>Support the policy in general BUT it does not allow for NDPs to set more demanding requirements e.g. number of bungalows for downsizers.</p> <p>Suggest that wording be included to enable NDPs to set more demanding requirements if justified by way of an assessment of need conducted by a qualified independent body.</p>	<p>Comments noted.</p> <p>Neighbourhood plans can set requirements that differ to those set out in Local Plan policies if supported by appropriate evidence of local need, such as a local housing needs survey. The requirement would also need to be in general conformity with the strategic policies of the Local Plan (including strategic Policy SP18). A Housing Needs Assessment would need to be produced by the neighbourhood planning group in order to demonstrate whether there is evidence to justify a departure from the LPR policy.</p> <p>Given the expected increase in the number of older people during the plan period and the specific needs of those with long-term health conditions and disabilities, there is a requirement for homes which are adaptable and accessible. The provision of low level accommodation can assist in this, although it is recognized that bungalows are relatively land intensive and have viability issues. The Policy has been amended by the addition of criteria to require all new dwellings to meet the higher accessibility standards under Part M4 (2) of the Building Regulations.</p>
Thatcham Town Council (lpr1402))	Support policy.	Comments noted

Respondent (with lpr ref)	Response	Council Response
	We agree that a mix of housing will be required that needs to be reviewed regularly to reflect demand.	
<b>General consultation bodies</b>		
<b>Other stakeholders</b>		
Julian Dobbins (lpr2457)	<p><i>[Comments also in SP17 lpr1257]</i></p> <p><b>Failure to acknowledge housing needs based on household type, nor recognise the opportunities for commercial property re-use and town centre regeneration</b></p> <p>SP12 (Approach to Housing Delivery) states:  <i>Provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. The target figure of 575 dwellings per annum does not constitute a ceiling or cap to development.</i></p> <p>In the most recent ONS household forecast data, which covers the period 2018 - 2028, the entirety of West Berkshire's housing growth is described as 2482, suggesting a 'necessary' annual figure (at least for the period covered) much lower than put forward in this proposal.</p> <p>Furthermore, regarding housing mix, the proposal (table 3 in SP12) shows that 60% - 70% of Market housing and 35% - 45% of Affordable housing will be 3 or 4 bedroom houses. ONS data shows that by far the highest growth in housing demand for West Berkshire will come from one-person households (10.7%, versus growth rates of -6%, -8.9% and -11.2% for families with 1, 2 or 3+ dependent children respectively).</p> <p>Given the housing mix suggested by the ONS forecast data, the proposal seems completely out of touch with the reality of local needs. In light of the changing nature of town centres, as retail moves on online, and an ageing population needing access to public transport, does it not make much more sense to repurpose unused commercial property for residential use, and in doing so change the declining nature of the high street, provide easier access to local facilities (especially for the ageing population) and reduce</p>	Comments noted. As they relate to Policy SP17 they will be considered as part of the Council's response to comments made under that policy.



Respondent (with lpr ref)	Response	Council Response
	dependency on short car journeys clogging our streets and adding to the community's carbon footprint?	
Richard Foster (lpr2453)	<p>Object to policy.</p> <p><b>Affordable Housing</b></p> <ol style="list-style-type: none"> <li>1. Policy SP 18 says that the Council <b>may support</b> schemes that <b>may involve</b> affordable housing etc. Too many “<b>mays</b>”! This is real cop-out stuff. It should say that the Council <b>will require the implementation of</b> schemes that <b>provide</b> affordable housing etc.</li> <li>2. The council must ensure that affordable housing is built to the same standards as the remainder of the development and that the consequent reduction in developers' profits caused by reduced pricing must not be allowed to reduce or compromise their provision of infrastructure and services as mentioned in the section above</li> </ol>	<p>Comments noted .</p> <p>The Council agrees that the starting position should be to look favourably upon schemes initiated by local communities.</p> <p>Amend final paragraph of Policy as follows: ‘... the Council <del>may</del> <u>will normally</u> support the development...’</p> <p>The Council agrees that affordable housing must be high quality and will be expected to meet the same standards and policy requirements as open market housing. The Council considers that no change is required to this policy because these expectations are well established elsewhere in the Plan, including in Affordable Housing Policy SP19.</p>
Paula Saunderson (lpr967)	<p>Whilst answering this I cannot see Table 4 but if it does not include a breakdown of existing stock by type and mix than this LPR should be put on hold until that work is completed</p> <p>Likewise Population growth figures will need reviewing given a static or falling birth rate, a rising death rate, and a decrease in life expectancy - all existing trends and not just due to the pandemic.</p>	<p>Comments noted.</p> <p>Typographical error which will be corrected. Policy should refer to the requirements of Table 3 in the supporting text and not Table 4.</p> <p>The Local Plan housing requirement is informed by a number of factors including existing stock and population projections.</p> <p>An important starting point is to understand the current balance of housing in the area. Table 6.3 of the updated Local Housing Need evidence undertaken by Icen, July 2022 provides a breakdown in the sizes of homes in different tenure groups across areas. See also SHMA, 2016 and previous LHN assessment, 2020. The data shows a market stock (owner-occupied) that is dominated by 3+-bedroom homes making up 79% of the total in this</p>

Respondent (with lpr ref)	Response	Council Response
		<p>tenure group, a slightly higher proportion than seen in other locations.</p> <p>Table 3 sets out an updated the future required mixed and type of housing to be provided.</p>
<p>Sovereign Housing Association Ltd. (lpr2162)</p>	<p>We would ask that table 3 “Housing size by number of bedrooms” be used as a start point, and that flexibility be built in where HA’s would support a variation to the mix - responding to prevailing conditions that suggest a different mix would be appropriate.</p> <p>As a key stakeholder SHA would welcome the opportunity to be involved earlier in the engagement process where the location and mix of tenure of new homes delivered through s.106 planning arrangements are agreed (even if SHA might not ultimately, be successful in purchasing the homes from the developer). This could be an opportunity to influence policy cross-over, and tenure mix - to create balanced communities. For example we have seen limited demand for 1 bedroom accommodation in less accessible locations where they would be more suited to a town centre environment for a large allocation.</p> <p>One clear impact of Covid-19 is that housing intelligence shows a drop in demand for apartments, and a growing desire for outside space, study spaces, and preference for maisonettes rather than flats for multi occupant households.</p> <p>On suburban schemes we have seen a preference by developers to build flats where 1 and 2 bed accommodation is mentioned, we would prefer to see maisonettes and housing where appropriate with outside space - ideally garden space, but with balconies as a secondary option.</p> <p>SHA is developing a Live Well Age Well approach to how we can provide housing options, support and services to help our communities to Live Well. This ties in well with the aims of the Housing Strategy and we would want to work closely with the Council to develop some local approaches to Ageing Well in West Berkshire.</p> <p>Local population growth is largely amongst older age groups. What do we know about their housing needs? Meeting the needs of older people appears to be seen in terms of bricks and mortar. How do we enable this group across the borough?</p>	<p>Comments noted.</p> <p>The housing mix expected in the policy is based on the Strategic Housing Market Assessment, Housing Needs Evidence, and affordable housing viability report.</p> <p>The policy for a mix of homes does not prescribe the size and type of homes. It is the starting point for individual sites which developers will be expected to have regard.</p> <p>The Council's view is that the policy already provides sufficient flexibility to allow for deviation from the expected housing mix, including evidence related to site viability or changes to other evidence, and no changes to the policy are therefore needed. Clearly site locations and characteristics as well as viability would play a part in the exact final determination of the exact type and mix. The Council is committed to working with and consulting all stakeholders and interested parties as part of the planning application process.</p> <p>Updated evidence on the housing needs of the elderly population has been established in the Local Housing need Assessment, 2022 and taken into account in revised Policy DM 19: Specialist Housing Provision in the publication version of the plan.</p>

Respondent (with lpr ref)	Response	Council Response
Councillor Tony Vickers (lpr553)	<p>Support policy. We broadly support this policy, especially the emphasis on a mix of unit sizes and tenures. We wish to strengthen support for community led housing of all kinds. Changes sought; In last paragraph, change “may” to “will normally” in first line. Amend 6.53 in supporting text by adding sentence at end: “The definition of ‘local community group’ includes any such group including members having a connection to West Berkshire.”</p>	<p>Comments noted</p> <p>The Council agrees and will look favourably upon schemes initiated by local communities. Amend final paragraph of Policy as follows: ‘... the Council may <u>will normally</u> support the development...’</p> <p>Also amend supporting last paragraph by adding the following at the end: <u>‘Local communities includes any group with members that have a connection to West Berkshire, for example residents or people who work in the District.’</u></p>
<b>Landowners, site promoters and developers</b>		
Royal & Sun Alliance PLC (lpr2111)	<p><i>Part of full representation on behalf of Royal &amp; Sun Alliance Insurance promoting residential development at Greenham Road Retail Park</i></p> <p>Policy SP18 relates to housing mix for all forms of residential development. It outlines that developments should provide a mix of dwelling sizes that reflects the requirements of the local housing need evidence. Policy SP18 provides the target unit mix: The proportions of family sized accommodation (3 bedrooms or more) for market and affordable tenures that is being sought in policy is wholly unrealistic for many urban, town centre developments. In light of the Council’s substantial housing targets, we would recommend that the Borough’s housing mix policy allows for greater flexibility and is not indiscriminately applied to all developments. Policy SP18 does acknowledge that site size and location could mean a deviation from the preferred mix would be acceptable, but in our view, greater emphasis should be placed on this as a consideration. As written, said policy could have the unintended consequences of making development unviable and undeliverable and so does not meet the requirements of NPPF Paragraph 16. Changes sought:</p>	<p>Comments noted.</p> <p>The housing mix expected in the policy is based on the Strategic Housing Market Assessment, 2016, Housing Needs Evidence, 2020 and affordable housing viability report.</p> <p>There has also been an update to the LHN evidence by Iceni projects in July 2022 which is taken into account in the review of the housing type and mix required.</p> <p>The Council’s view is that the policy already provides sufficient flexibility to allow for deviation from the expected housing mix, including evidence related to site viability or changes to other evidence. No change to the policy is therefore considered necessary.</p> <p>The policy for a mix of homes does not prescribe the size and type of homes. It is the starting point for individual sites which developers will be expected to have regard.</p>

Respondent (with lpr ref)	Response	Council Response
	We would recommend that the Borough's housing mix policy allows for greater flexibility and is not indiscriminately applied to all developments.	
Lichfields for North East Thatcham consortium (lpr2401)	<p>In the context of overall housing needs the NPPF paragraph 61 states that: <i>"...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)"</i>.</p> <p>The PPG contains specific guidance on how the needs of different groups can be assessed (ID: 67-001 to ID: 67-010 and ID: 63-001 to ID: 63-019).</p> <p><b>Review of Policy SP18</b></p> <p>Policy SP18 requires that residential development should provide 'an appropriate' mix of dwelling tenures, types and sizes to meet current and future needs. The policy directs developments to the mix set out in Table 3 of the draft plan which is the mix identified within the Berkshire SHMA (and subsequent update) or to any more recent evidence published by the Council. Where there is deviation from this mix, it states the Council will have regard to the most up-to-date evidence, appropriate mix based on site size and location, physical factors (for conversions or redevelopment) and viability.</p> <p>With regards to the mix set out in the Berkshire SHMA, the Council should be aware that it represents the overall mix of housing across the district that would be appropriate across the plan period. This could be used by the Council for, for example, monitoring purposes. The Berkshire SHMA itself states:</p> <p><i>"The mix identified ... should inform strategic Local Authority District-wide policies. The mix on any individual site should have regard to the overall need for housing but also consider the character of the site and its surroundings, the characteristics of the housing within the locality, and the accessibility of the location to services and facilities."</i> (Berkshire SHMA p.297).</p> <p>It is not necessary to apply the SHMA's mix to every site individually in order</p>	<p>Comments noted.</p> <p>The housing mix expected in the policy is based on the Strategic Housing Market Assessment, 2016; Housing Needs Evidence, and affordable housing viability report. The Council's view is that the policy already provides sufficient flexibility to allow for deviation from the expected housing mix, including evidence related to site viability or changes to other evidence.</p> <p>The policy for a mix of homes does not prescribe the size and type of homes. It is the starting point for individual sites which developers will be expected to have regard.</p> <p>No change to the policy is needed in this regard.</p> <p>It is a requirement for local plans to be reviewed every five years from adoption at which time the type of housing required will be reviewed using more up to date information available and amended where necessary.</p> <p>Iceni Projects Limited has also produced a further update to the 2020 Local Housing Need evidence document in July 2022. The evidence and findings from which have been taken into account in reviewing and revising of the Policy and the mix of housing by size and tenure.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>to achieve the overall mix identified for the plan period; in fact, it is unlikely that this would be feasible or appropriate. The mix on any site will need to reflect local market demand at the time of delivery and the nature of the surrounding area, in addition to factors such as viability, design and physical constraints. The Council should also be aware of the risks of setting a housing mix policy for a 16-year period on the basis of an evidence document which pre-dates the base year significantly, particularly given that the pandemic could results in changes the ways in which people occupy housing and, as a result, the demand for different types of housing.</p> <p>Changes sought:</p> <p>We would advise against pursuing a policy which seeks to apply a mix from an evidence document which will be produced in the future since, by definition, that evidence has not been tested through the local plan examination process. We would suggest that the reference in SP18 to “<i>or any more recent evidence published by the Council</i>” be removed.</p> <p>On this basis, we would suggest removing reference to the specific mix set out in the Berkshire SHMA from Policy SP18, or, at the very least, state that the Berkshire SHMA will be used as a <i>starting point</i> for mix but that the final mix on any scheme will reflect local, up-to-date evidence, viability, constraints and other relevant factors.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP19 Affordable Housing

#### (Proposed Submission LPR Policy: SP19 Affordable Housing)

Number of responses received: 30

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Greenham Parish Council (lpr904)	GPC strongly supports this policy The reference to the need for all affordable housing to be “built to net zero carbon standards” is welcomed. This is provided similar policies are adopted nationally by LPAs, economies of scale for developers should ensure that the cost of making homes both affordable and sustainable in climate terms should not be excessive.	Comments noted
Hungerford Town Council (lpr142)	We strongly support this policy and welcome the net zero carbon standard for affordable homes in order to support addressing the climate emergency and reduce fuel poverty in these homes.	Comments noted
Newbury Town Council (lpr2256)	We strongly support this policy. <b>Reason:</b> The reference to the need for all affordable housing to be “built to net zero carbon standards” is welcomed. For those who cannot afford market rents or mortgages, the cost of heating and powering their homes is especially important. Provided similar policies are adopted nationally by LPAs, economies of scale for developers should ensure that the cost of making homes both affordable and sustainable in climate terms should not be excessive.	Comments noted

Respondent (with lpr ref)	Response	Council Response
Shaw-cum-Donnington Parish Council (lpr213)	<p>We support the numbers.</p> <p>We are concerned with viability where developers have appealed against affordable requirements with viability assessments. Developers have often purchased land at a high price and then expect to maintain their profit by omitting the affordable housing. In our view that is a problem for the developer. The affordability requirements should only be relaxed in exceptional circumstances, for example with contaminated land.</p> <p>How do you ensure that “affordable houses will be built to net zero carbon standards...”. Although a desirable requirement, this would seem to be a matter for building regulations. Although we do not understand how it could be achieved we support the aim.</p>	<p>Comments noted</p> <p>National planning policy and statutory guidance on viability in planning was revised in 2018 and these changes have been considered in the drafting of this policy.</p> <p>Requirements for new development to meet expected standards will be implemented via development management S.106 agreements and conditions.</p>
Stratfield Mortimer Parish Council (lpr404)	Support Policy	Support noted
Thatcham Town Council (lpr1403)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>We broadly agree with the ambition for affordable housing but draw attention to the resident survey (Annex) in which responses indicate a much stronger demand for protection of green space than the availability of affordable homes.</p> <p>We agree with the statement "Affordable homes will be built to net zero carbon standards". This should reduce energy poverty and ensure high quality living standards</p>	Comments noted
Reading Borough Council (lpr1490)	<p>RBC and WBDC both continue to recognise the importance of provision of affordable housing in the area. The Western Berkshire Housing Market Area continues to have significant problems of affordability and a substantial need for affordable homes. Delivering as much affordable housing as possible within West Berkshire will help to avoid placing greater pressure on adjoining authorities, including Reading where there are significant existing affordable housing needs.</p> <p>RBC therefore supports WBDC's strong commitment to delivering affordable housing, particularly on sites of fewer than ten dwellings and</p>	<p>Comments noted</p> <p>The evidence of affordable housing needs in the West Berkshire Viability Assessment testing support affordable housing contribution on sites of 5 or more dwellings.</p>

Respondent (with lpr ref)	Response	Council Response
	would further support a requirement for contributions from sites of fewer than five dwellings. RBC's own experience has demonstrated that sites of fewer than five dwellings can indeed make an important contribution to affordable housing. In fact, as illustrated in our Annual Monitoring Report, these sites are most able to regularly meet our requirements for off-site contributions.	
<b>General consultation bodies</b>		
Defence Infrastructure Organisation (lpr2075)	<p>Single Living Accommodation (SLA) &amp; Service Families Accommodation (SFA):</p> <p>In summary, single living accommodation (SLA) is provided to meet operational needs on MOD establishments and is ancillary to its use. Service Families Accommodation (SFA) is provided to meet a specific need, has no commercial value and is subject to national guidance on its location, use and provision of supporting facilities. The close link between military bases and SFA allows for an appropriate support network to be provided to its residents, especially for dependents during times such as overseas deployments.</p> <p>The method for assessing SFA rents is set at a national level and service families pay a subsidised rental charge as set by the Armed Forces Pay Review Board. The Board sets the rates to be charged to service personnel for their accommodation as well as their pay. The SFA rates are set out in Tables 4.1 and 4.2 of the Armed Forces' Pay Review Body Forty-Third Report March 2014. This document is available on the <a href="https://www.gov.uk">www.gov.uk</a> website (see <a href="https://www.gov.uk/government/publications/armed-forces-pay-review-body-43rd-report-2014">https://www.gov.uk/government/publications/armed-forces-pay-review-body-43rd-report-2014</a>). The SFA rental rates are significantly lower than general market housing rental levels in recognition of the special circumstances that apply including the tied nature of the properties and lack of choice. The value of future income streams will not be sufficient to cover the basic build costs and infrastructure procurement and running costs (the latter of which will be significant).</p> <p>It is therefore recognised that SFA directly provided by the MOD should be considered in the same way as affordable housing provided by a Registered Provider. In both instances, there is an element of subsidy, which sets it apart from housing that is either sold or rented, without restriction, through</p>	Comments noted. However, eligibility for mandatory social housing relief from the Community Infrastructure Levy is set nationally by the Government through the Community Infrastructure Levy Regulations 2010 (as amended). Single Living Accommodation and Service Families Accommodation are not currently eligible for mandatory social housing relief from Community Infrastructure Levy under these regulations.



Respondent (with lpr ref)	Response	Council Response
	<p>the open market. Both parties recognise that the SFA to be developed by the MOD will not be a commercial proposition and can only be delivered with substantial amounts of public funding. As such, there is no commercial viability in its provision. It is therefore logical given the considerations discussed within this statement that SFA should have a zero charge for CIL, following the practice that is applied to affordable housing. Such an approach accords with the definitions in the NPPF of affordable housing and essential local workers.</p> <p>Unlike general market housing, the design and specification of SFA developments are subject to national guidance set out in Joint Service Publications (JSPs) (see <a href="https://www.gov.uk/government/publications/jsp-464-tri-service-accommodation-regulations-tsars">https://www.gov.uk/government/publications/jsp-464-tri-service-accommodation-regulations-tsars</a>). This means higher build costs than might normally be expected would be incurred and community infrastructure costs to be met as part of the development for all SFA residents. In accordance with the relevant Scale 25 within JSP 3151 the MOD will provide the following facilities alongside their SFA development:</p> <ul style="list-style-type: none"> <li>(i) Community Centres</li> <li>(ii) Childcare Facilities</li> <li>(iii) Youth Centres</li> <li>(iv) Publicly Funded Welfare Facilities</li> </ul> <p>SFA will not be released onto the open market or use for any other purpose than for SFA without the approval of the planning authority. This will ensure that the SFA 'housing' is developed and managed for its intended purpose, rather than open market housing. Such an obligation would also ensure that if the SFA becomes surplus to MOD requirements and is released in the open market the need to provide for affordable housing would be triggered.</p>	
Newbury Society (lpr1148)	<p>The target is mainly housing for sale, sometimes categorised as “executive homes.” We feel that there is a need for more affordable housing locally, and that council guidelines have not always been followed in major developments. We would draw attention to the “urban village” development in Newbury, where in spite of what is effectively a multi-million-pound subsidy from West Berkshire Council, only 13 of the 232 dwellings (less than six per cent) are categorised as “affordable.” Housing development on the</p>	<p>Comments noted. However, the proposed amended policy sets out an indicative tenure mix for the provision of affordable housing of 70% social rent, 25% First Homes (discounted homes for sale), and 5% shared ownership. Therefore, the target is not mainly homes for sale.</p>

Respondent (with lpr ref)	Response	Council Response
	London Road Industrial Estate (where the land is owned by the council) should include a high proportion of social and affordable housing.	
Reading West Berkshire Labour Party Branch (lpr1178)	<p>With regard to affordable housing we believe it is unlikely that WBC will reach its targets and the needs of the community. We therefore propose that the local plan should include a commitment to initiate house building by the council (WBC) so that future affordable housing, including social housing, needs can be achieved.</p> <p>Changes sought: That the local plan is amended to include a commitment that West Berkshire Council should build affordable houses in order to meet affordable housing targets and community needs.</p>	<p>Comments noted. Delivery of housing in the District to meet local needs is a priority for the Council. The Council has an investment strategy that includes increasing affordable housing delivery. The Council supports the Affordable Housing Programme working with Registered Providers to deliver more than 100 units per year. In addition, the Council has several delivery vehicles including the Joint Venture with Sovereign Housing Association. The Council is also developing a Housing Company to acquire affordable market rent properties.</p>
Home Builders Federation (lpr1951)	<p><i>Contributions on sites not considered to be major development.</i></p> <p>Our first concern is that in amending this policy from that set out in the 2012 Core Strategy the Council has not amended the requirement for developments of between 5 and 9 units to make a contribution to affordable housing provision. The NPPF is very clear at paragraph 63 that “<i>Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas</i>” and as such the Council must remove this requirement.</p> <p>In considering its position it is important that the Council recognise why Government introduced this particular policy. The Ministerial Statement that first set out the policy now adopted in the NPPF was clear that the reason for introducing this policy was to “<i>ease the disproportionate burden of developer contributions on small scale developers</i>”. This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments.</p> <p>These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF (3) shows that over the last 30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by</p>	<p>Comments noted.</p> <p>Under paragraph 64 of the NPPF, 2021 the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).</p> <p>Annex 2 of the NPPF defines <b>Designated rural areas</b> as National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985.</p> <p>74% of West Berkshire is AONB with a large part of the remaining area designated as rural under Section 157 of the Housing Act 1985. The Council is therefore justified in seeking the provision of affordable housing on sites of 5 or more dwellings. This accords with the NPPF.</p> <p>Most of the parishes outside the AONB in West Berkshire are Designated Rural Areas. These are set out in Schedule 1 of Statutory Instrument 1997 No. 625 - The</p>

Respondent (with lpr ref)	Response	Council Response
	<p>about 70% since 1988. The Government is very anxious to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is also, as outlined above the key to long-term supply responsiveness.</p> <p>We recognise the importance of addressing the poor affordability within West Berkshire. However, in addressing the issue of affordability and affordable housing provision we would suggest that the Council are unlikely to address these concerns through affordable housing delivery on smaller sites of between 5 and 9 units. The policy is more likely to reduce the attractiveness of such sites and limit opportunities to SME house builders - the primary objective of this policy.</p> <p><i>Level of contribution</i></p> <p>The viability evidence presented by the Council indicates that viability in some scenarios across the Borough is mixed and sensitive to an increase in the cumulative costs being placed on it through this local plan. In particular we note that scenarios involving previously developed land (PDL) in lower value areas would struggle to meet the policy costs being placed on it by the Council. In some cases, even greenfield scenarios in lower value areas would appear to be unviable or marginally viable at the proposed levels of affordable housing contribution.</p> <p>As such the Council should consider whether greater variation could be included within the policy than is currently being proposed. The Government's approach to planning contributions is to ensure that negotiations on regarding these are significantly reduced. This will, in some cases, require policies to set out a greater variety of contributions that reflect the nature of viability in different locations and on different types of site. For example, the Council differentiate between PDL sites and greenfield sites on the basis that the former is less viable than the later. However, on PDL sites the Council's evidence indicate that such development in lower value areas would be either unviable or on the margins of viability with a 30% affordable housing contribution. We recognise that not all scenarios can be reflected, and as such welcome the ability to negotiate in some circumstances, but in order to reduce the potential for negotiation we would suggest further variation is provided in the policy.</p>	<p>Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997.</p> <p>Furthermore whole plan viability assessment concluded that the requirement for the provision of 20% of affordable housing on small sites of 5-9 dwellings would be viable.</p> <p>National planning guidance on viability states that affordable housing policy requirements should be informed by evidence of affordable housing need and a proportionate assessment of viability; and that affordable housing policy requirements should allow for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage.</p> <p>The proposed policy has been drafted with regard for national planning policy and guidance, and the Affordable Housing Viability study and Whole Plan Viability assessment. Based on this evidence, the requirement set out in the proposed policy is considered to be both appropriate and deliverable. The Council considers that the evidence does not support a variation in the requirement.</p> <p>National guidance also provides scope for applicants to demonstrate whether circumstances justify the need for a viability assessment at the application stage. The proposed policy allows for applicants to justify exceptional circumstances through clear evidence in a viability assessment. This aligns with national guidance and provides sufficient flexibility if needed at the decision making (planning application stage).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>(3) <a href="http://www.hbf.co.uk/?eID=dam_frontend_push&amp;docID=25453&amp;filename=HBF_SME_Report_2017_Web.pdf">ttp://www.hbf.co.uk/?eID=dam_frontend_push&amp;docID=25453&amp;filename=HBF_SME_Report_2017_Web.pdf</a>            Changes sought: Council must remove the requirement for developments of between 5 and 9 units to make a contribution to affordable housing provision.            With regard to level of contribution we would suggest further variation is provided in the policy.</p>	<p>The whole plan viability assessment concludes that the provision of affordable housing on small sites would be viable. In addition, the requirement for small sites in West Berkshire to provide affordable housing contributions is justified because of the specific local circumstances including constraints such as the AONB.</p>
West Berkshire Green Party (lpr1841)	<p>The existing formula for affordable housing has not delivered appropriate levels of low-cost housing, particularly homes for social rent which have been well under 10% of housing completions in recent years. This is probably largely a result of developers reducing the proportion of affordable homes (citing viability). As a result West Berkshire lags behind other local authorities in the provision of social housing. This would be rectified by:</p> <ol style="list-style-type: none"> <li>1) Removing the ability of developers to use “viability” as an argument to reduce affordable homes requirements (viability would be achieved by reducing the price paid for development land).</li> <li>2) Allowing developers to provide comparable alternative sites to achieve the mix required (within reason).</li> <li>3) Using the Sovereign JV and proposed WBC Housing Company to proactively develop affordable homes and homes for social rent to “top up” volume from private developments.</li> <li>4) Setting an annual target of 200 homes for social rent to be achieved by the above methods until the proportion of homes owned and managed by HA and other registered providers reaches the national average of 17.1% (currently 13.4% – draft housing strategy).</li> </ol>	<p>Comments noted</p> <p>The proposed policy has been drafted in accordance with national policy and guidance on viability which was updated in 2018 to address these concerns.</p> <p>The proposed policy as drafted already allows developers to provide affordable housing on an alternative site within the District, in exceptional circumstances.</p> <p>Delivery of housing in the District to meet local needs is a priority for the Council. The Council has an investment strategy that includes increasing affordable housing delivery. The Council supports the Affordable Housing Programme working with Registered Providers to deliver more than 100 units per year. In addition, the Council has a number of delivery vehicles including the Joint Venture with Sovereign Housing Association. The Council is also developing a Housing Company to acquire affordable market rent properties.</p> <p>The proposed policy requires 70% of the total affordable housing provided to be social rent homes. Based on the proposed housing delivery requirement of 8,721 – 9,146 over the plan period and the proposed 30% affordable housing requirement, this could deliver approximately 1,831 – 1921 social rent homes over the plan period.</p>

Respondent (with lpr ref)	Response	Council Response
North Wessex Downs AONB (lpr1628)	<p>The AONB is in need of affordable housing which is not reflected within this policy. Local people are unable to stay local when wishing to buy a property as they are priced out of the market merely because of the designated landscape status. Services centres and villages need affordable homes for younger generations to afford to buy and stay local which ultimately supports local services such as primary schools and local employment areas.</p> <p>Changes sought: The NPPF gives support to the provision of affordable housing in designated rural areas on sites of 5 units or fewer. We would request that this is included, either as on site or off-site provision.</p>	<p>Comments noted. However the viability evidence underpinning the plan suggests that requiring affordable housing on sites of 5 units or fewer would not be deliverable. The rural exception sites policy (DM17) allows for the provision of 100% affordable housing schemes on sites adjacent to rural settlements in the AONB to meet local need.</p>
<b>Other stakeholders</b>		
Martin Vile (lpr16)	<p>The provision of affordable housing within a development (or financial contribution by the developer towards affordable housing elsewhere) should be strengthened. The reliance on financial viability reports to start negotiations with the council for this contribution is flawed and has on at least one occasion meant a tiny fraction of the expected contribution presented at the planning stage. When the planning was refused by the planning committee and the developer appealed this offer was withdrawn on winning the appeal citing the additional costs to the developer in the appeals process.</p> <p>The developers should factor in the expected affordable housing allowance contribution at the initial stages of their development costings and decide if it is a viable development before they apply for planning permission and try and get a reduction in their contribution just to be able to turn a profit at the expense of the affordable housing provision for the county.</p> <p>Poor business decisions should not be bailed out by negotiating and reducing this commitment.</p> <p>The commitment for developers to provide affordable housing within a scheme or offset the relevant amount by financial contribution should be strengthened and not be reduced or negated by negotiation. Just because their own viability reports state that there is insufficient profit in the development, this shouldn't cover poor business decisions when planning a development.</p>	<p>Comments noted. However, the proposed policy has been drafted in accordance with national policy and guidance on viability which was updated in 2018 to address these concerns.</p> <p>Where up-to-date policies have set out the contributions expected from development they should be complied with. It is up to the applicant to demonstrate whether circumstances justify the need for a viability assessment at the application stage which could affect the contribution to be made.</p>

Respondent (with lpr ref)	Response	Council Response
Colin Duff (lpr454)	<p>A greater proportion of affordable housing to buy will encourage low income earners to become property owners.</p> <p>Our daughter is a primary school teacher working for West Berks Council and she cannot afford to buy a property in West Berks on her West Berks salary because demand for affordable housing vastly exceeds supply keeping prices unaffordable.</p>	<p>Comments noted. National policy has recently changed to require a proportion of the affordable housing to be discounted homes for sale 'First Homes'. The tenure mix set out in the proposed policy has been amended accordingly. The Council has also approved a policy position on the sale and purchase of discounted First Homes provided giving priority to applicants with a local connection.</p>
<p>Susan Millington (lpr466)</p> <p>Graham Storey (lpr580)</p>	<p>The existing formula for affordable housing has not delivered appropriate levels of low-cost housing, particularly homes for social rent which have been well under 10% of housing completions in recent years. This is probably largely a result of developers reducing the proportion of affordable homes (citing viability). As a result West Berkshire lags behind other local authorities in the provision of social housing.</p> <p>This would be rectified by:</p> <ol style="list-style-type: none"> <li>1) Removing the ability of developers to use "viability" as an argument to reduce affordable homes requirements (viability would be achieved by reducing the price paid for development land).</li> <li>2) Allowing developers to provide comparable alternative sites to achieve the mix required (within reason).</li> <li>3) Using the Sovereign JV and proposed WBC Housing Company to proactively develop affordable homes and homes for social rent to "top up" volume from private developments.</li> <li>4) Setting an annual target of 200 homes for social rent to be achieved by the above methods until the proportion of homes owned and managed by HA and other registered providers reaches the national average of 17.1% (currently 13.4% – draft housing strategy).</li> </ol>	<p>Comments noted</p> <p>The proposed policy has been drafted in accordance with national policy and guidance on viability which was updated in 2018 to address these concerns.</p> <p>The proposed policy as drafted already allows developers to provide affordable housing on an alternative site within the District, in exceptional circumstances.</p> <p>Delivery of housing in the District to meet local needs is a priority for the Council. The Council has an investment strategy that includes increasing affordable housing delivery. The Council supports the Affordable Housing Programme working with Registered Providers to deliver more than 100 units per year. In addition, the Council has a number of delivery vehicles including the Joint Venture with Sovereign Housing Association. The Council is also developing a Housing Company to acquire affordable market rent properties.</p> <p>The proposed policy requires 70% of the total affordable housing provided to be social rent homes. Based on the proposed housing delivery requirement of 8,721 – 9,146 over the plan period and the proposed 30% affordable housing requirement, this could deliver approximately</p>

Respondent (with lpr ref)	Response	Council Response
		1,831 – 1921 social rent homes over the plan period.
Councillor Tony Vickers (lpr554)	<p>We strongly support this policy. However we are deeply concerned about the efforts of many developers to escape it. We also want to define what “remain affordable” means in the last paragraph.</p> <p>Lack of transparency in the land market and the behaviour of some major national financial and property players is having a hugely dysfunctional effect on the housing market. At the same time, many of those same ‘players’ are benefiting from large increases in profits and asset value while claiming they cannot afford to comply with this policy. The Council must continue to contest this vigorously.</p> <p>We believe “remain affordable” should not just mean that rents continue to be subsidised but that homes for those families of limited financial means must remain affordable to heat and power. This means that “built to net zero carbon standards” must include the lifetime costs of heating and of carbon emissions contributed by the occupation of the home. All new, extended and refurbished homes - especially 'affordable' ones - should be delivered fitted with heating systems that either do not use carbon fuel or can be converted to renewable energy sources.</p> <p>Changes sought: Three:</p> <ol style="list-style-type: none"> <li>1. Insert the words “publicly accessible” before “viability assessment” at the end of the first sentence.</li> <li>2. Insert the words “to live in” after “remain affordable” in the last paragraph.</li> <li>3. Add a new paragraph to the supporting text that captures the point above about remaining affordable.</li> </ol>	<p>Comments noted. The policy will be amended to clarify that affordable housing must remain at an affordable price for future generations of eligible households for as long as it is needed. First Homes must remain affordable in perpetuity.</p> <p>The proposed policy has been drafted in accordance with national policy and guidance on viability which was updated in 2018 to address these concerns.</p> <p>All residential development will be expected to comply with policy SP5 (Responding to Climate Change), and with the minimum standards set out in policy DM4 (Building Sustainable Homes and Businesses). This policy, SP19, is clear that affordable homes must also be built to net zero carbon standards.</p> <p>This is a key part of the approach to viability in planning set out in national policy and guidance and the Council agrees this would be a helpful addition. The proposed policy has been amended by the insertion of the words “publicly available” viability assessment.</p> <p>The definition of affordable housing relates to the cost of purchasing or renting the dwelling, and not the cost of living within it.</p> <p>Reference to affordable housing remaining at an affordable price for future generations of eligible households has been included in the final paragraph of the Policy and explained in more detail in the supporting text.</p>
Paula Saunderson (lpr968)	Not clear enough and needs more facts and figures. How are you going to make up for the existing shortfall in Social Rented housing and ensure you	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	provide decent ground level 2 bed accommodation for the elderly and their carer?	<p>The proposed policy requires 70% of the total affordable housing provided to be social rent homes. Based on the proposed housing delivery requirement of 8,721 – 9,146 over the plan period and the proposed 30% affordable housing requirement, this could deliver approximately 1,831 – 1921 social rent homes over the plan period.</p> <p>Policy DM19 of the Publication Plan now sets out how specialist housing, including for elderly people, will be delivered.</p>
<b>Landowners, site promoters and developers</b>		
Solve Planning Ltd for Emily West (lpr1428)	We support a policy that provides a mix of housing on sites to provide for a mix of housing needs.	Comments noted
Donnington New Homes (lpr1947)	<p><i>Representation in support of continued allocation of Sandleford Park</i></p> <p>The inclusion of Use Class C2 within the definition of Affordable Housing is <u>supported</u>. It should, however, be acknowledged that some C2 uses, such as Extra Care provision, are provided in flatted blocks meaning a larger proportion of this type of affordable units could be provided in a particular phase of a development so that provision of a balanced mix of affordable unit sizes and tenures may not be provided at linear rate across a site. On a site-by-site basis, the delivery of Affordable Housing can be secured through a Section 106 Agreement. As such, it is only necessary for the Policy to acknowledge that this imbalance may occur where Class C2 units form part of the affordable provision.</p>	<p>Comments noted.</p> <p>Policy DM19 (Specialised Housing) deals with Class C2 Specialist Housing. The policy says that affordable units will be appropriately integrated within the development. The supporting text says that affordable housing should be provided as built units on-site as part of well-designed mixed tenure schemes, helping to create mixed inclusive communities. The Council considers that this provides sufficient flexibility to accommodate different development types.</p> <p>Paragraph 9 of the revised Policy SP19 in the Publication Version of the Plan now recognises that provision of affordable extra care or specialist housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to</p>



Respondent (with lpr ref)	Response	Council Response
		demonstrate an appropriate affordable housing contribution.
TOWN for Pincents lane (lpr2131)	<p>Full representation promoting land to East of Pincents Lane, Tilehurst attached. The Updated Housing Needs Evidence (Iceni May 2020) states (p.43) a need for affordable rented housing of 163 net additional homes per year. To this, under the expanded definition of affordable housing in the NPPF can be added 156 affordable home ownership units per annum - a total of 319 dpa. By contrast, delivery of affordable homes in the District in the past five years is set out in Table 5 (of full representation). It can be seen from the figures in Table 5 that the delivery of affordable homes in West Berkshire falls below need in each of the last five years, sometimes markedly so. Control of the supply of affordable homes is not of course target driven, instead it rests on viability assessment. Policy SP19 relies on the Dixon Searle Partnership's Affordable Housing Viability Assessment, July 2020. The proposed policy thresholds and levels seem appropriate for the local housing market. We continue to promote the land east of Pincents Lane at a level of 40% affordable housing. The provision of 106 units (40% of the current application's maximum proposed 265 units) would form a significant contribution to the District-wide annual target. A key mechanism to increase the supply of affordable housing, therefore, is to ensure that sufficient supply of larger sites above the thresholds are allocated and come forward for development. <b>Summary: Support Policy SP19</b>, whilst noting that increased supply of affordable homes is reliant on the allocation of a range of sizes of sites in excess of the threshold for affordable housing provision.</p>	Comments noted
Lichfilelds for North East Thatcham Consortium (lpr2402)	<p>We support the delivery of 40% affordable housing on the NET site as a greenfield development. As indicated in our response to the NET policy, this may vary on a phase by phase basis, particularly in the early construction phases where infrastructure will also need to be provided. On this basis we welcome the inclusion in the policy of lower levels of affordable housing being sought in exceptional circumstances through clear viability evidence, this could be of benefit to certain phases of development, particularly in the early stages of NET delivery or if previously unexpected costs arise. The</p>	Comments noted

Respondent (with lpr ref)	Response	Council Response
	<p>promoters of NET have appointed Turner Morum to undertake an initial review of the local plan viability evidence. Their work concludes that further viability work for the local plan needs to ensure that - as the local plan is finalised and the Infrastructure Delivery Plan (IDP) worked up - there is appropriate consistency of assumptions and testing to cover all potential policy requirements, including for affordable housing.</p> <p><b>Affordable Housing Viability Assessment (background report)</b></p> <p>Turner Morum has undertaken an initial review of the Dixon Searle Partnership's Area Wide Viability Assessment, as well as the David Lock Associates viability modelling in the Thatcham Strategic Growth Study Stage 3 Report: Thatcham Future. From this review we have identified that there will be a need to ensure that - as the local plan is finalised and the IDP worked up - that there is consistency of assumptions and testing across the evidence base.</p> <p>We would welcome the opportunity to work with the council in this exercise by ensuring that the objectives of the local plan policies, including affordable housing delivery, delivery of carbon neutral development (to a specific definition), strategic infrastructure delivery etc. are all aligned to deliver a viable scheme at NET and other schemes across West Berkshire based on the circumstances and requirements of specific sites.</p>	
Tetlow King Planning Ltd for Aster Group (lpr2355)	<p>Tetlow King Planning represents Aster Group, a leading Housing Association in England. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed across the South East region.</p> <p>Aster is a key partner in the delivery and management of new affordable homes in West Berkshire with 60 properties currently under its management in the authority area. Notable recent developments include The Chase at Newbury and Penny Farthing Close, Hungerford, which have both helped to address local housing needs. As significant developers and investors in local people, Aster is well placed to contribute to local plan objectives and act as long-term partners in the community. We therefore welcome the production of the emerging draft of the Local Plan Review 2020 – 2037 and the opportunity to provide comments.</p>	<p>Comments noted</p> <p>The tenure split in the proposed policy has been amended to reflect the requirement to deliver First Homes. The Housing Needs Assessment update, July 2022 confirms that the core need in West Berkshire is for social rented housing and therefore the policy specifies 70% social rent rather than social or affordable rent. As set out in the supporting text, this tenure split is the starting point and the Council may, subject to site specific circumstances, consider an alternative negotiated mix of tenure.</p> <p>The Whole Viability Assessment of the proposed Plan finds that the requirement to build homes to net zero carbon</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Aster supports the objectives of the Council’s emerging affordable housing policy (SP 19) which maintains the same principles of the Core Strategy policy CS6. It is noted that the thresholds are proposed to be adjusted from 15 to 10 dwellings but there is still an expectation that any development of five to nine units should provide at least 20% affordable housing.</p> <p><u>Tenure split</u></p> <p>Policy SP 19 shows that the Council is seeking an affordable housing tenure split of 70% social rented and 30% affordable home ownership on qualifying sites. Observing the findings of the Updated Housing Needs Evidence report (May 2020), paragraphs 9.3 and 9.4 show an annual need for 163 social/affordable rented properties, and a further need for 156 affordable home ownership properties per annum between 2018 and 2036. As policy SP 19 only specifies 70% for social rent instead of the 70% social/affordable rent mentioned in the Updated Housing Needs Evidence report, we query if the wording of policy SP 19 should be amended to reflect the needs of the evidence report. We respect and understand that the Council requires affordable housing that is genuinely affordable to its residents; this perspective is wholly shared by Aster in its role in providing affordable housing for those in need. We therefore accept that the Council may have a preference for social rent where clearly evidenced, although we remind the Council that in order for the Plan to be compliant with the NPPF, the Plan should embrace <i>all</i> types of affordable housing products, including housing for affordable rent. Understanding this, we are pleased to see that the wording of emerging policies SP 19 and indeed SP 18 (Housing type and mix) allow for some flexibility in terms of tenure, with the Council willing to take into account the identified local need for affordable housing and site specifics (including funding and the economics of provision). We welcome this approach of negotiating the tenure mix of affordable housing where needed on individual sites as this will enable the Council to respond flexibly to schemes that come forward to meet local needs which do not comply with the indicative split. This ensures that deliverable development may still come forward to meet locally-specific needs.</p> <p><u>Zero carbon standards</u></p>	<p>standards will not prevent the delivery of affordable housing or render it unviable.</p> <p>Affordable housing should be, and should remain, genuinely affordable. It is therefore important that affordable housing remains as such, for as long as required. This principle has been retained in the policy.</p> <p>Giving communities a greater say and control of their local area is supported by Government policy.</p> <p>The District Council would generally be supportive of community-led affordable housing development. Any scheme should, however, accord with all other policies of the Local Plan in terms of siting, scale design and external appearance. No significant harm should be caused to the character or setting of the settlement and the surrounding countryside. Paragraph 7.73 of the Plan: Housing Type and Mix refers to Council support for the development of housing schemes that are initiated by local Communities. Additional text added at end of supporting text of Policy SP19 to also show specific support for affordable community led housing schemes.</p> <p>The policy does take into account the latest updated Local Housing Need Assessment, July 2022 in relation to tenure split and need for affordable rent.</p> <p>In accordance with national guidance First Homes should remain available in perpetuity and affordable social rent for as long as required.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Policy SP 19 requires all new affordable homes to be built to net zero carbon standards. While we are pleased to see that West Berkshire has a strong agenda in promoting zero carbon development in line with section 14 of the NPPF, there are concerns regarding the costs for housing associations to implement this policy across their upcoming sites. We appreciate that cheaper and more efficient technologies have become available in recent years, nonetheless robust viability testing should be carried out to ensure that applicants can continue to be able to deliver affordable housing schemes with such demands. Such a policy should ensure that while schemes are future proofed, this should not prejudice the delivery of affordable housing which remains one of the most critical priorities for the Council.</p> <p><u>Retaining affordable housing in perpetuity</u> At the bottom of Policy SP 19, the emerging local plan states that the Council will expect affordable units to remain affordable so as to meet the needs of both current and future occupiers. The sole reference to retaining affordable housing in perpetuity is in Annex 2 of the NPPF where this is sought for affordable housing delivered on rural exception sites. This principle is appropriate and supported by our Members as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. Securing affordable housing in perpetuity more widely is not supported for a number of reasons, foremost of which is that it restricts lenders appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. We therefore ask that the Council remove any references to retaining affordable housing in perpetuity in the local plan unless explicitly referring to rural exception sites.</p> <p><b>Community Land Trusts</b> Although Aster does not currently have any Community Land Trust (CLT) partners in the area, it may look to in future and a general indication of support from the local authority in the Local Plan would be helpful. CLTs have a proven track record of success in delivering affordable housing for</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>local people, particularly in rural areas. By January 2021 Aster will have delivered 14 CLT partnership schemes totalling 150 affordable homes. Therefore, it would be particularly useful if the Local Plan included a commitment to support CLTs in their choice of site. A commitment to good practice in respect of allowing CLTs flexibility on affordability criteria and local allocations would also be helpful.</p> <p>Changes sought: Query if the wording of policy SP 19 should be amended to reflect the needs of the evidence report with regard to tenure split. The Plan should embrace <i>all</i> types of affordable housing products, including housing for affordable rent. We ask that the Council remove any references to retaining affordable housing in perpetuity in the local plan unless explicitly referring to rural exception sites.</p>	
Sovereign Housing Association (lpr2163)	<p>SHA broadly support the wording of the policy SP19. We are still working through the detail of the new Shared Ownership model. Once we know more about a new lease from April 2021, we'll need to work with you to deliver this new protocol. A proportion of SHA's shared ownership home buyers are downsizers. More reference could be given to seeking opportunities to create more shared ownership opportunities for older people – to help free-up under-occupied local homes. Especially where new schemes might be affordable to older people seen as being asset rich but income poor. Where the Council expects units to remain affordable - is this suggesting the implementation of a DPA and threshold on the equity that can be purchased? If so, we would want to discuss this in greater detail as this is likely to have an impact on demand and the viability of a site.</p> <p>It's very welcome that the draft strategy recognises the need to make new homes future-proof. Might that extend to promoting lifetime homes, or incentivising low carbon homes? For planning purposes a timescale would need to be considered regarding the implementation of net zero carbon standards, and what infrastructure the Local Authority would be supporting</p>	<p>Comments noted</p> <p>In relation to extra care housing the policy will be implemented on a case-by-case basis, and the individual viability assessment will be used to demonstrate an appropriate affordable housing contribution. This should provide more opportunities for affordable housing options for older people.</p> <p>Proposed policy DM19 (Specialised Housing) sets out in more detail how specialised housing for older people will be delivered</p> <p>The Council understands that buyers who purchase shared ownership housing have the option to 'staircase out'. In other words, to purchase additional equity until they own the property outright. This is an affordable route to home ownership. The Council's expectation is that the rent and price paid for these properties is affordable. Furthermore,</p>

Respondent (with lpr ref)	Response	Council Response
	<p>to achieve this. For example - does the local electricity structure support numerous car charging points? What is West Berks vision for electric car charging points - is there a % that you would want to see on new build sites?</p>	<p>the expectation is that over the lifetime of the plan, additional shared ownership properties will come forward as part of the housing delivery pipeline to replace those that have been 'staircased'. This will ensure that there continues to be an affordable home ownership product available for those who need it within the District.</p> <p>The draft Plan requires housing to meet net zero carbon standards. All residential development will be expected to comply with Policy SP5 (Climate Change) and with the minimum standards set out in Policy DM4 (Building Sustainable Homes &amp; Businesses). This policy, SP19, is clear that affordable homes must be built to net zero carbon standards.</p>
Lochailort Newbury Ltd (lpr2040)	<p>The draft policy as worded contains a number of barriers to delivery which could individually or cumulatively render an otherwise deliverable scheme unviable. Consequently, the draft policy should be amended as follows:</p> <p>1. Build to Rent Build to rent is a distinct asset class within the private rented sector and has been defined in the National Planning Policy Framework glossary, in order to simplify its treatment within the planning system. Affordable housing must be considered completely differently in Build to Rent schemes compared with other tenures, and it is the Government's very clear policy that affordable housing in the manner defined in draft Policy SP19 is neither appropriate nor required in Build to Rent developments (Planning Practice Guidance Paragraph: 002 Reference ID: 60-002-20180913)</p> <p>2. Use Class C2 developments and extra-care housing Whilst it is the case that Local Plans have the legal ability to set out different policy requirements for different types of development, these policy requirements must be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies and local and national standards, including the</p>	<p>Comments noted.</p> <p>There is no blanket national exemption for build to rent schemes from the requirement to provide affordable housing. However, the Council does recognise that national planning guidance is clear that for build to rent schemes, the provision of affordable housing should be in the form of affordable private rent which is discounted relative to local market rents. The policy has been amended to reflect this approach.</p> <p>Noted - In relation to extra care housing, it is recognised that provision of affordable housing may be particularly difficult to achieve. In such circumstances, the policy will be implemented on a case-by-case basis, and individual viability assessment will be used to demonstrate an appropriate affordable housing contribution. The Policy has been amended to reflect this.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>cost implications of Community Infrastructure Levy and section 106. There is insufficient evidence to demonstrate that requiring affordable housing within C2 developments in West Berkshire will not affect their viability.</p> <p>Changes sought: Draft Policy SP19 should be amended to specifically confirm in terms that it does not apply to Build to Rent schemes. Lochailort would welcome a meeting with the Local Planning Authority to discuss appropriate policy wording of an additional and specific Build to Rent policy, mindful that particularly within mixed-use schemes the wider public benefits of a development must be considered in the planning balance and are likely to include matters which outweigh the provision of affordable housing on a specific site.</p> <p>The following text should therefore be deleted from draft Policy SP19: “This policy is not restricted to development which falls within Use Class C3 but applies to all forms of self-contained residential development including C2 uses such as extra care housing.”</p>	<p>Text deleted to reflect the different circumstances which may apply to the provision of affordable housing on proposed extra care housing schemes.</p>
Audley Court Ltd. (lpr2208)	<p>Audley is an experienced and well-respected developer, owner and operator of private residential care communities around the UK. Audley developed its first village in 1998 and has since built a portfolio of 18 residential care communities (15 operational and three under construction) representing over 2,000 units of accommodation, with a GDV of almost £1 billion. Each Audley scheme falls within Use Class C2 by virtue of the high level of care that is made available and delivered, together with specially designed accommodation and communal facilities. It is within this context that Audley has an interest in the current consultation.</p> <p>The number of older people in the UK is set to grow dramatically over the coming years as people are living longer. It is estimated that 11.8 million people aged over 65 currently live in the UK; the number of people aged over 75 is projected to double in the next 30 years; and the number of people over 85 (those likely to be needing the highest level of care) is projected to grow faster than any other age group - by 2037 there are projected to be 1.42 million more such households in England. ‘The top of the ladder’, report prepared by Demos (2013), the leading cross-party think tank, examined the issue of freeing up under-occupied family sized homes in</p>	<p>Comments noted.</p> <p>Policy has been amended to acknowledge the different circumstances relating to affordable housing provision on proposed C2 residential care developments and their specific operational characteristics. The policy will be implemented on a case-by-case basis, and individual viability assessment will be used to determine an appropriate affordable housing contribution.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>significant detail. The key issues and findings raised as part of this research states:</p> <p><i>“Retirement properties make up just 2 per cent of the UK housing stock, or 533,000 homes, with just over 100,000 to buy. One in four (25 per cent) over 60s would be interested in buying a retirement property – equating to 3.5 million people nationally.”</i></p> <p>In addressing this issue, MHCLG issued updated Planning Policy Guidance in June 2019 to support Councils in preparing planning policies on housing for older and disabled people. The Guidance states simply that <i>“The need to provide housing for older people is critical...Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.”</i></p> <p>As people age, there is a tendency to under-occupy larger family homes (due to bereavement and as children leave). The development of specialist accommodation for older people allows people of retirement age to downsize from larger under-occupied family homes, which are then freed up to the housing market. In turn, the release of larger family homes cascades through the housing ladder freeing up smaller homes for first time buyers and improving affordability.</p> <p>As such, the development of Class C2 residential care communities benefits the local housing market through the delivery of specialist housing to meet for older people and through the release of family housing, and then smaller homes. Such developments deliver a wide range of other social and economic benefits, including: creation of direct and indirect jobs, reducing healthcare costs and the demands placed on local NHS services, and integrating care and support facilities into the local community. These benefits should be addressed in the planning balance when considering any requirement for affordable housing.</p> <p>Specialist accommodation for older people, falling within Use Class C2, operates in a fundamentally different manner to conventional market housing developments falling with Use Class C3 provided by traditional housebuilders. Audley’s residential care communities provide extensive care and communal facilities that are specifically targeted to meet the needs of</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>their residents. The cost of providing these care and communal facilities reduces the GDV of such developments (when compared with traditional forms of housing), which in turn has an impact of the viability of delivering affordable housing (whether on site or through contributions). Accordingly, it is essential that any policies relating to the delivery of affordable housing consider the unique operational model and viability of Class C2 residential care communities.</p> <p>Draft Policy DC18 relates to the provision of specialised housing and makes clear that there is a presumption in favour of new housing designed to meet the needs of those with identified support of care needs, where certain criteria are met. Although this approach is welcomed in principle, the mechanics for the delivery of specialist accommodation will rely very much upon policies geared towards the delivery of conventional C3 housing developments, and which fail to take into account the unique operating models and viability implications associated with specialist accommodation for older people. This is particularly the case with draft Policy SP19 which relates to the delivery of affordable housing and which states specifically that the Policy will apply to all forms of self-contained residential development including C2 uses such as extra care housing.</p> <p>This is a significant change in approach for West Berkshire where previously Audley has been advised that C2 developments would not attract contributions for affordable housing. This new approach is very concerning not least because it seems the change has been made without the benefit of evidence or viability testing – the Affordable Housing Viability Study (Dixon Searle Partnership, October 2019) appears to make no reference to C2 uses or specialist accommodation for the elderly.</p> <p>Audley is concerned that application of affordable housing policies, assessed for viability purposes against conventional Use Class C3 developments, to Class C2 uses will severely prejudice the delivery of specialist accommodation for older people, and place operators such as Audley at a significant disadvantage when compared with traditional housebuilders in terms of their ability to acquire new sites and deliver much needed accommodation and care for older people. There is significant</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>tension between this approach and the supposed ‘presumption in favour’ referred to in Draft Policy DC18.</p> <p>Changes sought:</p> <p>The need for additional specialist accommodation for older people is critical and the viability, and therefore delivery, of this form of development would be seriously prejudiced by an automatic requirement to deliver affordable housing on a level that is the same as a traditional C3 residential development – whether on site or through a commuted sum.</p> <p>Accordingly, we would request that the Council undertakes viability work to provide evidence to support its proposed policy stance, and that draft Policy SP19 be amended to acknowledge the unique operational models associated with C2 residential care community developments and to ensure that such uses be assessed on their own merits, having regard to their specific operational characteristics.</p> <p>We would welcome the opportunity to discuss the issues raised in these representations in more detail with the Council. In this context, we would be happy to provide more detail to explain how Class C2 residential care communities differ from traditional Class C3 housing (for example in terms of GDV and the operational model and costs) and to demonstrate the social and economic benefits that can be secured.</p>	
Rectory Homes (lpr1850)	<p>The Policy does not accord with paragraph 63 of the NPPF which directs that affordable housing should not be sought on schemes of less than 10 dwellings if located outside of the designated rural areas. As such, Policy SP19 needs to be amended to accord with national planning policy.</p> <p>Instead, to deliver affordable housing in smaller settlements such as service villages, as per our representations above, any reference to ‘minor development’ should be removed from strategic housing policies. This will enable affordable housing to be secured in smaller settlements in line with the NPPF but will also not deter much smaller schemes of less than 10 units from being delivered which otherwise would have to deliver a proportion of affordable housing</p>	<p>Comments noted.</p> <p>Under paragraph 64 of the NPPF, 2021 the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).</p> <p>Annex 2 of the NPPF defines <b>Designated rural areas as</b> National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985.</p> <p>74% of West Berkshire is AONB with a large part of the remaining area designated as rural under Section 157 of</p>

Respondent (with lpr ref)	Response	Council Response
		<p>the Housing Act 1985. The Council is therefore justified in seeking the provision of affordable housing on sites of 5 or more dwellings. This accords with the NPPF.</p> <p>Most of the parishes outside the AONB in West Berkshire are Designated Rural Areas. These are set out in Schedule 1 of Statutory Instrument 1997 No. 625 - The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997.</p> <p>Also, the whole plan viability assessment concludes that the provision of affordable housing on small sites of between 5 and 9 dwellings would be viable.</p>
Feltham Properties (lpr2282)	<p>Emerging Policy SP19 and supporting text needs to be clear in whether affordable housing is required for development involving Use Class C2 (i.e. care/nursing homes). It is our view, shared with the development industry, that C2 uses should not attract the need to provide affordable housing as they are significantly different uses. This would provide clarity and confidence moving forward to support their delivery to meet the significant need in accordance with our comments above.</p>	<p>Comments noted. Policy has been amended to acknowledge the different circumstances relating to affordable housing provision on proposed C2 residential care developments and their specific operational characteristics. The policy will be implemented on a case-by-case basis, and individual viability assessment will be used to determine an appropriate affordable housing contribution.</p>
Bluestone Planning for Darcliffe Homes (lpr2430)	<p>There are several concerns with this policy as drafted, all of which would tend to punitively affect small site developers disproportionately when compared to larger site developers:</p> <ol style="list-style-type: none"> <li>1. The most punitive rate of provision (minimum 40%) has been applied to greenfield sites of 10 or more dwellings or 0.5 hectares and over. This is a change from the previously adopted 15 dwellings or more.</li> <li>2. Furthermore, the emerging draft policy requires on development sites of between five and nine dwellings, 20% provision of affordable housing. There is no clarification as to whether this applies to sites within the AONB or the District as a whole.</li> </ol>	<p>Comments noted. However, the whole plan viability assessment concludes that the provision 40% affordable housing on sites of 10 or more dwellings would be viable. This also accords with national policy.</p> <p>Considering the high affordability ratio in the District the requirement for small sites (5-9 dwellings) in West Berkshire to provide affordable housing contributions is justified because of the specific local circumstances including:</p> <ul style="list-style-type: none"> <li>• constraints such as the AONB;</li> <li>• the existence of designated rural areas; and</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>The NPPF paragraph 63 clearly states: <i>“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”</i></p> <p>The District of West Berkshire outside of the AONB is not a designated rural area (National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985) and there is no other justification provided in the Updated Housing Need Evidence report (May 2020) therefore this is considered to be contrary to the requirements of the NPPF.</p> <p>Minor developments and smaller developments of between 10-20 dwellings can provide a valuable source of small sites which can be delivered quickly and which will help to keep the local housing market buoyant. This approach will disincentivise smaller developers from bringing these kinds of sites forward which is clearly contrary to the spirit of the NPPF, and in particular paragraphs 67, 68 and 78.</p> <p>Changes sought: The more logical and sensible approach (especially given the need not to make small sites unviable – a problem that is well-known where lower affordable housing thresholds are introduced) would be to raise the affordable requirement slightly on the larger sites where viability is more robust and provide a sliding scale of percentage requirements as site sizes and numbers reduce.</p>	<ul style="list-style-type: none"> <li>the stable historic completion figures for small windfall sites.</li> </ul> <p>The requirement applies to all proposed housing sites within the District.</p> <p>The areas set out under section 157 of the Housing Act 1985 are National Parks, Areas of Outstanding Natural Beauty and areas designated as rural for the purposes of Right to Buy by the Secretary of State.</p> <p>The criteria for rural designation are that the population density is 2 persons or fewer per hectare; and that there are no more than 3,000 inhabitants. Areas are designated at the request of individual local authorities; and can be made at any time.</p> <p>Most of the parishes outside the AONB in West Berkshire are Designated Rural Areas. These are set out in Schedule 1 of Statutory Instrument 1997 No. 625 - The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: SP20 Strategic approach to economic development and hierarchy of centres****(Proposed Submission LPR Policy: SP20 Strategic approach to employment land)**

Number of responses received: 35

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Stratfield Mortimer Parish Council (lpr405)	<p>Policy is supported.</p> <p>We support this in general but have the following comment: Clearly the plan has to take into account the various edicts of the ONR. However, in para 4.46 the statement is made that “It is not therefore practical to express the ONR’s likely advice, or the Council’s response, in any further policy in this Plan” While the sentiment is understandable, not to construct a range of scenarios covering likely possible futures resulting from ONR’s advice seems to abdicate all responsibility and to a certain extent make the local plan worthless for those areas likely to be subject to such advice.</p> <p>Changes to be made/preferred approach: To construct scenarios of likely ONR advice and the way these would be handled, as part of the local plan, should they come to pass.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Please see the Council’s response to representation lpr393 made under Emerging Draft LPR Policy SP4.</p>
Hungerford Town Council (lpr139)	<p>Policy is supported.</p> <p>Charnham Park, Smitham Bridge Rd Industrial Estate and the Hungerford Station areas are recognised as DEAs.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p>

Respondent (with lpr ref)	Response	Council Response
Shaw cum Donnington Parish Council (lpr214)	<p>Policy is supported.</p> <p>Response from Shaw-cum-Donnington Parish Council on Local Plan Consultation</p> <p>7 Fostering economic growth. We are concerned at the converting of modern office blocks on industrial estates to residential use. This undermines having areas for housing and industrial/office and is a back door way of achieving housing in inappropriate areas.</p> <p>SP20 Strategic approach to economic development and housing. We do not feel competent to comment.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that where necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>
Greenham Parish Council (lpr905)	<p>Policy is not supported.</p> <p>Covid 19 effects have not been taken into account in the policy, add text from document provided by TV</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p>
Wokingham Borough Council (lpr1479)	<p><i>Wokingham Borough Council's full representation is attached</i></p> <p>WBDC's employment evidence identifies a need for 65,000sqm of office floorspace and 62,000sqm industrial, storage and distribution floorspace in the period 2020 – 2036. Policy SP 20 details the strategic approach to economic development and sets out that these figures will be met in full over the plan period. This will be met through a combination of protecting these uses at existing Designated Employment Areas (DEAs); expanding existing and</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. This work also extends the plan period to 2039. The update to the ELR</p>

Respondent (with lpr ref)	Response	Council Response
	<p>creating new DEAs; and redevelopment (for office floorspace) in Newbury town centre and other town and district centres within the hierarchy.</p> <p>It is noted that the plan period covers an additional year (to 2037) compared to the economic evidence. It is therefore unclear how or whether this additional year's need is taken into account in this strategic approach.</p> <p>The Plan contains site specific policies for each proposed allocation which provide further quantitative detail for how the strategic employment needs stated in SP 20 will be met. Policies EMP1-5 propose extensions to existing DEAs to provide a total of 75,700sqm of industrial storage and distribution floorspace. Therefore, even accounting for an additional year's worth of need, the Plan appears to overprovide against this aspect of need.</p> <p>As regards specific policies for office floorspace development, EMP6 provides for 20,000sqm 'employment floorspace' at Arlington Business Park and Policy SP 20 further supports new office development with a primary focus on Newbury Town Centre. However, there is no specific evidence provided that sites in Newbury are deliverable or any indication given of the quantity of floorspace that could be accommodated. Therefore, it is unclear at this stage exactly how identified needs for office space will be met.</p> <p>It is recommended that WBC requests clarification on how the additional years' worth of employment need is to be addressed. As regards office floorspace, WBC would welcome additional clarity on how this need will be met as the plan making process progresses.</p>	<p>will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>Text within, and supporting, the Emerging Draft LPR policy will be amended to make clear how the LPR will seek to address the requirements for employment land over the plan period. The LPR will make provision for industrial land through site allocations, to assist in accommodating the forecasted industrial requirements to 2039. However, given the current weakened office market and a lack of suitable available sites there remains a shortfall in supply of both office and industrial space. The Council has positively sought opportunities to meet the identified need and will commit to reviewing the matter again at the first 5 year review.</p>
Tilehurst Parish Council (lpr1986)	<p><i>Full representation from Tilehurst Parish Council and Tilehurst Neighbourhood Development Plan Steering Group is attached.</i></p> <p>It is vital that the Local Plan foster economic growth and support local communities, particularly as we emerge from the Covid-19 pandemic, so it is good to see policies aimed at addressing these needs. We are looking at the possibility of enhancing these policies locally with our NDP.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p>

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2255)	<p>Policy not supported.</p> <p>There is no reference to the impact of Covid-19. All evidence pre-dates the pandemic. Whilst the implications for strategic spatial planning are not yet clear, evidence is mounting that casts doubt on the need for new office floor space and indicates that much employment will be largely home-based. In particular, the concept of the “15-minute neighbourhood” is gaining support within the planning profession.</p> <p>Changes to be made/preferred approach: To be discussed. None at this time.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p>
Thatcham Town Council (lpr1404)	<p>It is unclear to us how the small-scale employment as defined in SP 17 for the strategic site of Thatcham NE fits into the hierarchy.</p> <p>It is also unclear as to where the priority location is for warehouse facilities and logistics. In the economic development assessment, it was identified that agents would seek locations close to the A34/M4 junctions and in the labour assessment it was acknowledged that this is a growth area accounting for 40% of labour demand.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>The ELR outlines that the industrial market across the whole of West Berkshire is performing well, with low vacancy and a tight supply for smaller units (up to 5,000sqm) which sees the most take up activity. Whilst there is demand for larger B8 distribution and logistics this tends to be at the motorway junctions, particularly at Theale. Occupiers across all building sizes range from local to national businesses and covering a wide variety of business activity with no specific sector driving demand. The Covid19 pandemic has strengthened the industrial market further, with strong demand resulting in an increasingly constrained market.</p>
Lambourn Neighbourhood Development Steering Group (lpr1706)	<p>SP20 refers to the shortage of industrial, storage and distribution floorspace, for Classes B2 and B8. New DEAs are proposed to provide that floorspace. SP21 says Class E use will be permitted in new DEAs. This would include E(g) uses, formerly covered by the now-revoked B1 class. DC31 mentions “business uses” without specifying Class of use, unlike Policy CS9 in the previous Local Plan, which specified B Class uses for the (then) PEAs.</p>	<p>Comments noted.</p> <p>Text within Emerging Draft LPR Policy SP20 and Emerging Draft LPR Policy DM31 will be amended to provide clarity on permissible uses.</p>



Respondent (with lpr ref)	Response	Council Response
	We are concerned that this lack of clarity will lead to any policy concerning the DEA in the emerging Lambourn NDP being judged to not conform to the Local Plan 2020-2037.	
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr81)	<p>Policy is supported.</p> <p>Changes to be made/preferred approach: Given the current situation, it can be argued that a major increase in office space may not be the best use of the area, given the move towards home working we have seen created by the pandemic. We don't think this is going to reverse any time in the near future.</p> <p>We imagine that you intend to expand this policy with further detail. Where are the DEA's to be located in Newbury? Given that office space is being lost through PDR's and home working, an audit should be given of space expected to be lost and new office space required. Will the new DEA's complicate achievement of the planned targets for new housing?</p> <p>It may be implied, but is not stated, that DEA's will afford protection against conversion of premises to housing under PDR's. Is that correct? If so, it will be a great relief.</p> <p>7.3/7.4 See SP20.</p> <p>7.8 Community uses should include meeting venues for voluntary bodies, such as was provided by Greenham Arts before it was redeveloped. There is a currently a lack of these, which are largely limited to church halls, and will be needed again after Covid problems are overcome.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office market has slowed there remains a forecasted demand for office space over the plan period.</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that where necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p> <p>Emerging Draft LPR Policy DM39 addresses the provision and retention of local community facilities.</p>

Respondent (with lpr ref)	Response	Council Response
Theatres Trust (lpr1002)	<p>Policy is supported.</p> <p>The Trust welcomes this policy's support for cultural uses within town centres. These facilities help enhance the vitality of town centres and support and encourage other businesses, which is becoming increasingly important as the retail market comes under increasing change and challenge.</p> <p>We also welcome the Council's support for retention of facilities expressed through supporting paragraph 7.9 which reflects paragraph 92 of the NPPF.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 will be split to separate the town centre elements of this policy into a standalone policy relating to town centres.</p> <p>Proposed Submission Draft LPR Policy DM39 addresses the provision and retention of local community facilities.</p>
Sovereign House Association Ltd (lpr2164)	<p>SHA welcome the reference within SP20 to supporting other uses within DEAs and the Town Centre where the vitality and viability of the existing centre is maintained and where possible enhanced. As mentioned in response to the Council's Visions and Objectives, the global pandemic will have a lasting impact on our towns and cities and will require innovation and flexibility to ensure they remain viable and pleasant places. This may provide opportunities to provide a more varied mix of uses where people do not only shop but live, socialise and experience culture. As a key stakeholder SHA are aware the Council are preparing a Newbury Town Centre masterplan and would welcome engagement through its evolution.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 will be split to separate the town centre elements of this policy into a standalone policy relating to town centres.</p>
West Berkshire Green Party (lpr1842)	<p>The requirement for office space appears too high and should be reduced as office demand is falling as businesses adapt post-Covid. It is also contradictory to say part of the demand increase is due to permitted developments, as the re-purposing of offices would indicate reduced demand (otherwise why convert them?).</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office</p>

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		<p>market has slowed there remains a forecasted demand for office space over the plan period.</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that where necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr300)	<p>Policy not supported.</p> <p>We have concerns regarding the extension of DEAs (previously PEAs) at Membury, into the AONB. Traffic along this road is already heavy and the roads narrow.</p> <p>Changes to be made/preferred approach: Not to develop beyond brownfield sites at Membury and to manage existing businesses better.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites. Business development in the countryside is addressed under Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy – which considers economic development, including office, industry, storage and distribution, in the countryside.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
Susan Millington (lpr467)	<p>Policy not supported.</p> <p>The requirement for office space appears too high and should be reduced as office demand is falling as businesses adapt post-Covid. It is also contradictory to say part of the demand increase is due to permitted developments as the re-purposing of offices would indicated reduced demand (otherwise why convert?).</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office market has slowed there remains a forecasted demand for office space over the plan period.</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that where necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>
Councillor Tony Vickers (lpr555)	<p>Policy not supported.</p> <p>We do not accept the evidence base as being sufficiently reliable as a guide to new employment land or floor space requirements. There is no reference to the impact of Covid-19.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>All evidence pre-dates the pandemic. The Covid-19 pandemic and resulting increase in home-working means that demand for new office space is likely to be significantly reduced over the Plan Period.</p> <p>There is already a significant amount of unlet office space in the Eastern Area. Reading International Business Park, only 2km from the district boundary, is 48% unlet. Office developments in Theale should be limited to the existing employment sites and business park.</p> <p>The specific proposal to allocate a site for 20,000 sqm of office space in Theale (ref EMP6) is unacceptable because:</p> <p>It would adversely affect the setting of Theale as viewed from the A4, M4 J12 and M4 motorway.</p> <p>The office built form and car parking would significantly reduce, if not eliminate, the gap between the settlements of Theale and Calcot, contrary to policy.</p> <p>The site would be largely covered in built form and car parking, leaving little or no space for soft landscaping or SUDS drainage.</p> <p>The site is in flood zone 2 and regularly suffers from surface water and groundwater flooding. This means that infiltration SUDS measures would not be possible.</p> <p>Would generate an additional approx 800 vehicle movements* in peak periods. This would contend with traffic to or from Theale High Street at its junction with Hoad Way. It would also contend with traffic arriving or departing the Arlington Business Park and employment areas to the south of Theale at the A4/Hoad Way/Waterside Drive roundabout in the peak periods. This would cause a significant problem for traffic leaving Waterside in the evening peak that is already subject to a two minute delay (historical traffic data for 1-4 April 2019). It would also add to existing congestion at M4 J12.</p>	<p>ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office market has slowed there remains a forecasted demand for office space over the plan period.</p> <p>With regards to the proposed allocation for office space at Theale (EMP6) this site will be removed from the LPR. Following the Regulation 18 consultation further landscape evidence has been undertaken on a number of sites to inform the LPR. The Landscape Sensitivity and Capacity Assessment for this site outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale’s historic character and setting. The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA – to be renamed through the LPR to Designated Employment Areas (DEA) by the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the</p>

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	<p>* Calculated using Bracknell Forest Council's parking standard for offices of one space per 25 sq. m. of office space.</p> <p>The proposal to allocate 20,000 sq m of new office space (EMP6) should be removed from the plan.</p> <p>Whilst the implications for strategic spatial planning are not yet clear, evidence is mounting that casts doubt on the need for new office floor space and indicates that much more employment will be largely home-based. In particular, the concept of the “<a href="#">15-minute neighbourhood</a>” is gaining support within the planning profession. Where employment of ‘office workers’ becomes more home- or local-hub-based, we wish to see this concept adopted: all routine facilities should be planned to be within a 15-minute journey time from home, where possible on foot or by bike.</p> <p>We accept that PD conversions have meant a significant notional loss of employment land in and near town centres – especially Newbury – but the fact that take-up by housing developers and occupation of those former offices has often not taken place after several years means that this land may return to office or other town centre uses and not be lost for the whole Plan Period. We do not wish to see valuable potential housing land mothballed for offices that may not be needed. We accept that new modern office space is needed but not that means there needs to be more land provided for it.</p> <p>In the post-Covid environment, it must be recognised that there will be a need for small business hubs within what are primarily residential areas, so that home-workers’ social, networking and other business support face-to-face and practical needs can be met. Such facilities may be covered by Class F but if not they should be exempt the sequential test.</p>	<p>perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The landscape assessment concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses, and as such it is no longer proposed to allocate the site within the LPR.</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that were necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Changes to be made/preferred approach: While the words in the policy might remain unchanged, we do not accept a figure as high as 62,000 sqm of office floorspace.</p> <p>In the supporting text, we feel the wording of 7.10 is too restrictive of possible Class E/F business related facilities. This could discourage 'climate friendly' proposals to incorporate such facilities within multi-purpose community / local centres.</p>	
Jane Halliday (lpr626)	<p>Policy not supported.</p> <p>The requirement for office space appears too high and should be reduced as office demand is falling as businesses adapt post-Covid. There is also a clear contradiction in saying that part of the demand increase is due to permitted developments since the re-purposing of offices would indicate the opposite i.e. reduced demand (which is why they are being converted in the first place).</p> <p>Changes to be made/preferred approach: Review the need to build new offices when it appears that there is decreasing or insufficient demand for the existing offices in the region.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office market has slowed there remains a forecasted demand for office space over the plan period.</p>
Ian Halliday (lpr627)	<p>Policy not supported.</p> <p>The requirement for office space appears too high and should be reduced as office demand is falling as businesses adapt post-Covid. There is also a clear contradiction in saying that part of the demand increase is due to permitted developments since the re-purposing of offices would indicate the opposite i.e. reduced demand (which is why they are being converted in the first place).</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Changes to be made/preferred approach: Review the need to build new offices when it appears that there is decreasing or insufficient demand for the existing offices in the region.</p>	<p>ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office market has slowed there remains a forecasted demand for office space over the plan period.</p>
Graham Storey (lpr583)	<p>Policy not supported.</p> <p>The requirement for office space appears too high as office demand is falling as businesses adapt post-Covid. It is also contradictory to say part of the demand increase is due to permitted developments as the re-purposing of offices would indicated reduced demand (otherwise why convert?).</p> <p>Changes to be made/preferred approach: Reduce the planned office space and reprioritise for the development of housing. For instance the old Quantel Office off Kiln Road is likley to become vacant and will provide space for a medium size development.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR is a long term strategy to 2039 and the conclusions from the updated employment land evidence (ELR 2022) indicate that although the office market has slowed there remains a forecasted demand for office space over the plan period.</p>
Tim Hall (lpr653)	<p>Policy not supported.</p> <p>As mentioned elsewhere.</p> <p>Changes to be made/preferred approach: Fresh research and thinking is needed on the evolution of employment trends following Covid-19 (e.g. home working, etc.) which I suspect have not been reflected in the analysis.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p>



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David Hill (lpr717)	<p>Policy not supported.</p> <p>The centralisation policies of this approach drain the sustainability out of rural areas. Whilst clearly the significant proportion of employment use will be in more urban areas, proportional development must be permitted in more rural communities.</p> <p>Changes to be made/preferred approach: Sympthetic small-scale employment development should be permitted where there is a proven demand. Reliance on car transport to move to central areas must end.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites.</p> <p>There are a number of Designated Employment Areas (DEAs) within the rural areas of the District and these locations are specifically designated for business use – see Proposed Submission LPR Policy DM32.</p> <p>In addition, Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy recognises that many rural areas host a large number of small and medium sized enterprises which are vital to providing local job opportunities and a diverse economy. The policy therefore seeks to support appropriate new or expanding businesses in the countryside, supporting sustainable economic growth within the rural areas without detriment to the environment.</p>
Pro Vision on behalf of Sir Richard Sutton Limited (lpr2087)	<p>Full representation attached, in relation to site at A34/A4 Junction, Speen, Newbury</p> <p>Specifically, this Representation is made in relation to our client's land adjoining the A43/A4 Junction at Speen Newbury (the Site). The Site is identified as SPE1 in the Council's HELAA (see attached).</p> <p><u>The Need for Employment Land</u></p> <p>As part of the dLPR's evidence base, The West Berkshire District Council Employment Land Review was undertaken by Stantec with Aspinall Verdi in</p>	<p>Comments noted.</p> <p>Text within, and supporting, the Emerging Draft LPR policy will be amended to make clear how through the LPR, the Council will seek to facilitate the growth and forecasted change of business development over the plan period.</p> <p>With regards to offices, very few sites were promoted to the Council for office development and this is not surprising given the limited viability in the market at present. The Council's evidence confirms that the</p>

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	<p>August 2020. Its conclusions, summarised in the table below, are unequivocal; the Local Plan Review should, as a minimum, make provision for 65,000 sqm of new office (now Class E) floorspace in the plan period. (see <i>table in attached</i>)</p> <p>The Council were advised that “some of this provision could come forward through office provision at Theale. <b>However, this would neither be quantitatively nor qualitatively sufficient to meet the needs of Newbury</b>” (our emphasis).</p> <p>The Assessment also concluded:</p> <ul style="list-style-type: none"> <li>• Generally vacancy in Newbury is low and the properties that are currently being marketed are older and are not attractive to modern occupier requirements.</li> <li>• Evidence shows that the bulk of take up comes from SMEs with a focus on locations such as Theale and Newbury – these are the areas which are consistently seeing the most demand. Demand is usually for units up to 20,000 sq ft. These locations also attract the occasional larger requirement from corporate occupiers as they have suitable quality stock.</li> <li>• Office occupiers prefer to be closer to the town centre or a motorway junction. But due to the lack of available space and land, they are now prepared to take space in locations such as Greenham Business Park, which is remote from the range of services and facilities available in Newbury town centre and much less accessible by public transport, but it is where good quality stock is available.</li> <li>• Due to the lack of alternative sites and marginally viability to build new, additional loss of space would negatively impact the market i.e. existing employment sites should be protected. <b>The Council should seek to allocate additional land around Newbury to satisfy future demand</b> (our emphasis).</li> </ul> <p>Newbury has suffered a substantial reduction in its existing office stock because of Class O conversions to residential use. The loss of major companies such as Quantel and Bayer is also symptomatic of Newbury’s decline as an important sub regional commercial centre. It is incumbent upon the Council to respond to these market signals by ensuring that there is deliverable supply of high-quality</p>	<p>market signals are generally not sufficient to trigger new build office development on a speculative basis.</p> <p>Given the shortfall in supply of office space the Council reassessed all the HELAA sites submitted for employment, including this site at Speen. Unfortunately, none of the sites promoted were considered suitable to allocate for various reasons. For this particular site promoted in Speen, the updated HELAA maintains the conclusion that the site is detached from the existing settlement at Newbury and does not relate well to the existing settlement form and pattern.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>sites available for office development in locations that will be attractive to the potential occupiers and investors.</p> <p><u>National Planning Policy</u></p> <p>The Framework is very clear about the importance of economic development. In particular we note:</p> <p>Paragraph 11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) plans <b>should positively seek opportunities to meet the development needs of their area</b>, and be sufficiently flexible to adapt to rapid change; b) strategic policies should, as a minimum, provide for <b>objectively assessed needs for housing and other uses</b> (our emphasis).</p> <p>Paragraph 20. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision (In line with the presumption in favour of sustainable development) for: a) housing (including affordable housing), employment, retail, leisure and other commercial development.</p> <p>Paragraph 80. Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.</p> <p><u>The draft Local Plan Review (dLPR)</u></p> <p>The dLPR's response to the Government's objectives and policies and the assessed quantitative and qualitative need for office space is wholly inadequate. It makes only the one new allocation at Theale (20,000 sqm), relying on the potential combination of new office provision on the London Road Industrial Estate, redevelopment schemes in Newbury town centre, and/or</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>mixed-use allocations on larger housing sites to meet the remainder of the District (and all of Newbury's) demand for additional office space.</p> <p>There is little evidence of any viable redevelopment scheme coming forward on the LRIE or within the town centre in the foreseeable future. The consented Faraday Plaza scheme includes an element of office use but has stalled for many years. The proposed mixed-use scheme to redevelop the Newspaper House site included new offices but would only have been viable in conjunction with the residential development proposed, which the Council refused (and which was subsequently rejected on appeal because of flood risk and the sequential test). None of the strategic housing allocations include specific proposals for new offices, and in any event are not in locations that would be attractive to major office users (and are unlikely to be available for many years).</p> <p>The reliance on unidentified windfall sites to meet 85% of the demand for new office floor is not good enough. It is self-evidently a strategy that fails, as a minimum, to meet the area's objectively assessed needs. The dLPR is therefore neither "positively prepared" nor "consistent with national policy". As currently drafted it would be found unsound (Paragraph 35 of the Framework).</p> <p>Given that the dLPR's Spatial Strategy (Policy SP1) confirms that the Town is to remain the main focus for office development, it is essential that a new site allocation for high quality office development is made for Newbury.</p> <p><u>HELAA</u></p> <p>The HELAA assessed the suitability of the Site (<i>promoted</i>) to accommodate 13,200 sqm (using a plot ratio of 60%). It concluded that the Site was unsuitable for the single reason that "is detached from the existing settlement at Newbury and does not relate well to the existing settlement form and pattern". The Assessment concluded that in all other respects the Site was suitable for development (although in some cases further technical work would be needed and mitigation required). In summary the Assessment found:</p>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Site is detached from the AONB and development would not result in harm</li> <li>• Access can only be obtained via the A4, which appears achievable. Highways England would not allow an access onto the A34 slip road. Footways exist opposite the site. Transport Assessment required due to its close proximity to the A34</li> <li>• Site within Flood Zone 1. Low probability of flooding.</li> <li>• A small area of high risk pooling occurs at the western edge of the site. Flood risk covers ≈1% of the site</li> <li>• The site is classified as Grade 3b agricultural land.</li> <li>• Low risk of noise and vibration problems to future occupant</li> <li>• Impact on nature conservation interest and biodiversity - Capable of mitigation - Up to date ecological surveys will therefore be needed to establish current site conditions and the presence of any protected species at the site. <ul style="list-style-type: none"> <li>○ Priority habitats within site and within 500m radius surround.</li> <li>○ Ancient woodlands within 500m.</li> <li>○ European protected species within 500m.</li> <li>○ Priority species within 500m.</li> <li>○ No statutory sites within 500m.</li> <li>○ Site of Special Scientific Interest Impact Risk Zone within 500m.</li> <li>○ Local Wildlife Site within 500</li> </ul> </li> <li>• No loss of Green Infrastructure</li> <li>• Heritage - Heritage Impact and Desk-based Archaeological Assessments required which should have regard to: <ul style="list-style-type: none"> <li>○ Located to the north of Speen House which contains a number of listed buildings:</li> <li>○ Views from Donnington Castle need to be carefully considered.</li> <li>○ Potential impact on setting of Speen CA</li> <li>○ Likely to have been a significant location at the Second Battle of Newbury – but not designated.</li> </ul> </li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>○ Site within proposed Mineral Safeguarding Area. Consideration of mineral sterilisation issues is required.</li> </ul> <p><u>The Site's Development Potential</u></p> <p>As the extract from the Council's online mapping below shows, the site is not constrained by any planning designation, other than its "countryside" location outside the Settlement Boundary. The HELAA's assessment found no physical, infrastructure, visual, heritage or environmental constraints to development that are not capable of being mitigated.</p> <p>The Site is on the edge of the built-up area, physically and visually contained by urban infrastructure. It is completely severed from the open countryside to the west. It is very difficult to accept the HELAA's conclusion that the Site "does not relate well to the existing settlement form and pattern". That could only be true if one ignores the housing site to the east, which is allocated in the Housing Site Allocation DPD and now has the benefit of planning permission (and is currently being marketed). Given the adjoining housing site, the Site is demonstrably well related to the built up area and represents an entirely logical "rounding off" opportunity.</p> <p><i>(See map in attached)</i></p> <p>The Site is exceptionally well located to meet the requirements of modern office users. It has the potential to accommodate the highest quality landmark (or Gateway) office scheme. The Site should be allocated in the dLPR for the development of approximately 13,000sqm of office development.</p> <p><u>Summary</u></p> <p>There is an objectively assessed need for additional office accommodation at Newbury which the dLPR fails to adequately meet.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The only reason the HELAA found the Site to be unsuitable for development was because it was regarded as not being “well related to the existing settlement form and pattern”. That conclusion does not stand up to scrutiny.</p> <p>The Site should be allocated in the dLPR to help meet the objectively assessed need and so demonstrate that the dLPR has been positively prepared and is consistent with national policy.</p> <p>We trust the above comments clearly set out our client’s position at this stage but if you require any further information on our representations please do contact us. We look forward to engaging with the Council through the continued preparation of the Local Plan Review.</p>	
Savills on behalf of Englefield Estate Office (lpr1532)	<p>Draft LPR Policy SP20 makes provision for 62,000sqm of office floorspace and 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period. However, the Employment Land Review (2020) and the supporting text to Policy SP20 (paragraph 7.3) are clear that these figures represent the ‘<i>minimum</i>’ need and therefore it is important that this is reflected in the policy itself.</p> <p>Draft LPR Policy SP20 adds that these identified needs will be met at new and existing Designated Employment Areas and town centre sites, but makes no reference to the contribution from development at existing employment sites or at suitable rural sites. It is important that this is recognised in draft Policy SP20 given that this is the overarching economic policy for the district and given the importance of these sites to the local rural economy. Indeed, in the case of rural employment opportunities, this omission in the LPR as drafted is contrary to paragraph 83 of the NPPF which clearly supports rural employment opportunities, stating that planning policies should ‘<i>enable the sustainable growth and expansion of all types of business in rural areas</i>’.</p> <p>Instead Policy SP20 states that the development of Class E and Class F uses in rural areas will be required to demonstrate that there are no other sequentially preferable sites and that town centres will not be adversely affected. The NPPF is clear however that small-scale proposals (under</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 and Emerging Draft LPR Policy DM32 will be amended to make sure the aims of both policies is clear.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council’s strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites.</p> <p>Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy recognises that many rural areas host a large number of small and medium sized enterprises which are vital to providing local job opportunities and a diverse economy. The policy therefore seeks to support appropriate new or expanding businesses in the countryside, supporting sustainable economic growth within the rural areas without detriment to the environment.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>2,500sqm) should not be subject to the sequential test. This is noted at supporting paragraph 7.10 but must be stated within Policy SP20 itself to ensure that suitable small-scale proposals can come forward to support the rural economy without unnecessary additional justification.</p> <p>The policy is also at odds somewhat with draft Policy DC32 which supports development in rural areas. It is crucial that there are clear links between Policies SP20 and DC32 to ensure that appropriate employment growth can come forward in rural areas.</p> <p>Whilst the policy relates specifically to employment development, as explained at paragraph 7.1; given the recent changes to the Use Classes Order (combining office, commercial and service uses together within Class E) it is important that the Council allow for changes of use across these commercial uses where appropriate.</p>	
Deloitte on behalf of Green Park Reading No.1 LLP (lpr2033)	<p><i>Full representation attached, in relation to Green Park, Reading</i></p> <p><u>Policy SP20 Strategic approach to economic development and hierarchy of centres</u></p> <p>Policy SP20 identifies that the LPR makes provision for 62,000 sqm of office (Class E) floorspace over the plan period. The Policy states that development of office uses outside of existing town and district centres will be required to demonstrate:</p> <p>“- There are no other sequentially preferable sites within or on the edge of centres and Designated Employment Areas (not in an edge or out of centre location); and</p> <p>- The vitality and viability of the existing town and district centres will not be adversely affected.”</p>	<p>Comments noted.</p> <p>Green Park lies outside of West Berkshire District and therefore it is not possible for the LPR to apply a designation to this site as it is land that is located outside of the area covered by the LPR.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council’s strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites. Business development in the countryside is addressed under Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy – which considers economic development, including office, industry, storage and distribution, in the countryside.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>In the first instance, GPR requests that Green Park is classified as a Designated Employment Area. However, if this approach is not taken it is important, as outlined in the response to Policy SP1, that the LPR does not restrict business development coming forward in suitable locations outside of Designated Employment Areas. It is clear from Green Park’s current success to date that business development in this area would be entirely appropriate and should be encouraged. GPR requests that Policy SP20 is updated to include a third bullet point as follows: “or it is in a suitable location adjacent to existing and established office or business locations.”</p> <p>It is also important that the LPR recognises the benefits of providing business development with supporting ancillary uses such as small-scale retail or hotel. These uses can support the continued economic function of existing and future employment areas, support the efficient use of land, and travel which is less reliant on unsustainable transport modes. GPR therefore requests that a supporting note is added to Policy SP20 to confirm it is appropriate for new office development to include supporting ancillary uses such as smallscale retail or hotel use.</p> <p>GPR also requests that Policy SP20 is updated to include reference to data centres being appropriate business development. Data centres are increasingly vital to support the digital needs of companies working at the forefront of digital innovation and can be especially suitable for some otherwise constrained locations. Green Park is within close proximity to Reading and the wider Thames Valley and would be a suitable location for data centres to support the area’s existing and future businesses.</p>	<p>Whilst the Emerging Draft LPR Policy SP20 will be amended to remove the requirement for office developments within a DEA to satisfy the sequential test, proposals for office development not within a DEA or town or district centre will be required to satisfy the sequential test.</p>
Barton Willmore on behalf of Copas Farms (lpr1972)	<p>Draft policy SP20 indicates that the development of office, other commercial and services uses (Class E) and community uses outside existing town and district centres need to be justified via a sequential test. However, by reference to Class E, this policy implies that light industrial and R&amp;D (formally B1(b) and B1(c) uses) is a town centre use, and therefore such development requires a sequential test if located outside of existing town and district centres. However, the NPPF is clear that office use (formally B1a) is considered a main town</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 will be amended to reflect the NPPF in this regard.</p>

Respondent (with lpr ref)	Response	Council Response
	centre use but not light industrial and R&D. The text within draft policy SP20 should be revised to make this explicit.	
Savills UK Ltd on behalf of Newbury & District Agricultural Society (lpr2045)	<p><i>See attached for full representation</i></p> <p>In setting out the overarching approach to new economic development, draft Policy SP20 establishes that sufficient land will be allocated to deliver at least 65,000 square metres of industrial, storage and distribution (Classes B2 and B8) floorspace over the plan period. The supporting text states that the purpose of this policy is to plan for the growth needed to meet the District's economic needs over the plan period.</p> <p>In accordance with our comments on the Council's Evidence Base, this policy should be sufficiently flexible to allow for more significant delivery of major employment sites where the need arises from regional or national requirements.</p> <p>The West Berkshire ELR should demonstrate a broader assessment of market demand for new logistics floorspace across regional and national markets, in accordance with national planning guidance (<i>see full response for details</i>).</p> <p>The PPG specifically identifies that the logistics industry plays a 'critical' role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses. It also adds that this sector has distinct locational requirements that 'need' to be considered in formulating planning policies separately from those relating to general employment land.</p> <p>In accordance with the PPG, the Council should consider incorporating a new policy which specifically relates to the regional and national demands of the logistics and distribution industry, allocating sites where (and at a scale) those businesses wish to locate.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this evidence using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The ELR does not analyse strategic (sub-regional) logistics/distribution as it was considered that this is best approached on a site availability perspective.</p>
Pro Vision on behalf of The Wasing Estate (lpr2067)	<p><i>In relation to Larkwhistle Farm, Brimpton (full representation attached)</i></p> <p>This representation relates to our client's land at Larkwhistle Farm, Brimpton Road ("the site").</p>	<p>Comments noted.</p> <p>Text within, and supporting, the Emerging Draft LPR policy will be amended to make clear how the LPR will</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The site is identified in the Council's Housing and Economic Land Availability Assessment (HELAA) as BRIM3, as shown in the Council's map below - <i>attached</i>.</p> <p>The site is outside of any settlement boundary and is outside of the Area of Outstanding Natural Beauty (AONB). It is within the inner emergency planning zone of AWE Aldermaston.</p> <p><b>Employment and economic development</b> The draft LPR explains that West Berkshire's vision is to <i>"retain and attract sustainable business growth with training and employment opportunities. A variety of different sectors together with a combination of larger businesses and small and medium-sized enterprises will ensure a resilient and sustainable economy. 1" Its economic strategic objective is to "facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities"</i>.</p> <p>The evidence base that informed the preparation of the draft LPR includes an Employment Land Review, Functional Economic Market Area (FEMA) and Economic Development Needs Assessment (EDNA).</p> <p>The Employment Land Review states:</p> <ul style="list-style-type: none"> <li>• A minimum of 65,000 sqm of new office floorspace should be provided in the Plan. Some could come forward through office provision at Theale (THE8). However, this would neither be quantitatively nor qualitatively sufficient to meet the needs of Newbury;</li> <li>• The Council should scope the next generation of policies so that if market demand for offices strengthens, it is clear that the 65,000sqm requirement is a minimum and policy is flexible and supportive for all forms of office development;</li> <li>• For industrial, demand is more pressing given the current market shortage and there is a need to frontload the Plan with 62,000sqm of deliverable sites;</li> </ul>	<p>seek to address the requirements for employment land over the plan period. The LPR will make provision for industrial land through site allocations, to assist in accommodating the forecasted industrial requirements to 2039. However, given the current weakened office market and a lack of suitable available sites there remains a shortfall in supply of both office and industrial space. The Council has positively sought opportunities to meet the identified need and will commit to reviewing the matter again at the first 5 year review.</p> <p>With regards to offices, very few sites were promoted to the Council for office development and this is not surprising given the limited viability in the market at present. The Council's evidence confirms that the market signals are generally not sufficient to trigger new build office development on a speculative basis.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• The HELAA identified only one possible office site in the East of the District and saw nothing at all promoted in Newbury town. The likelihood is that sites are instead being promoted for housing – especially given the weak office market in the past; and</li> <li>• For both markets the Council needs to consider if additional land can be identified.</li> </ul> <p>Draft Policy SP20 sets out the strategic approach to economic development and hierarchy of centres. Within this, it states provision has been made for 62,000sqm of office floorspace and 65,000sqm of industrial, storage and distribution. Both of which are below the identified requirements as set out in the Employment Land Review. This should be reviewed and additional sites identified to <u>at least</u> provide for the District’s minimum requirements, noting the recommendations in the Employment Land Review.</p> <p>The Policy explains that such provision will be achieved by, inter alia, the development of office, other commercial and service uses (class E) and community uses (Class F) outside existing town and district centres provided it can be demonstrated that there are no other sequentially preferable sites within or on the edge of centres and Designated Employment Areas and that the vitality and viability of existing town and district centres will not be adversely affected.</p> <p>Supporting text for draft Policy SP20 states that <i>“The Council’s preferred approach is that if an edge of centre or out of centre site must be utilised for office development, then the site should be located within an existing Designated Employment Area. If this is shown not to be possible, then an impact assessment is required to clearly show that the vitality and viability of the District’s town and district centres is not adversely affected.”</i></p> <p>Although perhaps overly restrictive, we support this general allowance for office development beyond just the town and district centres and Designated Employment Areas. This would appear to reflect NPPF, stating that <i>“planning policies and decision should enable the sustainable growth and expansion of all</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>types of business in rural areas, both through conversion of existing buildings and well-designed new buildings”.</i></p> <p><i>Site promotion details attached.</i></p> <p><b>Summary and conclusion</b></p> <p>The LPR does not identify sufficient deliverable sites to meet the identified employment needs of the District. This is inadequate and the LPR should go further in identifying additional sites.</p> <p>It has been made clear in the Employment Land Review that the identified requirements is a minimum and that the Council should be flexible and supportive of all forms of employment development.</p> <p>There should be less reliance upon existing and Designated Employment Sites – the Council should be open to considering if additional land can be identified, as noted in the Employment Land Review.</p> <p>Larkwhistle Farm is a suitable, available and achievable site for employment development. It is appropriately located nearby to Calleva Park Designated Employment Area and would be compatible with surrounding uses. It would also accord with West Berkshire’s strategic objective to “facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities”.</p> <p>The allocation of this site would assist the Council in meeting its identified employment needs over the Plan period.</p> <p>We trust that this site will be given due consideration and we look forward to engaging with the Council through the continued preparation of the LPR.</p>	

Respondent (with lpr ref)	Response	Council Response
Montagu Evans on behalf of Royal & Sun Alliance Insurance PLC (lpr2112)	<p><i>Full representation on behalf of Royal &amp; Sun Alliance Insurance promoting residential development at Greenham Road Retail Park is attached.</i></p> <p>Policy SP20 outlines the Council's approach to supporting economic growth and retail development. Chief to this strategy is the focus on supporting retail and town centre uses in designated centres, whereby development will be directed to Newbury as the District's only Major Town Centre.</p> <p>Associated with this, we would advise that the Council provides explicit policy support for the redevelopment of underutilised, non-designated retail assets in urban locations, to alternate uses including residential. This would allow the Council to safeguard its strategic retail assets whilst balancing this against the need to achieve wider planning objectives, particularly delivering housing. This would ensure that suitable development sites which provide limited value as retail assets are not stymied from redevelopment because of an overly protective policy approach.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 will be split to separate the town centre elements of this policy into a standalone policy relating to town centres. The new town centre policy (Proposed Submission LPR Policy SP22) will seek to maintain and enhance the vitality and viability of town and district centres. This policy will support redevelopment and regeneration of sites in town and district centres.</p>
Bell Cornwell LLP on behalf of Kerridge Properties (lpr2128)	<p>Policy is not supported.</p> <p>(In relation to land at Charnham Park, Hungerford - <i>see attached for full representation</i>)</p> <p>These representations are submitted on behalf of our client Kerridge Properties Ltd in response to the current consultation on the Regulation 18 version of the emerging West Berkshire Local Plan.</p> <p>On their behalf, we are promoting an area of land at Charnham Park in Hungerford as suitable for removal from the proposed boundary of the Designated Employment Area (DEA) in this location.</p> <p>The site is currently included within the Protected Employment Area (PEA) of Charnham Park. This is a long-standing planning designation which seeks (in summary) to protect land within the employment area for uses within the historic B use classes (business, general industrial and storage/distribution). The land</p>	<p>Comments noted.</p> <p>As part of the evidence base which informs the Local Plan Review the Council has undertaken a review of the District's Protected Employment Areas, to be renamed Designated Employment Areas (DEAs) through the LPR process. As part of this work, Charnham Park and the parcel of land submitted within this representation has been considered.</p> <p>The Council has reviewed the designated areas, taking the Employment Land Review (ELR) as the starting point in considering how each area performs including any key issues or opportunities, and any changes in circumstances, in particular where there has been a loss of office space to residential through permitted development rights, or new development adjacent to existing areas. This work also takes in account</p>

Respondent (with lpr ref)	Response	Council Response
	<p>has not come forward for an employment use despite being included within an employment area for over 20 years.</p> <p>We therefore seek the removal of the land from this restrictive use to give additional flexibility for the site to be developed for an alternative use. Our clients would seek a use which was compatible with the area and, in any case, the relationship of any proposal with the surrounding uses would be fully assessed as part of the development management process.</p> <p>We consider that the information that we will set out within these representations provides a robust support of our client's position and that making this change to the boundary would be a justified strategy which would increase the effectiveness of the Local Plan.</p> <p>The proposed amendment would also be consistent with national policy. We will refer to the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) on the issue of the effective use of land and evidence regarding whether land should be reallocated for a more deliverable use.</p> <p>We show below, for ease of reference, the area of land which we are promoting as suitable for removal from the proposed Designated Employment Area (DEA) at Charnham Park. We also include a full sized version of this plan as Appendix A. <i>See attached</i></p> <p>The red hatched area is the undeveloped area of land that we are seeking to be excluded from the DEA. This is shown on the plan in two parcels – Parcel A is to the north of the pipeline and measures 2264 sqm. Parcel B measures 5970 sqm. The blue area is other land within our client's ownership at Charnham Park.</p> <p>It can be seen that the land is split by a fuel pipeline which runs directly to Heathrow. This cannot be moved and has to be protected in perpetuity. The undeveloped land runs to the south of the pipeline. The area also extends to the</p>	<p>allocations set out within the LPR and the designation of new DEA as identified in Proposed Submission LPR Policy SP21.</p> <p>The conclusions of the DEA review work will be published alongside the Regulation 19 consultation.</p> <p>The Council's evidence (ELR 2020 and 2022) highlights high occupancy rates for industrial uses and high to moderate occupancy for office space and given the balance between supply and demand, the ELR recommends safeguarding all DEAs for business uses/development. It is important to safeguard the District's DEAs for the role they play in providing a supply of employment land to meet the existing and future needs of businesses. Maintaining a supply of employment land is essential to ensure the economic competitiveness of the District and to deliver sustainable economic growth.</p> <p>The Charnham Park site assessment within the ELR, states that it is the newest and main business park in Hungerford. A purpose built cluster of modern office, industrial and logistic and distribution space, with the leisure centre also on site. It goes on to state that Charnham Park is Hungerford's premier industrial and office location, mainly due to the access advantages. With regards to releasing the particular site in question, the ELR confirms that this is a suitable location for employment activity and recommends safeguarding.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>north of the pipeline. This area is also generally unmade and currently used as overflow parking by CDK.</p> <p>Whilst we seek the removal of all of the hatched area, if the Council does not consider that this would be a justified amendment to the DEA then we would be willing to accept the release of Area B in isolation.</p> <p>Site History</p> <p>The site lies on part of an extant permission for B1 uses as permitted under application reference 01/01227/ful. Part of this has been implemented and comprises the office block to the north of the application site.</p> <p>01/01227/ful. Erection of Headquarters B1 development (6158m<sup>2</sup>) comprising research and development facilities, management training centre plus ASP centre plus 217 car parking spaces Erection of 2 storey Amenity and Recreation Building (2035m<sup>2</sup>) plus parking. This was granted consent in 2003 but only partially implemented through the construction of an office block to the north of the site.</p> <p>10/00845/COMIND. This was an application for a 65-bed hotel development including ancillary facilities and a restaurant, together with 42 car parking spaces for the hotel plus a further 23 spaces to be shared with the adjoining offices to the rear.</p> <p>The proposal was on part of the land covered by the extant B1 consent from 2001. The application was refused by the Council but won on appeal. The appeal decision concluded that <i>the hotel proposal would provide for employment generating development which would make a positive contribution to the local tourism industry and the economy of the area, and meet the objectives of up to date Government policy</i></p> <p>The appeal Inspector also concluded that the site was in a sustainable location and that the hotel proposal would not be harmful to the AONB or to the character or appearance of the Kennet and Avon canal.</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>Whilst the consent has been implemented in planning terms, it has not, however, been delivered for a hotel use.</p> <p>It is also relevant that our client successfully appealed a refusal by the Council (and won partial costs) for the change of use of a former children's creche (use class D1) at the adjacent Herongate Leisure Centre to 4 serviced apartments (use class C1). This was application reference 19/00429/FUL from 2019. The Inspector stated that: <i>it is apparent that uses falling outside the B Classes of the UCO have been found acceptable within the area that is the subject of the employment designation.</i></p> <p>The Council has demonstrated inflexibility on an ongoing basis with regard to the interpretation of its employment policy, which has led to suitable proposals outside of business uses being refused by the Council but won at appeal. This gives a considerable additional degree of uncertainty and potential high costs when considering the future use of the site. This is off-putting for future operators when considering the potential of the site.</p> <p>No development in the historic B use classes has come forward on the site outside the original B1 office consent which was granted 20 years ago. By continuing to restrict development on the site on an ongoing basis by applying an out of date policy position, the Council is rendering the land unusable. This is not a proactive response, nor is it responsive to the changing working environment or the wider needs of Hungerford Town.</p> <p>Emerging Policy and Evidence</p> <p>Within the extant development plan, the site currently lies within a Protected Employment Area (PEA) and the policy approach to development within the PEAs is set out in policy CS9 of the adopted Core Strategy (Location and Type of Business Development). This policy, in turn, replaced policy ECON 1 of the 'old' West Berkshire Local Plan, but did not update the boundaries of the employment areas.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The supporting text to policy CS9 confirms that ‘a comprehensive assessment of existing Protected Employment Areas and their boundaries will take place as part of the Site Allocations and Delivery DPD.....evidence such as business surveys, Annual Monitoring Reports and the composition of each Protected Employment Area including the age, quality, location and capacity of sites and premises must be taken into account, together with the surrounding uses’.</p> <p>The Protected Employment Areas are now becoming Designated Employment Areas (DEAs) in the emerging Local Plan. Whilst some areas are proposed as new DEAs, the Council does not appear to have reviewed the boundaries of the existing PEAs in detail to see if any areas should be removed from them. This did not take place through the Site Allocations and Delivery DPD either. Policy CS9 of the Core Strategy was found sound on the basis that the policy set out a clear framework for the detailed review of the employment areas within a short period of time. This has not happened.</p> <p>The Council’s evidence base to support the employment policy is the Employment Land Review, which was prepared by Stantec and published in August 2020, but this work does not seem particularly detailed or granular with regard to boundary reviews, or consider why parts of existing employment sites have not come forward for development.</p> <p>We disagree with the Council’s approach to largely ‘carrying over’ the geographical extent of the employment site boundaries. These are now very old and were defined either through the ‘old’ Local Plan which was adopted in 2002 – or at same date prior to that. They are therefore considerably out of date and should be proactively reviewed in detail against a transparent and consistent set of criteria as part of the emerging Local Plan process to ensure that they are fit for purpose.</p> <p>With regard to Charnham Park, the Employment Land Review states that there is one undeveloped parcel which has consent for a hotel. It does not explain that this consent was granted on appeal in 2011 and has not yet come forward, or raise any suggestions about why this land has remained undeveloped. This is not helpful, nor positive. The ELR also states that the adjacent Charnham</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Lane employment area should be included within the DEA. However, this recommendation does not appear to have been accepted by the Council.</p> <p>The emerging policy to manage development in the DEAs is policy DC11. This has the same principles as extant policy CS9, however the national policy has evolved since that policy was adopted in 2012. We do not consider that the Council's approach is fully in conformity with national policy as we set out below.</p> <p>The NPPF (2019) chapter 11 seeks an effective use of land. Paragraph 120 is particularly relevant. This states that:</p> <p><i>Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans and of land availability. Where the local planning authority considers there is no reasonable prospect of an application coming forward for the use allocated in a plan:</i></p> <p><i>a) They should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</i></p> <p><i>b) In the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.</i></p> <p>We note that the Council has been reluctant to permit applications for alternative uses on the land, despite the evidence which demonstrates that the site is unlikely to come forward or the fact that alternative uses can provide significant wider benefits to the employment area (as has been accepted elsewhere).</p> <p>Given that the site has not been developed since it was designated (at least 20 years ago) our assessment is that there is no realistic prospect that it will now come forward for the business uses envisaged by the Council.</p> <p>The Planning Practice Guidance (Paragraph: 001 Reference ID: 66-001-20190722) that provides additional information about how to deliver the NPPF</p>	

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>confirms what needs to be taken into account when considering whether or not an allocated site is likely to come forward for its intended use. These matters include the following:</p> <ul style="list-style-type: none"> <li>• the length of time since the site was allocated in the development plan;</li> <li>• the planning history of the site including any planning applications or pre-application enquiries;</li> <li>• whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price; and</li> <li>• whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.</li> </ul> <p>In response to these matters, we have explained how the site was allocated over 20 years ago and has not been developed for either employment use or employment generating use to date. Whilst there have been a couple of planning applications, one (for business use) was only partially implemented due to a change of ownership and the hotel consent (won at appeal) has not been taken up and is now ten years old. This is despite active marketing by Kerridge Properties Ltd on both a sale and lease basis. Given changing working practices in recent times, it is even less likely that the site will be taken up for a business use.</p> <p>Our assessment is that continuing to include the site within the Designated Employment Area boundary would not be consistent with national policy. Given the information set out above, the Council should revise the boundary of the DEA to remove the site, either in full, or part, to allow it to come forward for an alternative use.</p> <p>Conclusion</p> <p>We seek the removal of an area of land at Charnham Park (either in full or part) from the Charnham Park Designated Employment Area to give flexibility to bring the site forward for alternative uses.</p> <p>We have explained in these representations that despite being included within the boundary of the Charnham Park employment area for at least twenty years,</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>the site has not been developed to date for either employment or hotel uses, although it has been marketed on an ongoing basis. There have not been any planning applications on the site for a number of years.</p> <p>The site is in an important road frontage location, and should be seen as part of the gateway to Hungerford. It now needs to be considered positively, rather than artificially restricted by a historic policy approach, to allow an appropriate development can come forward.</p> <p>Given the history and the active encouragement within national policy and guidance to ensure effective use of land, the Council should not continue apply a designation to this land which simply is not proving to be attractive to the market.</p> <p>A more detailed approach to reviewing the boundaries of the employment sites in the District to ensure that they are fit for purpose would be a justified and effective way forward for the Local Plan Review. It is very clear that the policy approach to an unused site, with a road frontage in a prime location, must be reconsidered.</p> <p>We would be happy to discuss these representations with the Council as the work on the Local Plan progresses.</p>	
Gerald Eve LLP on behalf of Fairhurst Estate (lpr2365)	<p>Policy is not supported.</p> <p>Our clients own and control land situated immediately to the south east of the motorway junction. A site location plan of this land is included at Annex 1 (<i>attached</i>).</p> <p>It is considered that the land provides an opportunity for meeting some of the economic objectives of the new Plan in an appropriate and deliverable form with excellent access to the strategic highway network, and the potential for enhanced linkages into Newbury itself.</p>	<p>Comments noted.</p> <p>Following the Regulation 18 consultation the Council reassessed all the HELAA sites submitted for employment. As part of this reassessment further landscape evidence has been undertaken on a number of sites to inform the LPR. The LPR takes a landscape led approach to development given 74% of the District is AONB. The Landscape Sensitivity and Capacity Assessment for this site (Land south east of M4 Junction 13, Chieveley CHI24) outlines that the site has strong relationship with the wider landscape to the south and east across the valley and contributes to the landscape</p>

Respondent (with lpr ref)	Response	Council Response
	<p>We consider that the location should be carefully considered for employment generating uses as part of the Local Plan Review, and was put forward in or response to the Housing and Economic Land Availability Assessment (HELAA).</p> <p>The location was assessed within the HELAA (and given the site reference CHI24). We disagree with the conclusions of the site assessment, and also with the overarching approach of the draft policy approach. The policy approach fails to deliver appropriate opportunities for employment development and economic activity alike. We note that there is not one reference to logistics provision within the entire Emerging Draft West Berkshire Plan which would be most appropriately located adjacent to a key motorway and trunk road junction (M4/A34 Junction 13).</p> <p>Policy SP20 should identify the land under site reference CHI24 for strategic employment development as a Designated Employment Area to allow for the provision of new quality employment space. This could comprise a mixture of employment generating uses that would most appropriately be located adjacent to the interchange, service area and showground.</p> <p>Notwithstanding the comments within the HELAA Stage 2(B) “Assessing Suitability”, the site is capable of providing access to the highway network without passing through or impacting the service area. Liasion would be required with Highways England and other stakeholders in order to achieve an appropriate solution.</p> <p>In respect of other considerations within the HELAA, Sustainable Drainage Systems could be incorporated, and as noted, there would be low risk from 24 hour per day operations which would suit many employment generating enterprises seeking to locate here. As a result of ownership, the site could deliver a net gain in biodiversity, and also any Green Infrastructure requirements.</p>	<p>pattern of open farmland within the valleys contrasting with the upper wooded valley sides. Development on the site would impact on the AONB through the loss of open setting of adjacent woodlands, including ancient woodlands, loss of open land within the AONB, adverse impact on the rural character of Marsh Lane and Chalky Lane, increase noise and traffic levels on local area and increased external lighting resulting in further light pollution.</p> <p>The landscape assessment concludes that the site is not considered for development.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>In respect of the landscape setting, layout principles and frameworks could frame the form of development.</p> <p>We strongly disagree with the conclusions in respect of suitability within Stage 2(b), and consider that:</p> <ul style="list-style-type: none"> <li>• Development would be capable of being appropriate subject to establishing principles of design;</li> <li>• The location adjacent to a key interchange on the motorway and trunk road network means that it is ideally suited for several forms of employment generating development; and</li> <li>• Any concerns around highways impacts would be capable of being overcome and mitigated as appropriate.</li> </ul> <p>Changes to be made/preferred approach: Further consideration of the site assessed as CHI24 within the HELAA should be undertaken. We consider that the site as shown within the area of CHI24 and as identified on the enclosed plan merits further investigation and consideration for a range of employment generating uses.</p>	
Ptarmigan Group (lpr2344)	<p>Policy is supported.</p> <p>Draft Policy SP20 makes provision for 65,000sqm of industrial, storage and distribution floorspace in the District over the plan period. We support the Council's approach to allocate industrial land in the LPR to help address the current market shortage as outlined in the ELR (2020) at paragraph 12:</p> <p><i>“ .. Demand is also more pressing given the current market shortage, and there is a need to frontload the plan with 16 ha of easily deliverable sites. Four or possibly five potentially suitable sites are identified through the HELAA that are capable of meeting the need for industrial floorspace. All of these sites are extensions to existing employment areas, and these are in the main area of market demand in the east of the District.”</i></p>	<p>Comments noted.</p> <p>For clarity, the Council's Employment Land Review (ELR) 2020 and Updated ELR (2022) supersedes the 2016 Berkshire Economic Development Needs Assessment (EDNA).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The ELR (2020) and the supporting text to draft Policy SP20 (paragraph 7.3) are clear that these figures represent the ‘minimum’ needed and therefore it is important that this is reflected in the Policy itself.</p> <p>The findings of the ELR (2020) in relation to industrial, storage and distribution floorspace also correlate with the Berkshire Functional Economic Market Area Assessment (FEMA) and Western Berkshire Economic Development Needs Assessment (EDNA) produced in 2016. The purpose of the EDNA was to provide an understanding of the future business needs and requirements for employment land and floorspace within the defined FEMA to 2036. A clear conclusion from the Western Berkshire EDNA, as stated in the executive summary on page 6, was that:</p> <p><i>“Demand for industrial space remains strong and very low levels of vacancy reflect a limited supply of industrial accommodation (particularly modern, good quality space). Development of new industrial space in the FEMA has been limited in recent years, with much of the existing stock relatively dated and in need of refurbishment. Local commercial property agents report that demand for industrial premises is currently outstripping supply, and an upward trend in industrial rental values in recent years has led to new speculative industrial development being just about viable within the FEMA. <b>The key issue going forward is a lack of new land and/or space to accommodate new development.</b>”</i> [our emphasis]</p> <p>The provision of additional industrial, storage and distribution floorspace in the LPR would clearly help to address the above imbalance between demand and supply. Paragraph 5.18 of the EDNA also stated that:</p> <p><i>“Whilst this EDNA study provides an objective assessment of economic development needs within the Western Berkshire FEMA over the period 2013- 2036, the ability of the local authority to meet these needs over this period is ultimately an issue that will need to be determined through the next stage of the Local Plan making process.”</i></p>	



Respondent (with lpr ref)	Response	Council Response
	<p>Draft Policy SP20 identifies how the identified needs will be met which includes through the creation of new DEAs and extensions to existing DEAs (criterion a). This approach is supported and is also in accordance with paragraph 82 of the National Planning Policy Framework (NPPF) which states that planning policies should recognise the specific locational requirements of different sectors including for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	
<p>Pro Vision on behalf of Feltham Properties (lpr2281)</p>	<p>Policy SP20 confirms that retail development (i.e. Class E) development outside existing town and district centres will be required to demonstrate that there are no other sequentially preferable sites within or on the edge of centres; and the vitality and viability of the existing town and district centres will not be adversely affected.</p> <p>The draft Policy does not, however, clarify when retail impact assessments will be required for out-of-centre proposals.</p> <p>In the absence of a locally set threshold, supporting by evidence, the policy should confirm that the Council will rely on the default threshold set out in the National Planning Policy Framework, 2019 (NPPF) (paragraph 89), which is for proposals greater than 2,500 sq. m of gross floorspace.</p> <p>However, it is considered that the Council should acknowledge within the Plan that convenience food retailers (e.g. small supermarkets) may be acceptable on an out-of-town site away from the town centre, providing it does not adversely affect the vitality and viability of the existing town centre.</p> <p>The requirements of food retailers are evolving due to internet shopping with consumers increasingly demanding home deliveries and 'click and collect' services, together with a physical store. As such, these operations will generally require the need for an out-of-centre location given they necessitate larger sites - due to on-site car parking, 'click and collect' kiosks/lanes and additional loading bays for home delivery vans etc. - to offer these services.</p> <p>With the above in mind, it is considered that Policy SP20 should include</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 will be split to separate the town centre elements of this policy into a standalone policy relating to town centres. The new town centre policy (Proposed Submission LPR Policy SP22) will seek to maintain and enhance the vitality and viability of town and district centres.</p> <p>Proposed Submission LPR Policy SP22 will continue to require proposals for main town centre uses to satisfy the sequential test, with the exception of offices proposals within a Designated Employment Area (DEA).</p> <p>Proposed Submission LPR Policy DM39 addresses the provision and retention of local community facilities, while Proposed Submission LPR Policy DM35 seeks to sustain a prosperous rural economy.</p> <p>The LPR will also have a policy safeguarding identified Retail Parks (Proposed Submission LPR Policy DM34).</p>

Respondent (with lpr ref)	Response	Council Response
	qualified support for out-of-centre retail proposals that can demonstrate that the type of goods sold, or the form and operation of the commercial unit proposed could not be conveniently accommodated within the existing centres.	
Planning Potential Ltd on behalf of Aldi Stores (lpr2288)	<p>The purpose of the representation is to express general support for the principle of the West Berkshire Local Plan Review 2020-2037 Emerging Draft, but highlight particular issues and policies that we consider should be reconsidered to ensure that the West Berkshire Local Plan Review provides the best possible future for its residents and businesses.</p> <p>Below are our comments and representations to key issues and policies, although there may other matters to be considered and raised as the West Berkshire Local Plan Review 2020-2037 progresses.</p> <p>It is important to note that retail is an important contributor and critical element to the economy, due to the significant investment achieved through keeping spending local and the job opportunities created. This is in addition to the community benefits of providing accessible, and affordable weekly and top-up food shopping destinations, providing high-quality low priced goods.</p> <p>Introducing an Aldi store to an area reduces the need to travel further afield. Keeping the spending local not only has benefits to the environment through reduced travel, but also retains expenditure in an area, and increases the likelihood of spending taking place in other facilities rather than outside the area.</p> <p>Furthermore, as set out above, a new Aldi store provides approximately 40 new local job opportunities, paying its 'shop floor' staff market leading wages, and has two of the most successful apprentice schemes and graduate programmes in the UK.</p> <p>Apprentices are trained to work in <b>all</b> parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team. Aldi's on-going graduate scheme secures an</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policy SP20 will be split to separate the town centre elements of this policy into a standalone policy relating to town centres. The new town centre policy (Proposed Submission LPR Policy SP22) will seek to maintain and enhance the vitality and viability of town and district centres.</p> <p>Proposed Submission LPR Policy SP22 will continue to require proposals for main town centre uses to satisfy the sequential test, with the exception of offices proposals within a Designated Employment Area (DEA).</p>

Respondent (with lpr ref)	Response	Council Response
	<p>annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK- wide programme.</p> <p>Aldi also offers a large number of other positions within the sites, which include full and part time jobs, and Aldi devise contracts that fit around people's other existing commitments.</p> <p>In addition, the development of new Aldi stores provide a significant contribution to the construction industry, which again benefits the local economy. A number of contractors and skills are required during the build of a new Aldi store, many of which are sourced from the local area.</p> <p>In light of this, we consider the Local Plan policies in respect of economic development should be amended to better reflect the benefits an Aldi store has to the economy, the high quality nature of retail jobs , and the other investment benefits a new store or improvements to an existing store bring to an area.</p> <p>The settlement hierarchy set out in Policy SP 3 highlights the urban areas of Newbury, Thatcham, Eastern Urban Area should be the prime focus for housing and economic development, but we are concerned this may not be reflected by Policy SP 20 'Strategic approach to economic development and hierarchy of centres', which is discussed below.</p> <p>Policy SP 20 'Strategic approach to economic development and hierarchy of centres' states that <i>"New office and retail development will be directed to Newbury Town Centre, and then other town and district centres (as defined by the Policies Map) in line with the following hierarchy:</i></p> <p><i>Major town centre - Newbury</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>Town centre - Thatcham and Hungerford</i></p> <p><i>District Centres - Pangbourne, Lambourn and Theale"</i></p> <p>We consider that by seeking to direct new retail development to Newbury Town Centre as an initial priority, could be to the detriment of other centres throughout West Berkshire. Development that meets the relevant policy requirements and addresses technical considerations, and support local communities should be welcomed throughout West Berkshire.</p> <p>Aldi complement, rather than compete with, existing local traders, independent retailers, and other supermarkets and service providers. Aldi customers therefore use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade, which brings qualitative benefits and should be supported by planning policy.</p>	
Turley on behalf of Richborough Estates Ltd (lpr2387)	<p><i>Full Representation promoting allocation of land north of Silchester Road, Tadley is attached at Policy SP14.</i></p> <p>Policy SP20 refers to the hierarchy of centres and lists Newbury (Major Town Centre), Thatcham and Hungerford (Town Centre), Pangbourne, Lambourn and Theale (District Centres) as the key centres for new office and retail development.</p> <p>As above, it is acknowledged that the whole of Tadley is not within the West Berkshire administrative boundary, however, it is considered that Tadley still acts as a key service centre which contributes towards West Berkshire. To reflect the contribution and notable size of Tadley, it is considered that Tadley should also be included in the hierarchy of centres as a 'Town Centre'. This is important in order to recognise and support development opportunities at the northern edge of Tadley, within West Berkshire. This change would reflect the points made above regarding the role the town plays for some West Berkshire residents and its sustainability credentials.</p>	<p>Comments noted.</p> <p>Tadley lies outside of West Berkshire District and therefore it is not possible for the LPR to apply a designation to this site as it is land that is located outside of the area covered by the Plan.</p> <p>It is recognised that Tadley, which is located within Basingstoke and Deane is identified within its adopted Local Plan as a District Centre.</p>

Respondent (with lpr ref)	Response	Council Response
	Changes to be made/preferred approach: Considered that Tadley should also be included in the hierarchy of centres as a 'Town Centre'.	
West Berkshire Council as landowner of London Road Industrial Estate (LRIE) (LATE SUBMISSION)	<p><b>Strategic approach to economic development and hierarchy of centres</b>  <i>This Local Plan makes provision for 62,000 sqm of office (Class E) floorspace and 65,000 sqm of industrial, storage and distribution (Classes B2 and B8) floorspace over the plan period.</i></p> <p><b>Add 7,000 sqm of employment floorspace to Policy SP20</b> as a result of the Council's aspirations as landowner for LRIE – see below. The evidence for this is contained within the Addendum to the Avison Young Development Brief published in September 2022 available at <a href="https://info.westberks.gov.uk/lrie">https://info.westberks.gov.uk/lrie</a> FINAL DRAFT ATTACHED</p> <p><b>Propose the renaming of the LRIE DEA.</b> There is the potential for confusion between the existing London Road Industrial Estate DEA which includes the adjoining Riverpark Industrial Estate, and the area within the Council's freehold ownership for which the Council as landowner has aspirations – also known as the London Road Industrial Estate (expected to be renamed in early 2023). This should be addressed either by renaming the DEA or by providing clarification within the supporting text.</p> <p>For this reason, propose deleting 3<sup>rd</sup> and 4<sup>th</sup> sentences in para 7.6 of the supporting text as follows, in line with the refreshed approach set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <a href="https://info.westberks.gov.uk/lrie">https://info.westberks.gov.uk/lrie</a> :</p> <p><b>7.6</b> <i>The Council's preferred approach is that that if an edge of centre or out of centre site must be utilised for office development, then the site should be located within an existing DEA. If this is shown not to be possible, then an impact assessment is required to clearly show that the</i></p>	<p>(LATE SUBMISSION)  Comments noted.</p> <p>The supporting text of Emerging Draft LPR Policy SP20 will be amended to ensure the Proposed Submission Draft LPR clearly sets out the Council's approach to the London Road Industrial Estate as Local Planning Authority.</p> <p>There is a subtle difference between the names as the DEA is titled 'London Road Industrial Estates', which includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate. Given the Council expect the name of the Council owned land to change in early 2023, it is not proposed to amend the name of the DEA in the LPR. Proposed Submission LPR Policy SP20 will address this matter within the supporting text, along with the current status of the LRIE.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>vitality and viability of the District's town and district centres is not adversely affected. <del>The London Road Industrial Estate is an edge of centre DEA which has scope for comprehensive regeneration within the plan period to maximise the potential of the site. Office development may be appropriate in that context.</del></i></p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP21 Sites allocated for economic development

#### (Proposed Submission LPR Policy: SP21 Employment site allocations)

Number of responses received: 92

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Natural England (lpr1599)	<p>In relation to EMP5, land west of Ramsbury Road, Membury Industrial Estate: This is an extremely large existing industrial site within the AONB. This allocation is a logical extension merging the two existing employment sites. However, the scale of industrial development in this open landscape would have a visual impact within the locality. This site must be subject to additional landscape sensitivity work to shape the height, landscaping, materials and lighting of the site. In addition, the site should be restricted to the western side of the tree belt and the former runway to contain further expansion.</p> <p>In relation to EMP6 - Land north of Arlington Business Park, Theale East Business Centre: This allocation is within the setting of the AONB. It is developable in parts, with the pylons forming a good natural point to end development out of Theale, whilst still providing buffer to the M4 and disconnect from Reading.</p>	<p>Comments noted.</p> <p><b>EMP5, Membury</b> - It is proposed to create separate policies for each of the employment sites. Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Membury Protected Employment Area (renamed Designated Employment Areas (DEA) through this LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open</p>

Respondent (with lpr ref)	Response	Council Response
		<p>grassland which leads across to the Iron Age hillfort and the wider countryside</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02979/OUTMAJ). It is considered such recommendations need be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p><b>EMP6, Theale</b> – Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. The LCA outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is</p>



Respondent (with lpr ref)	Response	Council Response
		<p>visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale's historic character and setting. The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA) by the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the Local Plan Review going forward it is no longer proposed to allocate the site.</p>
North Wessex Downs AONB (lpr1629)	EMP5 (land west of Ramsbury Road, Membury Industrial Estate) - The largest industrial site within the AONB occupied by large warehouses. It is a logical extension merging the two existing employment sites, however the scale of industrial development in this open landscape would have a visual impact within this local landscape as previously raised in applications for industrial development within this gap. The gap is an important visual break as historically it formed part of the runway and until a decade or less ago still formed part of the wider runway area. A belt of trees has now interrupted this	<p>Comments noted.</p> <p>It is proposed to create separate policies for each of the employment sites. The site at Membury will be subject to criteria, which planning applications will need to follow.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for</p>

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	<p>and impacted upon the open character of the local landscape. Should demonstrate that there is no other alternative. The nearby Lambourn woodlands site appears to be underutilised and provides the LPA with an opportunity to regenerate. The existing lane which provides access to the industrial site is not suitable for heavy industrial use, any alteration or widening would alter the character of this rural lane to the detriment of the AONB.</p> <p>Seek deletion of the expansion. But if the LPA wishes to continue with this allocation, we would strongly advise that additional landscape sensitivity assessments are carried out. It would also be prudent for the council to produce a masterplan plan for the area, which provides long term aspirations and sets out objectives/vision for the site whilst outlining height parameters, landscaping, materials and lighting.</p>	<p>a number of sites in the LPR. Membury Protected Employment Area (renamed Designated Employment Area (DEA) through the LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02979/OUTMAJ). It is considered such recommendations must be followed, and the policy will list</p>

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		criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.
Basingstoke and Deane Borough Council (lpr1483)	<p>It is also noted that additional employment allocations are proposed close to the borough boundary at Easter Park near Aldermaston and on Paices Hill (Policy SP21). Given these sites' proximity to BDBC, it would be important to ensure these would not result in any highways impacts upon Tadley or other roads in north Hampshire.</p> <p>BDBC is keen to continue to engage in suitable discussions under the Duty to Cooperate, in relation to the issues set out above and those discussed at our meeting in late 2020.</p>	<p>Comments noted.</p> <p>WBDC have engaged with BDBC in a Duty to Cooperate meeting in late 2020 and continue to keep dialogue open.</p> <p>It is no longer proposed to allocate the sites at Easter Park and north and south of Youngs Industrial Estate due to their location within the DEPZ.</p>
Thatcham Town Council (lpr1405)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>We note that Colthrop Estate has an allocation of land for industrial, storage and distribution. We are unclear if the purpose of this allocation is for logistics - in which case the employment may be relatively low - or for other purposes.</p> <p>We recognise the new employment area of Theale and acknowledge the good rail connectivity from Thatcham. Nevertheless, the restricted access and parking at Thatcham Station is also likely to lead to many new residents commuting by private vehicle. As we note elsewhere, active travel (from the new development to the station) will not be suitable for everybody. Therefore, it will be important that the Traffic Assessment fully considers the new employment areas in future predictions.</p>	<p>Comments noted.</p> <p>The allocation at Colthrop seeks B2 and/or B8 use (General Industrial, and Storage and Distribution), and not purely focused on logistics.</p> <p>It is not proposed to allocate the employment site at Theale going forward in the Regulation 19 version of the LPR, owing to recommendations from the landscape assessment.</p>
Lambourn Parish Council (lpr1445)	<p><b>Context:</b> The Membury Protected Employment Area (renamed Designated Employment Area in the new Local Plan) is made up of 8 parcels of land in Lambourn Woodlands (see attached map). In WB, DEA land is designated for particular B-class business uses. (It is not clear how the recent reclassification to E Class use of some B uses will impact the DEAs) Two of the largest DEA sites lie adjacent to (but do not include) the Membury</p>	<p>Comments noted.</p> <p>In response to Emerging Draft site EMP5 (Land west of Ramsbury Road, Membury Industrial Estate): Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a</p>

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	<p>Service areas. Whilst they straddle the motorway, it is a 7 km journey to Junction 14 of the M4. The route is along country roads (mainly Ramsbury Road) and the B4000 (Ermin Street), none of which have pavements, and which are on the West Berkshire Freight Route Plan (2009) as local access routes. The nearest District access route to key destinations and a strategic lorry route for through HGV traffic is at Junction 14 of the M4.</p> <p>Membury DEA has evolved over the past 60 years since the closure of the WW2 airfield. Lying within the North Wessex Downs AONB, its patchwork of sites fits with the characteristics of the varied landscape pattern, described in West Berkshire's Landscape Character Assessment (2019) as <i>Mixed farmland, divided into large-scale fields bound by mature hedgerows and broken up by blocks of woodland. The character area (LCA WD1. Shefford Wooded Downland) has a mosaic of arable and pasture farmland, as well as large blocks of woodland.</i></p> <p>The businesses established in the existing DEA are a mixture of sizes, from small to large, and include offices, workshops, small, light industrial premises, open storage, chemical manufacture, warehouses and distribution centres. Several have been there for many years. They have been, in general, good neighbours to the community at large and to local residents, keeping their sites tidy and obeying the terms of their planning consents, especially those referring to operation times. Residents within and adjacent to the DEAs accept that their community includes the businesses and they understand that during working hours, there will be traffic movements and other factors associated with commercial operations, but in the early mornings and evenings, and for most of the weekends, the lanes around the sites will be quiet enough for them to walk dogs, run, ride horses or cycle, enjoying the tranquillity of the AONB.</p> <p>Over the last 10 years, especially in the last 5 years, changes have occurred. Businesses have expanded and practices have changed. Increasingly, HGVs, rather than vans, and many more of them, are the vehicles using the roads. Occupants of the sites have changed, sometimes very rapidly. Businesses require lights for later operating and security. New tenants of the DEA operate noisy refrigerated trucks, 24-hour breakdown businesses, or build hard standings for open storage or parking. Units appear to have been sub-let. Planning condition restrictions on traffic</p>	<p>Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected Employment Area (renamed Designated Employment Area (DEA) through the LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02979/OUTMAJ). The policy will list criteria, as recommended in the LCA.</p>

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	<p>movements are ignored by some firms and their clients, and weekends can be as busy as weekdays. Trucks enter and leave sites in the early hours of the morning or park up on the narrow roads. Local residents come across dumped human waste. All non-motorised road users often have to dodge HGVs and, without pavements, there are few places to take refuge. WB Highways have been unable to deploy traffic monitoring equipment at relevant points on Ramsbury Road because it is too dangerous; in several places the roads are too narrow for two HGVs to pass; access to the sites along Ramsbury Road is dangerous for pedestrians and cyclists and at least one company uses a firm to bus in employees (who come from Reading and Swindon). Residents of the Woodland settlements have to drive to the local social club in Woodlands St. Mary because, with no pavements and more HGVs, it is too dangerous to walk. Public transport is limited. The nearest bus stop is on Ermin Street and the bus, to Newbury, runs once a day. Planning conditions do not appear to be enforced, despite residents' repeatedly expressed concerns over several years, both to the relevant businesses and West Berkshire Council. WBC does not have enough enforcement officers to ensure the terms are adhered to and, it appears, no knowledge of exactly who operates within the DEA.</p> <p>Residents' resistance to further expansion of the DEA is understandable. In December 2019, the Parish Council objected to planning application 19/02979/OUTMAJ, for the erection of a new logistics warehouse building, on the grounds that it was unacceptable in the AONB (too big; visual impact), additional vehicle movements, and the PEAs should not be joined up with the loss of open spaces.</p> <p><b>The proposed extension to Membury (EMP5):</b> The land designated as LAM6 in the HELAA, EMP5 in the Local Plan Review, is within the North Wessex Downs AONB. AONBs have statutory protection under the Countryside and Rights of Way Act 2000, and the National Planning Policy Framework 2019 states (paragraph 172): <i>Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.....The scale and extent of development within these designated areas should be limited".</i> This does not preclude development, but it does require that the need for</p>	<p>The ELR examines sites which were promoted as part of the call for sites, and were assessed through the HELAA from a property market point of view. The ELR (2020) recommended that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could be extended at the Membury Estate.</p> <p>As part of the planning application the Highways Authority did not object on highway capacity grounds, though were concerned regarding the location of the site and its sustainability.</p> <p>The Employment Land Review (ELR) uses up to date information about occupancy and vacancy, using market information from Co-Star. The authors of the ELR also engaged with key business representatives in the District to understand the market position.</p> <p>The market will decide on the types of units proposed on the site. The extension of the Protected (Designated) Employment Area would not necessarily be able to require that proposals are small-scale, but is something that could be encouraged, and is evidenced in the ELR.</p>

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	<p>development should be assessed - for its impact on the local economy, the scope for development outside the AONB and <i>any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be modified.</i></p> <p>The authors (Stantec) of the Economic Land Review acknowledge the impact on the AONB is a major policy constraint on the extension to Membury and note: <i>Immediately to the rear (west) of the main estate is land used for testing by TRL and also areas of open storage. This area would make a logical extension of the main Membury Industrial Estate</i> This land is already within the DEA and could be used to help fill the gap in WBC's economic land allocation by more efficient use of existing employment land. This would allow some expansion without enlarging the DEA still further.</p> <p>The impact of development on the AONB is addressed in the <i>North Wessex Downs AONB Management Plan 2019 – 2024</i>. The NWD AONB will <i>oppose forms of development that fail to conserve and enhance the character and quality of the AONB and its setting {DE01}</i> Further concerns include noise generation {DE07}, light pollution {DE08}. The AONB will <i>resist developments that would substantially increase traffic volumes in sensitive areas</i>. The AONB will <i>support local businesses which employ local people; provide services to improve the local quality of life; spend money locally; promote community cohesion; have a smaller environmental footprint (by reducing the transportation of goods from across communities)</i>.</p> <p>Expanding the Membury DEA for warehousing and distribution does not accord with the final point, especially as the ELR assessment of the site is that the demand is low and that such businesses prefer to be nearer the M4/A34 junction. Furthermore, regarding the Membury DEA, <i>there is evidence of more local demand for industrial space coming from small businesses servicing the local market</i>. Some of that local demand might be accommodated in the empty and soon-to-be-redeveloped units on the Lambourn Business Park (Lowesden Works), or even on the Hadley Farm site. This is not in the DEA, but has planning permission for 1,678 sqm for commercial use. Stantec do not seem to have noted either planning application.</p> <p>Due to the proximity of EMP5 to the existing DEA, it is tempting to assume its development would merge into the existing landscape. This is not the</p>	

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	<p>case. The site is an integral part of the patchwork of agricultural land and woodland described in West Berkshire's Landscape Character Assessment (2019) as <i>Mixed farmland, divided into large-scale fields bound by mature hedgerows and broken up by blocks of woodland. The character area (LCA WD1. Shefford Wooded Downland) has a mosaic of arable and pasture farmland, as well as large blocks of woodland.</i></p> <p>The nearby industrial sites are largely shielded by mature planting. As one emerges from the trees along the Ramsbury Road, the fields open up on either side of the road, blending into the open countryside to the east. The impression is of space and reflects the openness of the former military airfield as well as the wider downland. Building into this space would link four existing DEA sites, making a continuous line of industrialisation, running from north of the motorway to the Walker Logistics buildings, impacting not only the landscape character, but also on the setting of the group of houses from the Grade II Lyckweed Farm to Lye Farm Cottages. The special, rural character of this area, with its scattered buildings interspersed with wider countryside, woodland and farmland, would be lost. The West Berkshire Landscape Character Assessment (2019) warns that <i>Pressure for further development (in LCA WD1) may lead to development which is out of character with the existing sparsely settled character of the small hamlets and suburbanising features being introduced which may detract from the rural qualities of the area.</i> It suggests a Landscape Strategy which ensures <i>that changes in the landscape including land use change and development are sensitively sited and designed so as not to detract from the special qualities of the landscape.</i></p> <p>The Landscape Character Appraisal, undertaken to inform the emerging Lambourn Neighbourhood Development Plan, has suggested a local landscape character area, within the Shefford Wooded Downland LCA, based on Membury Airfield (LCA3). It recommends that to help plan, manage and protect the distinctiveness of LCA3, <i>The scale and planning of development at this location needs much careful consideration of any further growth to help avoid further change in character.</i></p> <p>Incorporating EMP5 into the Membury DEA would have a major impact on the landscape character of the AONB and additionally seems to contradict WBC's proposed Spatial Policy 2:</p>	

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	<p><i>Development will respond positively to the local context, conserving and enhancing local distinctiveness, sense of place and setting of the AONB. The strong sense of remoteness, tranquillity and dark night skies, particularly on the open downland, should be preserved.</i></p> <p>LAM6 was promoted for B8 storage and distribution in the HELAA, but was ruled out from further assessment due to the site being considered unsuitable. The reason for this, apart from the site being outside the DEA, was concern over highway impacts.</p> <p>The comments regarding highways and access state: <i>There is increasing concern regarding traffic levels especially HGVs impacting on Membury and the B4000 Ermin Street. Highways will object to this proposal on these grounds, and more importantly the site is within a location that is unsustainable that can only be reached by motorised vehicle.</i></p> <p>Further to this, a comment from Highways Development Control was made in August 2020 in a response to planning application 19/02979/OUTMAJ. (The application was made in November 2019 by the promoters of LAM6 and refers to part of LAM6. It is still pending a decision.): <i>It has been policy of the Highways Development Control for some time to try and resist expansion of the Membury Industrial Estate due to how unsustainable the location is. I consider that if the Climate Emergency is to be taken seriously then this proposal should be resisted.</i> (Paul Goddard, Highways Development Control Team Leader)</p> <p>Detailed, long-term travel plans for any development might reduce sustainability issues, but they will not address the increase in traffic to distribution centres. Furthermore, given the problems WBC have with enforcing planning conditions, or maintaining accurate information about site occupants, we are not persuaded that such mitigation will actually work.</p> <p>Findings from the Residents' Survey conducted for the emerging Lambourn Neighbourhood Plan suggest that most respondents would welcome smaller business units to encourage growth within the local economy and do not wish to see large developments.</p> <p>The evidence presented in the Local Plan Review does not convincingly support the economic need for a B8 development on this site. It is more likely to bring employees in from outside the district than to offer employment locally.</p>	



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	<p>The impact of such a development would adversely affect the NWD AONB, which is protected both by statute and WBC's own policies. The development is not sustainable and could actually lead to an increase in carbon emissions.</p> <p>Seek the removal of the proposal to include EMP5 as a DEA extension and a more efficient use of existing land within the Membury DEA. The inclusion of accurate information about available land would increase the number of small business units and reduce the need for extra employment land.</p>	
Stratfield Mortimer Parish Council (lpr406)	Support the policy.	Comments noted.
Theale Parish Council (lpr1102)	<p>Do not support the policy.</p> <p><b>Theale's character</b> Theale is a historic village with its own rural identity. Its location entails strong rail and road links, making it an excellent location for businesses. However, this presents a risk to the village's character and makes it vital to keep the two areas separate. The allocated and proposed sites for development listed below bely this.</p> <p><b>Allocated employment area off Hoad Way (EMP6)</b> The draft Local Plan lists this site as 'an additional site north of Arlington Business Park' (p. 19). This designation is misleading. The A4 delineates a clear boundary between Arlington Business Park and the main village. Allowing the business area to encroach on the north side of the A4 would significantly alter the character of the village. The allocated area also sits at the end of Theale's historic High Street and borders residential properties.</p> <p>Any development on this site would have inadequate access. Lorries would access the site via Hoad Way and the main roundabout on the A4. Entering this roundabout from Hoad Way is dangerous at present; forcing large vehicles to do the same will make the situation more perilous. It would also increase congestion on the High Street. Given the lack of pedestrian</p>	<p>Comments noted.</p> <p>Further landscaping work has been commissioned (Landscape Sensitivity and Capacity Assessments - LCA). It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. The site is separated from the existing Protected Employment Area by the A4. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>

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	<p>crossing at the eastern end of the High Street, this would increase the risk of an accident.</p> <p>Lastly, the allocated site would have an adverse effect on ecology. The present site is rich in wildlife, including an array of birds, deer and hedgehogs. It is also a flood plain. Any development on the land would need to address the need for adequate drainage to alleviate flooding.</p>	
Aldermaston Parish Council (lpr1058)	<p>APC strongly opposes extensions to existing DEAs at the former Youngs Garden Centre, Easter Park and Youngs Industrial Area primarily on the grounds that it will result in an increase in traffic, including particularly damaging HGVs, passing through the Conservation Area of Aldermaston Village and over the single-lane lifting bridge in Aldermaston Wharf. The area has very little public transport so all employees and clients of any new businesses would rely on private transport in and out of an area that already is already served by a significant quantity of commercial/industrial space and associated employment. Many dwellings in the Aldermaston Conservation Area are Listed and have insufficient foundations. The A340 is carrying far more traffic than it used to, and this is leading to structural damage to the properties. A relief road taking the HGVs away from Aldermaston Village is urgently required, and APC has recently adopted a policy of opposing all developments that would lead to additional HGVs passing through the Conservation Area until this issue is resolved. We believe the new APC policy is consistent with the proposed WBC Policies DC7 Air Quality and DC8 Conservation Areas as well as the more general SP9 Historic Environment.</p>	<p>Comments noted.</p> <p>It is no longer proposed to allocate the three sites in Aldermaston, following advice from Emergency Planning due to their location within the DEPZ.</p>
Hungerford Town Council (lpr143)	<p>Agree with the proposed policy.</p>	<p>Comments noted.</p>
Shaw-cum-Donnington Parish Council (lpr215)	<p>Agree with the proposed policy. We not the inclusion of the Vodafone Campus as a Designated Employment Area. We would resist any change of this site to residential use.</p>	<p>Comments noted.</p>

Respondent (with lpr ref)	Response	Council Response
Chilton Foliat Parish Council (lpr1385)	<p>Does not agree with the proposed policy. Chilton Foliat Parish Council wish to place on record our deep opposition to the extension of the Designated Employment Area at Membury.</p> <p>The village of Chilton Foliat lies just over the county boundary in Wiltshire, on the B4192 from Hungerford to Swindon and, at the centre of the village, has a junction with the B4001 which commences in the village and heads north to its junction with the B4000.</p> <p>Over the last few years there has been a big increase in the amount of HGV traffic using the B4001, much of it connected with the existing industrial areas at Membury. This road is clearly unsuitable for such traffic, being in parts effectively a single width road. In addition, and most concerning to the residents of Chilton Foliat, the exit onto the B4192 is narrow, without footpaths, with limited visibility and flanked by two private houses, both listed buildings. On many occasions HGVs have had great difficulty making the turn successfully and several times these manoeuvres have resulted in damage to the buildings and, in addition, to the footpath on the B4192 opposite the junction. See photographs attached to this submission.</p> <p>Chilton Foliat Parish Council have lodged an objection to a development of one logistics company on the existing site (19/02979/OUTMAJ) and we await the result of the planning application. We believe that our concerns should be taken into consideration and that the application should be rejected.</p> <p>We are in the process of having the B4001 signed as unsuitable for HGVs although, of course, this designation has no legal force and, whilst we are hopeful that this will make a difference to our village, that is by no means certain.</p> <p>Our opposition to the extension of the DEA at Membury is simply that this will inevitably result in an increase of large vehicles along the B4001, thus compounding the already serious issues the residents of the village are facing.</p>	<p>Comments noted.</p> <p>The Highways Authority comment that there is capacity on the local highway network to accommodate the additional floorspace.</p> <p>A Transport Assessment would be required as part of a planning application, which would examine highway capacity and identify any mitigation.</p> <p>At 6.5.11 of the Council's Local Transport Plan it states that 'Opportunities will be sought to reduce the impact of transport on the environment and tranquillity of the AONB. This will include managing freight to ensure that, where possible, through freight movements remain on the strategic road network, and that local freight deliveries use appropriate routes outlined on the Freight Route Network. The Council will work with the Highways Agency, Network Rail, and the train operating companies to minimise the impact of strategic transport networks on the AONB.' As the site is on the Freight Route this should be followed through and communicated with visitors to the site, particularly HGV users, through a travel plan and by communication between the site operator and the haulage operator/any other visitors. Such a travel plan will form part of the policy requirement.</p> <p>It is noted that a weight restriction exists on the B4001 heading south towards Chilton Foliat.</p>

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	<p>We therefore request that this expansion not be approved or, if regrettably it is approved, that legal means such as a length restriction be introduced to prevent HGVs from using the B4001 as a short cut to Hungerford and beyond.</p>	
<p>Lambourn Neighbourhood Development Plan Steering Group (lpr1707)</p>	<p>EMP5 - The LNDP welcomes the opportunity to comment on West Berkshire's Local Plan Review. We have based our comments on our findings from the Residents' Survey undertaken by the LNDP as well as recognizing and embracing the need to further develop employment opportunities locally. The Landscape Character Appraisal for the emerging Lambourn Neighbourhood Development Plan includes a local Landscape Character Area, within the Shefford Wooded Downland LCA, based on Membury Airfield (LCA3). It recommends that to help plan, manage and protect the distinctiveness of LCA3, <i>The scale and planning of development at this location needs much careful consideration of any further growth to help avoid further change in character.</i> Although recognised as an area of low demand, with constraints of being in an AONB. with a few Heritage Sites and Conservation Areas we would actively encourage the development of small local enterprise as we want the Parish to be a place where people want to live and work, as well as continuing to strengthen and the develop the Racing Industry within the Valley and the cluster industries that surround it. In the plan there is an intention to extend the DEA at Membury, this is one area where we believe there is little evidence to support the expansion, that would not have a detrimental impact on the rural character of the area and the AONB. We have seen much development of the existing compact Membury site and have witnessed a marked increase of HGV'S and other large transporters to the area, any further development in this area would be unsustainable. Other areas within the Parish are Lowesdon work, the Membury Business Park, Hurst Farm, Hadley Farm, and the Membury Business Park. These sites are spread out along Ermin Street and Ramsbury Road and sit amongst the open green spaces within the AONB - the importance of maintaining the</p>	<p>Comments noted.</p> <p>The Employment Land Review (ELR, 2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers. Table 4.21 (at paragraph 4.109) highlights that no units are available (total stock of 46 units), reflecting the small size of the industrial market in this location.</p> <p>At paragraph 4.113 the ELR (2020) highlights that there are no obvious development opportunities, with redevelopment at existing sites being the main sources of development.</p> <p>At paragraph 4.164, the ELR (2020) recommends that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury.</p> <p>There is little development in the pipeline in the Western half of the District (paragraph 6.17).</p>

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	<p>balance between the spread-out Hamlets and Industry is key as we do not want to lose the vistas and open spaces.</p> <p>Four of the above-mentioned sites offer opportunities for small local enterprise in keeping with the North Wessex Downs AONB Policy, two are yet to be redeveloped, but have acquired planning consent (Hadley Farm and Lowesdon Works) whilst Membury Business Park has several units unoccupied, as does Ariel Business Park.</p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth is predominantly in the East of west Berkshire-not in the West where this sloe is located.</li> <li>• There is poor road access to the M4. The distance from Membury to Junction 14 is 7kms, mainly along unclassified rural lanes and the B4000 (Ermin Street), none of which have pavements.</li> <li>• The proposed site is located within the Area of Outstanding Natural Beauty and previously additional development in this area has been deemed unsustainable by both West Berkshire Council's own Highways and Environmental Planning experts. This year the annual AONB Conference (29/01/21) again stressed the importance of protecting and conserving these areas. Plans to encroach on these areas need to have a major economic benefit and must have considered alternative sites. Within the WBC Employment Land Review (ELR), alternative sites are identified, in areas where demand for this type of expansion is required, therefore the extension of EMP5 cannot be justified.</li> <li>• Over a third of all proposed industrial expansion in West Berkshire is at EMP5 in the Western area. The ELR however identifies that all major housing developments are in Newbury and the East. This leads to an imbalance between new homes and new work opportunities. In effect, people would need to commute to work which would again impact on the local road networks around Membury - which would increase the unsustainability of this site.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. EMP5 will generate significantly longer travel journeys than other sites, increasing the carbon emissions for the area, when WBC wish to reduce these in West Berkshire.</li> </ul>	<p>Membury is an example of employment spaces offered at lower price points that are attractive to the market. As a general comment, in paragraph 6.37, more land will need to be identified to ensure future economic growth is not constrained. Any future land requirement will need to be considered in terms of location as well as quantum to ensure land is delivered where the need could best be met.</p> <p>At paragraph 6.65 recognises there is continued demand for industrial space, as illustrated by the Walker Logistics planning application. To support the rural economy part of this site (6.9ha) could be considered for allocation. The site has potential to provide the smaller units (circa 500 sq m) that the market assessment identifies are in particular short supply.</p> <p>The ELR (2020) notes that the site seeks to address rural demand/local demand, and is better placed than other promoted sites in the AONB.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected Employment Area (renamed Designated Employment Area (DEA) through the LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</p>

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	<ul style="list-style-type: none"> <li>The Membury PEA (now DEA) is made up of 8 parcels of land in Lambourn Woodlands. Two of the largest DEA sites lie adjacent to the proposed extension area, (this does not include the Motorway Services). Ramsbury Road and Ermin Street (B4000) are the access routes in the main to Membury, although traffic is also travelling along the A4 and reaching the site via Chilton Foliat. The B4000 is on the WBC Freight Route Plan, but this has not been updated since 2009, and there has been a significant increase in traffic to Membury since then by HGVs as the businesses have developed on site. The EMP5 site is the industrial site furthest from an A road.</li> </ul>	<p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District, much of which are in existing settlements. The Employment Land Review notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that</p>

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		<p>there is demand for such use, with jobs created which local residents can make use of.</p> <p>Membury is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations. Furthermore, it is more beneficial to locate development near/adjacent to existing development.</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and DM4 relating to climate change and sustainable building.</p>
Newbury Town Council (lpr2254)	<p>We wish to add Newbury Showground adjacent to J13 as an additional storage and distribution area.</p> <p><b>Reason:</b> This would reduce the number of HGVs travelling into and through Newbury along the A4 from west and north in particular and enable other employment sites within Newbury to be redeveloped for commercial and industrial purposes. Junction 13 is the obvious hub for distribution networks and the Showground seems likely to undergo viability issues, as well as causing severe traffic congestion on local roads at certain times. Some light industrial and other commercial uses could also be relocated to the Showground from LRIE (possibly temporarily) while that site is redeveloped.</p>	<p>Comments noted.</p> <p>The land at Newbury Showground is to be assessed through the Housing and Employment Land Availability Assessment (HELAA). Even if found suitable, this would not replace existing employment areas (i.e. Colthrop and LRIE), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability are unknown. The A4 is part of the District's freight route and HGVs are directed to use this road.</p>
<b>General consultation bodies</b>		

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Mid & West Berkshire Local Access Forum (lpr1864)	<p>EMP3 - There is a public footpath across the county boundary in Hampshire adjacent to Site EMP3 (Land off Benyon Road, Easter Park, Aldermaston). This is a continuation of West Berkshire public footpath ALDE/5/4.</p> <p>MWBLAF recommends that a new paragraph is added to the supporting text for this policy:  <b><u>7.15 The character of the public footpath in Hampshire that is adjacent to site EMP3 should be preserved.</u></b></p>	<p>Comments noted.</p> <p>It is no longer proposed to allocate the site in the Regulation 19 version of the LPR following advice from Emerging Planning due to its location within the DEPZ.</p>
<b>Other stakeholders</b>		
West Berkshire Green Party (lpr1843)	<p>We propose adding areas adjacent to Junction 13 of the M4, and in particular the Newbury Showground as a new designated employment area. This is identified as a key infrastructure junction and policy should be to relocate the distribution centres in east Thatcham to this location which is more appropriate for HGV movement. This would allow the redevelopment of the Colthrop area into a mixed development (similar to the LRIE). It has the advantage of being within walking distance of Thatcham station giving excellent public transport links to Newbury and Reading/London. Removing HGVs from the local infrastructure would also help regenerate Thatcham as proposed in the plan.</p>	<p>Comments noted.</p> <p>The land at Newbury Showground is to be assessed through the Housing and Employment Land Availability Assessment (HELAA). If found suitable though, this would not replace existing employment areas (i.e. Colthrop), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability are unknown.</p> <p>The Local Plan would not seek to remove/relocate employment uses at Colthrop, which is recognised as being in an important strategic location for B2, B8 and E(g) uses, as highlighted in the ELR.</p> <p>Furthermore, the A4 is part of the District's freight route and HGVs are directed to use this road.</p>
Councillor Tony Vickers (lpr556)	Does not agree with the proposed policy.	Comments noted.



Respondent (with lpr ref)	Response	Council Response
	<p>We feel that Membury is not an appropriate site for further employment, because it requires too much travel for employees and goods to/from outside the area.</p> <p>We think that the Newbury Showground / M4 J13 area would be a better site for more extensive distribution, storage and certain types of light industrial employment uses. It is closer to where most employees would likely live and to the national road network. It could also provide land for a future Newbury Park &amp; Ride.</p> <p>Remove EMP5 from the table on page 74 &amp; add Newbury Showground to the list on page 75.</p>	<p>The land at Newbury Showground is to be assessed through the Housing and Employment Land Availability Assessment (HELAA).</p> <p>Membury presents a logical extension to the DEAs already in place. Travel planning will be important, though this would apply to the proposed site rather than Membury as a whole. A travel plan will be required for the proposed allocation at Membury, as set out in the site allocation policy.</p> <p>A Park and Ride scheme is not a use promoted to the Council, and so has not been assessed.</p>
Councillor Alan Macro (lpr759)	<p>Does not agree with the proposed policy.</p> <p>The Covid-19 pandemic and resulting increase in home-working means that demand for new office space is likely to be significantly reduced over the plan period.</p> <p>There is a large amount of unlet office space in Theale, including in the nearby Arlington Business Park, dating from before the pandemic. Reports in the local and property press say that Reading International Business Park, less than 9km from the site and 2km from the district boundary, is 48% vacant. There is therefore unlikely to be a demand for new office space in Theale during the plan period.</p> <p>The proposal to allocate a site for 20,000 sq m of office space in Theale (ref EMP6) is unacceptable because:</p> <ul style="list-style-type: none"> <li>• It would adversely affect the setting of Theale as viewed from the A4, M4 J12 and M4 motorway.</li> <li>• The built form of office and car parking would significantly reduce, if not eliminate, the gap between the settlements of Theale and Calcot, contrary to the requirement in policy SP1 that "the individual identities of the separate settlements within this [Eastern Spatial] area will be maintained".</li> <li>• It would adversely affect the Theale High Street conservation area.</li> </ul>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The ELR 2022 concludes that whilst the office sector in West Berkshire has been steadily shrinking over the past decade, the economic forecast predicts positive job growth over the plan period and recommends a need for a net increase in office space of approximately 51,000sqm to 2039.</p> <p>Further landscaping work has been commissioned (Landscape Sensitivity and Capacity Assessments - LCA). It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the</p>

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	<ul style="list-style-type: none"> <li>• Offices would overlook numerous homes in Hoad Way and in the High Street east of Hoad Way.</li> <li>• The site would be largely covered in built form and car parking, leaving little or no space for soft landscaping or SUDS drainage.</li> <li>• The site is in flood zone 2 and regularly suffers from surface water and groundwater flooding. This means that infiltration SUDS measures would not be possible.</li> <li>• It would generate an additional approximately 800 vehicle movements* in peak periods. This would contend with traffic to or from Theale High Street at its junction with Hoad Way. It would also contend with traffic arriving or departing the Arlington Business Park and employment areas to the south of Theale at the A4/Hoad Way/Waterside Drive roundabout in the peak periods. This would cause a significant problem for traffic leaving Waterside Drive in the evening peak that is already subject to a 164-second delay (historical traffic data for 1-4 April 2019). It would also add to existing congestion at M4 J12.</li> </ul> <p>The use identified for the site in the HELAA was “mixed use residential and employment (14,000sq,m B1 floorspace)”. Allocation for 20,000 sq.m. office space is therefore contrary to policy SP1 of this plan which states that “Allocations will be related to the role and function of settlements and <b>the development opportunities identified through the HELAA</b>”.</p> <p>* Calculated using Bracknell Forest Council's parking standard for offices of one parking space per 25 sq. m. of office space.</p> <p>The proposal to allocate 20,000 sq m. of new office space (EMP6) should be removed from the plan.</p>	<p>historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. The site is separated from the existing Protected Employment Area by the A4. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>
Councillor Howard Woollaston (lpr1345)	<p>Does not agree with the proposed policy. I strongly object to the proposed LAM 6 extension at Membury . It is ill thought out and in completely the wrong location . The Membury Industrial Estate is an historical anomaly and only there because it was a WWII disused airfield – an application now would never even be considered . Specific objections are as follows :-</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• It is in the AONB and I understand that Wessex Downs AONB have already objected strongly.</li> <li>• With the change in planning designation the consent will be for distribution units. That demand is in the East of West Berkshire not as far west as you can get and generates little local employment benefit.</li> <li>• Access from the M4 J14 involves a 14Km round trip along a brief stretch of the A339 then onto the B4000 past a nursery school then onto an unclassified road and finally onto what is effectively a country lane .</li> <li>• The growth in HGV movements along this route has been huge over recent years and any extension can only exacerbate this, with accompanying environmental impact. CO2 levels are already extremely high owing to the proximity of the M4.</li> <li>• There are fundamental errors in the Stantec report not least that there are 8 bus stops within 400 metres when there is only 1 and that has a single bus service a day. The Walker application has not been approved and is heavily opposed by a vocal opposition.</li> <li>• The location is environmentally completely unviable. Not only is there no public transport apart from one bus a day but the narrowness of the lane prevents even a cycling or walking alternative. Many of the current workers are “bussed in” from Swindon or Reading so there is little or no benefit to the local economy.</li> <li>• Some HGV traffic goes South along more country lanes across the border into Wiltshire and the small village of Chilton Foliat before joining the A4.</li> <li>• The problems caused by the existing Membury Industrial Estate are already vast with a great number of HGV movements daily and water run off issues caused by hard standing and open storage. It is already an eyesore in a rural area in the AONB and to agree to a significant increased density is in my opinion madness.</li> </ul> <p>I would strongly urge that this site is deleted from the local plan for further employment use and other more appropriate sites nearer to more major housing areas with an appropriate public transport infrastructure be revisited.</p>	<p>Employment Area (renamed Designated Employment Areas (DEA) through the LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02979/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p>

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	<p>I would strongly urge that this site is deleted from the local plan for further employment use and other more appropriate sites nearer to more major housing areas with an appropriate public transport infrastructure be revisited.</p>	<p>Use Classes B2 (general industrial) and B8 (storage and distribution) are still the use classes (offices have changed to Class E), and the site will not solely be for distribution units. There is no evidence to suggest the use will not be for local employment, even if that employment extends across into Wiltshire. It is understood, through the planning application 19/02979/OUTMAJ that some residents in Lambourn have applied for work at the existing Walkers Logistics. The Council's Economic Development team supported the application and were concerned at the prospect of the loss of Walker Logistics should the application have been refused.</p> <p>The Highways Authority has outlined that there is capacity on the local highway network, with the B4000 being part of the District's Freight Route.</p> <p>It is recognised that there are not 8 bus stops in the vicinity of the site, and has a very limited bus service. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>Even if employees are bused in, there can be smaller secondary businesses which visit employment areas, such as sandwich rounds or other mobile practitioners. Site operators could look into minibus services at lunchtimes, to</p>

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		<p>enable staff to visit services in Lambourn (part of a travel plan for the site).</p> <p>Given the comments received, the landscape advice, and the approval of the planning application, the area for development is to be concentrated to the area identified as suitable for development within the Council's landscape evidence (LCA), rather than the site submitted as part of the call for sites/HELAA.</p>
Heritage Forum (lpr82)	<p>Agrees with the proposed policy. Changes – see comments on SP20.</p>	<p>Comments noted.</p> <p>See response under Emerging Draft LPR Policy SP20 (lpr81)</p>
Yvonne Thorngate (lpr35)	<p>Why on earth would the Council grant permission to build even more offices in Theale. When Arlington Business Park is more than half empty. Surely this pandemic has changed the whole concept of working from home and many businesses will cut there cost by no longer requiring huge office buildings. Arlington Business Park has buildings that have been empty for 5 years. I know these facts to be correct as I was employed there until 2017 In fact the building I was in 1230 is still empty today 3 years after we vacated it.</p>	<p>Comments noted.</p> <p>Owing to the recommendations made in the landscape assessment the site is no longer promoted as an employment site in the Regulation 19 version of the Local Plan.</p>
Mr Martin Vile (lpr17)	<p>Does not agree with the policy. EMP6 allowing the development of the land to the north of Arlington Business Park is totally inappropriate. Even the title is misleading as Arlington Business Park is the opposite side of the A4 and this piece of land is the village side of the A4. It would be more accurate to title this: <b>Land to the east of Theale Village.</b> The site is totally unsuitable and commercial development plans have previously been refused/withdrawn on the grounds of flooding, conflict with Theale Conservation area, Overhead power lines, conservation issues. It would break the existing separation between the village and the commercial side of Theale (defined by the Theale Bypass) It would merge Theale with Calcot with no separation.</p>	<p>Comments noted.</p> <p>Further landscaping work has been commissioned (Landscape Sensitivity and Capacity Assessments - LCA). It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. The site is separated from the existing Protected Employment Area by the A4. Development</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>The impact on local housing and residents would be unacceptable and the increased traffic generated would add to the already concerning congestion getting out of Theale village onto the Bypass.</p> <p>This takes no account of the obvious change of working practices that the Covid 19 pandemic has made where office space will not be needed as much.</p> <p>There appears to be plenty of land to the south and west of Arlington that could be used for additional buildings, all on the correct "commercial" side of the bypass.</p> <p>Remove EMP6 from this plan or any other commercial development plans on the Village side of the bypass.</p>	<p>would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>
Steve Taylor (lpr39)	<p>I object to the Membury industrial land extension. The traffic levels on the B4000 are intolerable at present, let alone with further traffic. This is a B road. The pollution levels are extreme at present without any further addition. The proposed site sits in an area of outstanding natural beauty. The infrastructure is in no way geared for such an application to be acted upon. Any development would be an act of environmental vandalism.</p> <p>Find another location with suitable access and infrastructure which Membury most certainly does not have.</p>	<p>Comments noted.</p> <p>The Highways Authority has outlined that there is capacity on the local highway network, with the B4000 being part of the District's Freight Route.</p> <p>Since the publication of the Local Plan Review (LPR) further landscaping work has been undertaken. The work recognises the site's sensitive location in the AONB and location adjacent to existing industrial areas. It is proposed to limit development to a focused area, with landscape buffers.</p> <p>West Berkshire is predominately a rural district, and given the need identified in the ELR and in recognition that the site is in close proximity to the M4 Junction 14 with existing employment uses, it is considered that the site is appropriate as an allocation. Membury is listed as a key industry origin and destination, and the connecting roads are outlined as 'local access routes' in the Freight Strategy. Other sites have also been allocated, in rural locations, adjacent to existing employment areas.</p>

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		Examining the impacts of likely development of an industrial nature on air pollution has been considered by Environmental Health. It is possible that there will be an impact on air quality during construction and once operations are running. Proposed Submission LPR Policy DM5 will need to be considered.
Piers and Rachel Yeld (lpr42)	<p>We don't envy West Berks Council putting together such a long 250 page document, but it is also a mammoth task for residents to read cover to cover, with all the other lengthy supporting evidence documents. But having done this, we recognise WBC's need to forecast the County's future housing, office and industrial space requirements and a long term plan to meet those needs. However, we do not agree with its conclusions proposing an industrial land extension at Membury which WBC asserts as inevitable. We do not believe this is the case and object most strongly. Given the LRP Emerging Draft references consultants, Stantec, with their August 2020 Report conclusions on Membury, we will refer to that document also given this is the supporting evidence which WBC has used to underlie its thinking.</p> <p>First, we were astonished to see Stantec state the proposed LAM-6 site extension at Membury Estate is a foregone conclusion. It is not. Yet on Page 69 #4.113, they say planning has already been granted for this site (Walker Logistics), although development not yet started. This is untrue as Walkers' application is still to be heard in a Planning Committee hearing. Why would Stantec conclude this has been given go-ahead, even if later references in their document correct this site's status? This can only have come after WBC discussions with Stantec when Planning clearly shared their pre-determination conclusions this application would be approved.</p> <p>This is highly improper. Post a Committee Hearing, were planning to be granted, it is open to legal challenge. Given the seriousness of this assumption, we have brought this to the attention of Councillor Howard Woollaston for appropriate follow-up with WBC.</p> <p>Second, Stantec identify that AONB is the critical constraint in developing the proposed 6.9 Ha site for industrial use at Membury given local</p>	<p>Comments noted.</p> <p>The Employment Land Review (ELR) is an evidence based document, which aids in guiding business development across the District, identifying need and examining sites that were put forward through the Council's call for sites. There are other factors which also need to be taken into account by the Council, such as the AONB designation.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR (2020), and there was no direction given as to whether planning permission would be granted or not. The ELR is an evidence based document, and is a document to be taken into account in decision making.</p> <ol style="list-style-type: none"> <li>1. Carbon reduction. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> </ol>

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	<p>woodlands and rural surrounding. That is correct, but there are other ramifications in extending the DEA boundary (old PEA) at Membury.</p> <ol style="list-style-type: none"> <li>1. Continued industrialisation and the inevitable increase in pollution makes a mockery of WBC's core strategy of carbon reduction, not least in such a poor performing region as West Berkshire that is significantly worse than Reading, the South East and indeed England itself.</li> <li>2. Extending the Membury DEA also contradicts the spirit of WBC's own policy statements to protect this rural community: Environment (DC4); Air Quality (DC7); Conservation (DC8); etc.</li> <li>3. Ramsbury road is not just impractical for HGV's, it is also dangerous for local residents. Stantec admit this road is narrow, only just allowing two narrow vehicles to pass in opposite directions. Yet HGV and Lorry/Van volume continues to rise here as well as on Ermin Street to provide commercial traffic access to the M4 at Jct. 14. More expansion will generate more industrial traffic on these minor roads. This is not only noisy, disruptive and detrimental to the environment, it adds fear to the local community further increasing risks to all road users. The fact Highways refused to do a local traffic monitoring survey for safety reasons proves our point.</li> <li>4. Under Supporting the Rural Economy Policy (DC32), WBC insists that developers demonstrate no resultant inappropriate traffic happening (#viii and #ix). Yet there has been no transport assessment done to determine the true traffic impact of this site extension. Planning already refused to use national TRICS data for the Walkers application. If this Membury site expansion is considered strategic by WBC, why has no proper assessment been made?</li> <li>5. The Membury site location is dreadful and impractical. Unlike Transport Infrastructure Policy (DC35) recommendations, this area has no access by train, bus, cycle or foot because of the inherent traffic risks which WBC Highways have already identified. Motor vehicles are the only way in and out of this site making it completely unsustainable. Stantec state there are "8" bus stops within a 400 m radius in their appendices (page 119 #23, and page 125 #29) which</li> </ol>	<ol style="list-style-type: none"> <li>2. Road network. As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as 'local access routes' in the Freight Strategy.</li> <li>3. Transport assessment – any planning application will be required to submit a Transport Assessment. As outlined above, there has been a high level assessment undertaken by the Council's Highway Authority.</li> <li>4. Unsustainable location - The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</li> <li>5. Health Impact Assessments (HIAs) will be required under Proposed Submission LPR Policy DM3 of the LPR, as part of a submission of a planning application. Public Health were consulted as part of the Regulation 18 consultation, and were invited to comment on sites as part of the assessment for the HELAA. No comments were received in respect of the site.</li> <li>6. At paragraph 4.164 of the Employment Land Review (ELR, 2020) it is recommended that to</li> </ol>



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	<p>is also completely inaccurate. The nearest bus stop is well over a mile away, once a day service only, and unusable because of the risks of walking this unlit, HGV dominant, narrow country road.</p> <p>6. Given guidance 33 from Public Health England, why has no HIA assessment been carried out to understand the impact of industrial expansion on the local rural community? Given these surroundings are also home to the equine industry, the health and safety of valuable racehorses and associated workers who live and drive in the area, are also impacted and put at risk.</p> <p>7. Stantec's report recommends on page 115 #7.10 top-up land at Membury would meet target and help address local rural demand, yet they provide no evidence for this. On page 118 #17 they also talk of local demand for industrial space from small businesses to service local markets. Again, with no evidence, why would these conclusions be accepted as valid?</p> <p>In conclusion, we urge WBC to think their plans through again as we believe they are ill-judged and would be intolerable to residents and the local community if carried out.</p> <p>Withdraw the LAM-6 site from further discussions given this is a wholly inappropriate location.</p> <p>Rather explore Stantec's recommendation on page 119 #26: "immediately to the rear (west) of the main estate is land used for testing by TRL and also areas of open storage". While no land area number is given, they claim this would be a "logical extension of the main Membury Estate". Given that smaller parcel of land exists within the current PEA, those couple of hectares makes the case for that development a little more persuasive as it reuses existing industrial land.</p> <p>To reach WBC's target of 16 hectares of additional Industrial Land by 2037, 12.7 hectares are already identified at Aldermaston and Tadley. Topping that up using Membury's existing site closes that gap to meet target. Given the target is anyway a long-term guesstimate, this small % shortfall would be well within a reasonable margin of error over the 16 year timeframe.</p>	<p>support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury. The site would aid in meeting rural market demand, which has been demonstrated through the submission of a planning application for the expansion of Walker Logistics.</p> <p>As a result on further landscape assessment the developable area would be on a focused part of the site with landscape buffers.</p>

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Alexander Anderson (lpr48)	<p>I wish to object to the industrial development in the Membury area. As a local resident I am convinced that the local road provision is inadequate to allow for further development at this site.</p> <p>I cannot express my objection any more eloquently than the transcript below: <i>[repeats representation lpr42]</i></p> <p><u>Do you agree with the proposed policy/site allocation or approach?</u> YES NO: X</p> <p><u>What are your reasons for supporting or objecting?</u></p> <p>We don't envy West Berks Council putting together such a long 250 page document, but it is also a mammoth task for residents to read cover to cover, with all the other lengthy supporting evidence documents.</p> <p>But having done this, we recognise WBC's need to forecast the County's future housing, office and industrial space requirements and a long term plan to meet those needs. However, we do not agree with its conclusions proposing an industrial land extension at Membury which WBC asserts as inevitable. We do not believe this is the case and object most strongly.</p> <p>Given the LRP Emerging Draft references consultants, Stantec, with their August 2020 Report conclusions on Membury, we will refer to that document also given this is the supporting evidence which WBC has used to underlie its thinking.</p> <p>First, we were astonished to see Stantec state the proposed LAM-6 site extension at Membury Estate is a foregone conclusion. It is not. Yet on Page 69 #4.113, they say planning has already been granted for this site (Walker Logistics), although development not yet started.</p> <p>This is untrue as Walkers' application is still to be heard in a Planning Committee hearing. Why would Stantec conclude this has been given go-ahead, even if later references in their document correct this site's status? This can only have come after WBC discussions with Stantec when Planning clearly shared their pre-determination conclusions this application would be approved.</p> <p>This is highly improper. Post a Committee Hearing, were planning to be granted, it is open to legal challenge. Given the seriousness of this assumption, we have brought this to the attention of Councillor Howard Woollaston for appropriate follow-up with WBC.</p>	<p>Comments noted.</p> <p>The Employment Land Review (ELR) is an evidence based document, which aids in guiding business development across the District, identifying need and examining sites that were put forward through the Council's call for sites. There are other factors which also need to be taken into account by the Council, such as the AONB designation.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <ol style="list-style-type: none"> <li>1. Carbon reduction. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>2. Road network. As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as 'local access routes' in the Freight Strategy.</li> <li>3. Transport assessment – any planning application will be required to submit a Transport Assessment.</li> </ol>

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	<p>Second, Stantec identify that AONB is the critical constraint in developing the proposed 6.9 Ha site for industrial use at Membury given local woodlands and rural surrounding. That is correct, but there are other ramifications in extending the DEA boundary (old PEA) at Membury.</p> <ol style="list-style-type: none"> <li>1. Continued industrialisation and the inevitable increase in pollution makes a mockery of WBC's core strategy of carbon reduction, not least in such a poor performing region as West Berkshire that is significantly worse than Reading, the South East and indeed England itself.</li> <li>2. Extending the Membury DEA also contradicts the spirit of WBC's own policy statements to protect this rural community: Environment (DC4); Air Quality (DC7); Conservation (DC8); etc.</li> <li>3. Ramsbury road is not just impractical for HGV's, it is also dangerous for local residents. Stantec admit this road is narrow, only just allowing two narrow vehicles to pass in opposite directions. Yet HGV and Lorry/Van volume continues to rise here as well as on Ermin Street to provide commercial traffic access to the M4 at Jct. 14. More expansion will generate more industrial traffic on these minor roads. This is not only noisy, disruptive and detrimental to the environment, it adds fear to the local community further increasing risks to all road users. The fact Highways refused to do a local traffic monitoring survey for safety reasons proves our point.</li> <li>4. Under Supporting the Rural Economy Policy (DC32), WBC insists that developers demonstrate no resultant inappropriate traffic happening (#viii and #ix). Yet there has been no transport assessment done to determine the true traffic impact of this site extension. Planning already refused to use national TRICS data for the Walkers application. If this Membury site expansion is considered strategic by WBC, why has no proper assessment been made?</li> <li>5. The Membury site location is dreadful and impractical. Unlike Transport Infrastructure Policy (DC35) recommendations, this area has no access by train, bus, cycle or foot because of the inherent traffic risks which WBC Highways have already identified. Motor vehicles are the only way in and out of this site making it completely</li> </ol>	<p>As outlined above, there has been a high level assessment undertaken by the Council's Highway Authority.</p> <ol style="list-style-type: none"> <li>4. Unsustainable location - The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</li> <li>5. Health Impact Assessments (HIAs) will be required under Proposed Submission LPR Policy DM3 of the LPR, as part of a submission of a planning application. Public Health were consulted as part of the Regulation 18 consultation, and were invited to comment on sites as part of the assessment for the HELAA. No comments were received in respect of the site.</li> <li>6. At paragraph 4.164 of the Employment Land Review (ELR, 2020) it is recommended that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury. The site would aid in meeting rural market demand, which has been demonstrated through the submission of a planning application for the expansion of Walker Logistics.</li> </ol>

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	<p>unsustainable. Stantec state there are “8” bus stops within a 400 m radius in their appendices (page 119 #23, and page 125 #29) which is also completely inaccurate. The nearest bus stop is well over a mile away, once a day service only, and unusable because of the risks of walking this unlit, HGV dominant, narrow country road.</p> <p>6. Given guidance 33 from Public Health England, why has no HIA assessment been carried out to understand the impact of industrial expansion on the local rural community? Given these surroundings are also home to the equine industry, the health and safety of valuable racehorses and associated workers who live and drive in the area, are also impacted and put at risk.</p> <p>7. Stantec's report recommends on page 115 #7.10 top-up land at Membury would meet target and help address local rural demand, yet they provide no evidence for this. On page 118 #17 they also talk of local demand for industrial space from small businesses to service local markets. Again, with no evidence, why would these conclusions be accepted as valid?</p> <p>In conclusion, we urge WBC to think their plans through again as we believe they are ill-judged and would be intolerable to residents and the local community if carried out.</p> <p><b><u>What changes are you seeking/what would be your preferred approach?</u></b></p> <p>Withdraw the LAM-6 site from further discussions given this is a wholly inappropriate location.</p> <p>Rather explore Stantec's recommendation on page 119 #26: "immediately to the rear (west) of the main estate is land used for testing by TRL and also areas of open storage". While no land area number is given, they claim this would be a “logical extension of the main Membury Estate”. Given that smaller parcel of land exists within the current PEA, those couple of hectares makes the case for that development a little more persuasive as it reuses existing industrial land.</p> <p>To reach WBC's target of 16 additional Industrial Land hectares by 2037, 12.7 hectares are already identified at Aldermaston and Tadley. Topping that up using Membury's existing site closes that gap to meet target. Given</p>	<p>As a result on further landscape assessment the developable area would be on a focused part of the site with landscape buffers.</p>

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	the target is anyway a long-term guesstimate, a small % shortfall would be well within a reasonable margin of error over the 16 year timeframe.	
Mrs Helen Marek (lpr58)	<p>Does not agree with the proposed policy. Theale is no longer a village. There have been so many planning applications granted over the past few years that should not have been granted.</p> <p>The planning applications to build on land between the north end of Theale High Street and the M4 are totally unacceptable. The application for 170 houses would stretch limited resources, e.g. for The Medical Centre, beyond capability. The application to build offices on land which is highly susceptible to flooding is preposterous and consequently puts houses in that area in greater risk of being flooded. This is a housing area, not an industrial estate.</p> <p>The above applications should NOT be granted. Offices should be put on the other side of the A4 in the Industrial estate, not in the housing area.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscape evidence recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>
Ms Zoe Freedman (lpr62)	<p>Does not agree with the proposed policy. I am objecting to the potential 20,000sq metres of office space to be built in Theale (EMP6). I think this needs to be seriously reconsidered given the fundamental changes to working patterns that have come about with the pandemic.</p> <p>There are also other reasons to object about this site in particular:</p> <ol style="list-style-type: none"> <li>1. It would reduce the gap between Theale and Calcot</li> <li>2. Risk from fluvial, surface water and ground water flooding</li> <li>3. Separated from the Arlington Business Park by the busy A4 Theale bypass.</li> <li>4. Overhead high voltage power lines and an electricity pylon.</li> <li>5. Impact on the Theale High Street Conservation Area.</li> <li>6. Impact on surrounding housing</li> </ol> <p>I think we do not need more office space at this time. That is not the future of work since the pandemic hit.</p>	<p>Comments noted.</p> <p>Further landscaping work has been commissioned (Landscape Sensitivity and Capacity Assessments - LCA). It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. The site is separated from the existing Protected Employment Area by the A4. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot.</p>

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		<p>It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>
<p>Dame Theresa Sackler (lpr138)</p>	<p>I have many concerns about the draft Local Plan but most of all with regard to the proposal to increase the industrial area at Membury by a sizeable 6 hectares. This will not be without significant impact to the immediate and wider area of the county. There are a myriad of reasons why this expansion should not be allowed including issues of access, road safety and increased levels of traffic and pollution. I do not support this plan and would ask that either an alternative location is sought or permission is simply not granted. I hope that the Planning Committee (with advice from Stantec) will be ultra-diligent in their review of the burgeoning number of planning permission proposals. It is imperative that we all work together to properly protect the environment/neighbourhood, and agree on a Local Plan for the that is sensitive to the current and future needs of our countryside and its communities.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected Employment Area (renamed Designated Employment Areas (DEA) through the LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside.</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to</p>

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		<p>integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02729/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>Alternative locations have been explored by the Employment Land Review (ELR) and as part of the Housing and Economic Land Availability Assessment (HELAA) and it is considered that the site would be a logical extension to the existing Membury Industrial Estate and would serve a rural market.</p> <p>The Highways Authority consider the local road network has capacity for the floorspace, and access can be designed to meet highway standards.</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p>
Mr Gary Miles (lpr243)	Does not agree with the proposed policy. I object to the EMP6 Land north of Arlington Business Park, Theale East Business Centre 20,000 sq foot warehouse development. Why? The meadows adjacent to Hoad Way are full of wildlife from Dear, to herons, to kites, bunnies etc. A warehouse here would be completely out of character to the rest of the village. The area sits within a conservation area. A warehouse here will inadvertently create additional traffic down Theale high street, even if the traffic should be there such as HGV's and delivery lorries - once in to the high street they will be	<p>Comments noted.</p> <p>Further landscaping work has been commissioned (Landscape Sensitivity and Capacity Assessments - LCA). It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of</p>

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	<p>committed to carry on. Likewise if the A4 bypass is busy it is likely that these same vehicles will use the high street to access the warehousing. I object because as we speak there are multiple office buildings empty within Arlington Business Park - some offices were being refurbished but have since been left and forgotten! There is the large DVLA building in Station Road which is still empty for the past 6 years with no takers, a large warehouse in Brunel Rd which is empty and has been for ages, two brand new warehouses near Station Rd built 18 months ago and still empty. Why build more warehousing if so many warehouses and commercial property is currently empty?</p> <p>I'd prefer it if the industrial buildings such as warehousing were kept to the southern side of the A4 with all the other warehousing. Don't bring warehousing in to the village - it is a conservation area which I feel is forgotten over and over again by WBC - having just fought of a 20,000 sq foot warehouse unit for the exact same location of Hoad Way.</p>	<p>coalescence with Calcot and loss of separate identity of Theale from Calcot. The site is separated from the existing Protected Employment Area by the A4. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>
Mrs Sam Coppinger (lpr59)	<p>We do not agree with the proposal for industrial land extension at Membury and object strongly.</p> <p>The LRP (Emerging Draft) references consultants Stantec with their August 2020 report conclusions regarding Membury. We refer to that document as it is supporting evidence WBC uses to inspire its thinking.</p> <p><u>Irregularity regarding the state of a Planning Application</u></p> <p>We would like to draw attention to the fact that Stantec state that the LAM-6 site extension at Membury Estate is already approved. It is not. On p69 - 4.113, they say planning has been granted for this site (Walkers Logistics) although development has not yet started. This is not true as Walker's application is yet to be heard at the Planning Committee meeting. This calls in to question due process and would indicate that Planning has shared predetermined conclusions that this application would be approved. If this application were to be approved, post hearing, its status should be open to a legal challenge. Our community team has brought this to the attention of Howard Woollaston for appropriate follow-up with WBC.</p> <p><u>AONB protected status should be barrier to development</u></p> <p>Stantec identify AONB as a critical constraint in developing the 6.9 ha site for industrial use at Membury - a very rural environment surrounded by</p>	<p>Comments noted.</p> <p>The Employment Land Review (ELR) is an evidence based document, which aids in guiding business development across the District, identifying need and examining sites that were put forward through the Council's call for sites. There are other factors which also need to be taken into account by the Council, such as the AONB designation.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <ol style="list-style-type: none"> <li>1. Carbon reduction. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the</li> </ol>



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	<p>woodland. This is true, of course, however there are many other undesirable consequences in extending the DEA (old PEA) at Membury.</p> <p><u>Pollution &amp; carbon reduction</u> Continued industrialisation and increase in pollution calls into question WBC's core strategy of carbon reduction (carbon neutral by 2030) and to 'minimise demand for energy and other resources'– especially in such a poor performing region (compared to the rest of Berkshire and South East).</p> <p><u>WBC commitment to rural community environment</u> Extending DEA at Membury contradicts essence of WBC's own policy statements to protect this rural community environment (DC4), air quality (DC7), conservation (DC8), etc.</p> <p><u>Infrastructure Unsuitability</u> Ramsbury Road is not suited to HGV traffic and is also a dangerous road for residents. The road is narrow – only just allowing two vehicles to pass in opposite directions (Stantec). HGV/lorry/van volumes continue to increase including on Ermin Street to provide commercial traffic access to J14, M4. More expansion will generate yet more traffic on these minor roads. All of this is noisy, disruptive and detrimental to the environment. These are unlit roads without footpaths - used by pedestrians; horseriders and cyclists alike – more traffic is frankly dangerous and increases the risk to life. Highways refused to undertake a local traffic monitoring survey on grounds of safety, which further underlines the point.</p> <p><u>Traffic Impact Assessment (TIA)</u> Under Supporting the Rural Economy Policy (DC32), WBC insists that developers demonstrate no resultant inappropriate traffic happening (viii &amp; ix). However, no TIA has been carried out to determine the true impact of traffic on this site extension. Planning has refused to use national TRICS data for the Walker's application. If this site extension is considered to be a strategic development by WBC – why has no proper assessment been made?</p> <p><u>No sustainable access to site</u> The Membury site location is entirely unsuitable and impractical. Unlike Transport Infrastructure Policy (DC35) recommendations, there is no access either by train or bus and no safe cycle or pedestrian routes because of the inherent traffic risks of which WBC Highways are all too aware. Motor</p>	<p>urbanisation of land. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <ol style="list-style-type: none"> <li>2. Road network. As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as 'local access routes' in the Freight Strategy.</li> <li>3. Transport assessment – any planning application will be required to submit a Transport Assessment. As outlined above, there has been a high level assessment undertaken by the Council's Highway Authority.</li> <li>4. Unsustainable location - The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</li> <li>5. Health Impact Assessments (HIAs) will be required under Proposed Submission LPR Policy DM3 of the LPR, as part of a submission of a planning application. Public Health were consulted as part</li> </ol>

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	<p>vehicles are the only way in and out of this site making it completely unsustainable. Stantec incorrectly states that there are eight (8) bus stops within a 400m radius in their appendices (p119 - 23 &amp; p125 – 29). The nearest bus stop is, in fact, well over a mile away, a once a day service only and unusable because of the risks of walking an unlit, narrow country lane that is already overused by HGVs.</p> <p><u>Public Health England – Health Impact Assessment (HIA)</u> Why hasn't an HIA been carried out to ascertain the impact of industrial expansion on the local community in and around Membury? Not only home to local residents, these surroundings are home to the equine industry. Lambourn is recognised as being a centre of excellence for the racing industry and is of huge local importance, contributing significantly to the environment and economy. Over industrialisation risks the health and safety of all involved in this industry.</p> <p><u>No evidence of rural demand</u> Stantec's report recommends p115 – 7.10 that top up land at Membury would meet the required target and help address local / rural demand, yet they provide no evidence for this. On p118 – 17, they mention local demand for industrial space from small businesses to service local markets. However, again – there is no evidence of this. These conclusions should not be deemed true.</p> <p>In summary, we would like WBC to rethink the draft plan. The impact would be intolerable to residents and the local community if carried out.</p> <p>We propose the withdrawal of the LAM-6 site from further discussions as it is not appropriate for further development.</p> <p>Stantec suggest that there is a parcel of land 'immediately to the rear (west) of the main estate... land used for testing by TRL and also areas of open storage'. This might be worth considering as it is adjacent to the existing Membury Estate and already sits within the existing PEA. More compelling, is that this is existing industrial land.</p> <p>If this parcel of land were to be added to those already being considered at Aldermaston and Tadley, it would go a long way to meeting the suggested target for industrial development.</p>	<p>of the Regulation 18 consultation, and were invited to comment on sites as part of the assessment for the HELAA. No comments were received in respect of the site.</p> <p>6. At paragraph 4.164 of the Employment Land Review (ELR, 2020) it is recommended that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury. The site would aid in meeting rural market demand, which has been demonstrated through the submission of a planning application for the expansion of Walker Logistics.</p> <p>As a result on further landscape assessment the developable area would be a more focused area, with landscape buffers.</p>

Respondent (with lpr ref)	Response	Council Response
L Bahrani (lpr2472)	<p>Object to policy.</p> <p>I wish to formally register my comments and objections in respect to the West Berkshire Local Plan Review referenced above.</p> <p>The plan, specifically the sites proposed for residential and commercial development, raises many serious concerns with respect to its impact on the village of Theale, the residents of the village, and the wider area.</p> <p>A non-exhaustive list of comments and objections is presented as follows:</p> <p><b>Conservation Area</b></p> <p>Sites identified for inclusion in the LPR (Local Plan Review) encompass those designated as a <b>Conservation Area</b> and setting, and is thus subject to protection as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance as per Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act and as designated under Article 50 of the Planning (NI) Order 1991.</p> <p>Conservation Areas are also notable for their biodiversity value. Protected species and habitats need to be addressed when reviewing buildings, sites and planning works. See further point on <b>Destruction of wildlife habitat and protected species.</b></p> <p>In addition, trees in a Conservation Area are automatically protected as if a Tree Preservation Order (TPO) was in place.</p> <p><b>Invasion of privacy of Theale residents (esp. 60-89 High Street)</b></p> <p>The overlook that will result from the sites identified for inclusion in the LPR will pose serious privacy issues especially for the surrounding properties i.e.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>60-89 High Street, Theale. As per Article 8 of the Human Rights Act states a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.</p> <p><b>Agricultural Land Classification (ALC)</b></p> <p>Natural England records that sites identified and proposed for inclusion in the LPR are graded ALC and thus the land should protected from development under the government policies and legislation to preserve the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals.</p> <p><b>Flood Risk, Ground Stability and Drainage</b></p> <p>The Environment Agency designates sites identified for inclusion in the LPR as at <b>HIGH RISK</b> from surface water flooding. The eradication of natural ground absorption inherent to this proposal will heighten this risk status for Theale village and adversely affect the foundational integrity of nearby properties and subsequently elevate Home &amp; Buildings insurance premium rates for the surrounding area.</p> <p><b>Destruction of wildlife habitat and protected species</b></p> <p>The destruction of habitation required for the sites identified and proposed for inclusion in the LPR development would lead to a further decline in wildlife species such as deer, rabbit, birds, bats and hedgehogs.</p> <p>Hedgehogs are listed as a <b>Species of Principle Importance in England</b> under the Natural Environment and Rural Communities (NERC)</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Act 2006 Section 41 making hedgehogs a material consideration for Local Planning Authorities (LPAs) during the planning process.</p> <p><b>Highway safety, inadequate parking and access</b></p> <p>Theale village is already vastly strained with traffic and parking issues; development on the sites identified and proposed for inclusion in the LPR proposal will only serve to escalate these issues and stands in direct contradiction with both government and local council policies on congestion and pollution alleviation. Parking facilities in Theale are already oversubscribed and the proposed development would lead to an increase in traffic and parking issues correlating inversely with a decrease in highway safety.</p> <p><b>Noise/Air/Light/Visual Pollution</b></p> <p>Additional development of both commercial and residential nature will increase noise, air, light and visual pollution in Theale village both during and post-construction, with particular impact on residents of 60-89 High Street and Woodfield Way as the parallel properties to two of the sites included.</p> <p><b>Loss of natural light</b></p> <p>Sites identified and proposed for inclusion in the LPR are in extremely close proximity to numerous residential properties that have benefited from natural space and light for over 20 years. The proposed development would contravene the fair and reasonable 'right to light' claim by residents resulting from the obscuration of a South-East solar trajectory.</p> <p><b>Negative alteration to the character and nature of Theale village</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The encroachment on green space and increased commercial development will erode the character of the village as a predominantly residential settlement.</p> <p><b>Requirement for Post-Pandemic Reconsideration</b></p> <p>The LPR is based on studies and requirement predictions based on a pre-pandemic environment and as such are now invalidated due to the rapidly shifting socioeconomic conditions. It is increasingly apparent that more people are now working from home thus reducing the demand for commercial office related premises which is of particular pertinence to the proposal for 20,000 sqM of office space in Theale.</p> <p><b>Excessive/Exaggerated Targeting</b></p> <p>The LPR proposes an excess of proposed residential developments beyond the targeted 520 - 575 homes per year and instead contains proposals for a pro-rata development of 599 homes per year which represents an excessive and unrealistic overreach.</p> <p>Further, the LPR allocation fails to account for the up to 500 flats West Berkshire Council intends to build in Newbury at the London Road Industrial Estate.</p> <p>In addition, the 170 homes proposed for Theale would be above the 440 homes on the western side of Theale that have been given planning permission but not yet built.</p> <p><b>Deficient Development Control Policies</b></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The development control policies relating to some sites identified for inclusion in the LPR, which include all those affecting Theale, are incomplete.</p> <p><b>Deficient Sustainability Appraisal</b></p> <p>There is current no completed sustainability appraisal of the plan which would doubtless reveal the detrimental impact to the environment due to the proposals and details contained in the LPR for the environment.</p> <p>In conclusion this LPR should be roundly rejected as it stands in direct contradiction to myriad land/heritage conservation policies and would also be to the detriment of the quality, character, safety and amenity value of the area, as outlined in the points above.</p>	
Diana Spence (lpr1024)	<p>Object to policy.</p> <p>Theale is slowly losing its village character as more homes/offices are being built. Such projects normally do not involve any provision for extra health care or sanitation. Theale has a very small GP that can barely cope with demand as it is. Traffic is increasing. Totally oppose any extra housing or offices in our village.</p> <p>Such plans should be cancelled.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>
Helen Windridge (lpr1040)	<p>We do <b>NOT</b> agree with the proposed policy/site allocation (EMP5)</p> <p><b>Reasons:</b> The proposed site is in an area of Outstanding Natural Beauty; increased traffic will have further impact on the rural quality of Ramsbury road and tranquility levels within the wider area. Increasing carbon dioxide levels in</p>	<p>Comments noted.</p> <p>It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus</p>

Respondent (with lpr ref)	Response	Council Response
	<p>West Berkshire which is the worst performing region in the whole of Berkshire, and well above South East England by 38%; LAM6 will generate significantly longer travel journeys and increase in HGV's, more than other sites thereby causing an increase.</p> <p>LAM6 is the most remote in West Berkshire and also the most inaccessible for HGV's, there is no easy access to the site and it is not close to JCT14 of the M4, so HGV's would often need to travel on minor roads and this would have an impact on on many rural communities who live on the route.</p> <p>There are many inaccuracies in the document;</p> <p>Development opportunities P74 4.113 states that planning has already been granted to Walker Logistics, which is not the case as it is still to be heard by committee amidst submissions and many objections.</p> <p>Their are also inaccuracies around the number of bus stops available in LAM6, there is only one not eight, and this has to be accessed via narrow roads, dominated by HGV's!</p> <p>It is stated that Ramsbury Rd has reasonable access with little HGV constraint, this is not so as presently many HGV's already use small lanes via Chilton Foliat to get to Membury, which is totally unsuitable.</p> <p><b>CHANGES</b></p> <p>We would like WBC to rethink LPR plans regarding industrial land extension and to find more relevant locations in the Eastern part of West Berkshire where it appears the demand for facilities lie.</p> <p><b>4.141</b></p> <p>We would like to point out that Hurst Farm (8a) is a private residence.. we live here! and that Membury Business Park is adjacent and completely separate.</p>	<p>development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Road network. As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as 'local access routes' in the Freight Strategy. Any planning application will be required to submit a Transport Assessment. As outlined above, there has been a high level assessment undertaken by the Council's Highway Authority.</p> <p>The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p>



Respondent (with lpr ref)	Response	Council Response
		<p>It is also recognised that Hurst Farm is a residential property. The adjacent employment area is called Hurst Farm Protected Employment Area/Designated Employment Area.</p> <p>As a result on further landscape assessment the developable area would be on a focused part of the site with landscape buffers.</p>
Robert Orr-Ewing (lpr1059)	<p>Does not agree with the proposed policy. We do not believe that WBC, through their consultants' Stantec, have taken sufficient account of the Area of Outstanding Natural Beauty or any account of the other considerations of the area, such as the inadequacy of the access road, the effect of the increased traffic, the lack of public transport, the likely increase in carbon emissions, and the effect on the local community, including the equine industry.</p> <p>We were also greatly concerned that Stantec appear to have believed that a LAM-6 planning application had been approved by the Council, when in fact the application has not been heard and faces substantial local opposition. This leads us to suspect that Stantec had been told by council officials that the outcome was a foregone conclusion. We hope that this is not the case.</p> <p>Expanding on the reasons for objecting:</p> <p><b>1. Have AONB been consulted?</b> This is a very attractive part of the County. Any increased industrialisation would be detrimental to the look and feel of the area.</p> <p><b>2. The access road</b> The B4000 is narrow, with many accesses to private dwellings off it. It is dangerous for cars emerging onto this road as it is. Support people, such as the postman, already take risks stopping and turning into the road. These risks would only increase.</p> <p><b>3. Lack of public transport</b> The area is not served at all by trains. There is only one bus stop over a mile away (contrary to Stantec's statement). It is not practical to have staff arriving on foot; it would be too dangerous along the B4000.</p> <p><b>4. Increased pollution</b></p>	<p>Comments noted.</p> <p>The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Increased traffic inevitably leads to increased fumes and pollution, contrary to WBC’s policy to reduce carbon emissions.</p> <p><b>5. Effect on local community</b></p> <p>Although the road is busy, it is used by cyclists and horses and by horse boxes taking horses to and from Lambourn to race meetings. Large HGVs make these activities more dangerous and risky.</p> <p>For all these reasons, the proposal should be rejected.</p> <p>We would prefer that the existing area within the industrial area as referred to on page 119 of Stantec’s report.</p> <p>We would also recommend using the areas at Aldermaston and Tadley referred to in the report, and feel that they are adequate for WBC’s purposes.</p>	<p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <ol style="list-style-type: none"> <li>1. The AONB Board has been consulted. The response to the Regulation 18 consultation is included within this document.</li> <li>2. As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as ‘local access routes’ in the Freight Strategy.</li> <li>3. It is acknowledged that there are few alternatives to the private vehicle. A travel plan could encourage car sharing, cycle use, possible bussing in on employees.</li> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. As per 2 and 3.</li> </ol>

Respondent (with lpr ref)	Response	Council Response
		Sites are proposed in the Eastern part of the District.
Linda Culley (lpr1064)	<p>Does not agree with the proposed policy. Membury (LAM6)</p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows</li> </ul>	<p>Comments noted</p> <p>The Employment Land Review (ELR) is an evidence based document, which aids in guiding business development across the District, identifying need and examining sites that were put forward through the Council's call for sites. There are other factors which also need to be taken into account by the Council, such as the AONB designation.</p> <p>The Employment Land Review (ELR, 2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</p> <p>Table 4.21 (at paragraph 4.109, ELR 2020) highlights that no units are available (total stock of 46 units), reflecting the small size of the industrial market in this location.</p> <p>Paragraph 6.65 (ELR 2020) recognises there is continued demand for industrial space, as illustrated by the Walker Logistics planning application. To support the rural economy part of this site (6.9ha) could be considered for allocation.</p> <p>The ELR notes that the site seeks to address rural demand/local demand, and is better placed than other promoted sites in the AONB.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</p> <ul style="list-style-type: none"> <li>• Currently a proportion of Membury’s workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers’ spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ “LAM6 has <u>8 bus stops</u> within 400 metres”. There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV’s.</li> <li>○ They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> </li> <li>• WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>• The Council’s own Environment expert, Liz Allen, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> </ul> </li> </ul>	<p>It is considered logical and appropriate to extend existing Protected Employment Areas to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The Employment Land Review notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<ul style="list-style-type: none"> <li>○ The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as ‘local access routes’ in the Freight Strategy.</p> <p>It is known that the site is not previously developed land.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic</p>

Respondent (with lpr ref)	Response	Council Response
		<p>landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02729/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p>
Olivia Williams (lpr1066)	<p>Does not agree with the proposed policy. 1. INFORMATION PROVIDED BY STANTEC is untrue. Within Appendix A</p> <p>a. Planning permission has not been granted to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</p> <p>b. Stantec ignore recent industrial sites at Hadley Pig Farm and Lowesdon (min. 10 new units)</p> <p>c. "LAM6 DOES NOT have 8 bus stops within 400 metres". There is one bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</p> <p>d. They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. This is Un true. HGV's already use short cuts to Membury on tiny lanes unsuitable for anything more than a domestic car via Chilton Foliat.</p> <p>e. LAM6 is defined as previously developed land. This is untrue. It is a field.</p> <p>2. Over a third of all proposed industrial expansion is at LAM6 in the</p>	<p>Comments noted.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Western area. Yet all major housing developments are in Newbury and Eastern area. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability, pollution and disruption.</p> <p>3. The proposed site is located in a protected Area of Outstanding Natural Beauty, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts. The designation of AONB is intended to protect wildlife and beauty from just such development and the surrounding Area (ONB) from industrial vehicles increasing traffic and pollution.</p> <p>4. WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</p> <p>5. The Council's own Environment expert, Liz Allen, in her July 2020 paper states:</p> <p>a. "Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area"</p> <p>b. Development "proposals do not comply with Policy ADPP5 and CS19" WBC's Core Strategy.</p> <p>c. The proposed development would "merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB"</p> <p>6. The Council needs to be vigilant in avoiding hypocrisy and corruption when the electorate has made it clear that growth needs to be generated in brownfield sites using carbon neutral technology. To support out-dated industrial projects in greenfield sites is in direct opposition to the local, government and global policies required to become a carbon neutral county. This change of practice needs to be applied to every project and every proposal.</p> <p>7. The Council needs to take note of corporate techniques to sidestep or intentionally confuse local opposition, making repeated proposals under different names accompanied by false assertions from allegedly respectable consultants such as Stantec.</p>	<p>areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. Membury Industrial Estate is listed as a key industry origin and destination, and the connecting roads are outlined as 'local access routes' in the Freight Strategy.</p> <p>It is known that the site is not previously developed land.</p> <p>The Employment Land Review (ELR, 2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</p> <p>Table 4.21 (at paragraph 4.109, ELR 2020) highlights that no units are available (total stock of 46 units), reflecting the small size of the industrial market in this location.</p> <p>At paragraph 6.65 (ELR, 2020) recognises there is continued demand for industrial space, as illustrated by the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie on land that has been previously developed. Insist that any industrial vehicle accessing the site is electric or at the very least hybrid.</p>	<p>Walker Logistics planning application. To support the rural economy part of this site (6.9ha) could be considered for allocation.</p> <p>The ELR notes that the site seeks to address rural demand/local demand, and is better placed than other promoted sites in the AONB.</p> <p>It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR.</p> <p>The LCA for the site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p>



Respondent (with lpr ref)	Response	Council Response
		<p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02729/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>Building on previously developed land (PDL) is a priority. In West Berkshire, there is not enough PDL to meet demand, and therefore development is needed on greenfield sites. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Adrian McAlpine (lpr1122)	<p>Does not agree with the proposed policy. Re MEMBURY LAM 6 there is a 14km round trip from the M4 to the site- The impact on the local environment is notable. The B4000 was not built with HGVs in mind and is totally unsuitable to carry the volume of traffic this application would create. We constantly have burst water pipes as the lorry weight and speed damage the old pipework.</p> <p>the proposed development would merge two PEAs and intensify the impact of commercial development within AONB contrary to conserving and enhancing adjacent areas of the AONB</p>	<p>Comments noted.</p> <p>Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Stantec provide no convincing arguments to support the LAM 6 site and give incorrect facts and assertions.  i.e. planning permission has NOT been granted  LAM 6 has one bus stop not 8 as stated  LAM 6 is defined as previously developed land. This is UNTRUE it is a field  As a resident living off the 84000, I truly feel that due to the volume and speed of the HGVs pounding along the road that I am taking my life in my hands every time I exit my road onto the 84000. For every road intersecting the 84000 there is a potential accident waiting to happen, I have written to you several times over the last 30 years expressing this point of view but now the volume of traffic has substantially increased so have my concerns.</p> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations. Furthermore, it is more beneficial to locate development near/adjacent to existing development.</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>At paragraph 4.164 of the Employment Land Review (ELR, 2020) it is recommended that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury. The site would aid in meeting rural market demand, which has been demonstrated through the submission of a planning application for the expansion of Walker Logistics.</p> <p>Sites are proposed in the Eastern part of the District.</p> <p>The developable area of the Membury site will be focused to what has been recommended as suitable for development within the Council's landscape evidence.</p>

Respondent (with lpr ref)	Response	Council Response
Carolyn Hadden-Paton (lpr1145)	<p>Does not agree with the proposed policy.</p> <ol style="list-style-type: none"> <li>1. The proposed site (Membury) is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts.</li> <li>2. Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>3. Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle-based journeys which all leads to unsustainability.</li> <li>4. Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4.</li> <li>5. Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>6. Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>7. WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>8. Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</li> </ol>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. It is considered logical and appropriate to extend existing Protected Employment Areas renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>2. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> <li>4. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand</li> </ol>

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	<p>9. 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</p> <p>10. Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy.</p> <p>11. Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include:</p> <p>a. Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections.</p> <p>b. Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</p> <p>c. "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</p> <p>d. They conclude Ramsbury Road "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</p> <p>e. LAM6 is defined as previously developed land. This is untrue. It is a field.</p> <p>12. WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways.</p> <p>13. The Council's own Environment expert, in her July 2020 paper states:</p>	<p>(e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</p> <p>5. As point 4.</p> <p>6. As point 4.</p> <p>7. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</p> <p>8. As point 7.</p> <p>9. As point 4.</p> <p>10. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>11. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel</p>

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	<p>a. "Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area".</p> <p>b. Development "proposals do not comply with Policy ADPP5 and CS19" WBC's Core Strategy.</p> <p>c. The proposed development would "merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB".</p> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>12. See points 1, 7 and 11</p> <p>13. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and</p>

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		<p>screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>Sites are proposed in the Eastern part of the District.</p>
Alisdair Hadden-Paton (lpr1146)	<p>Does not agree with the proposed policy.</p> <ol style="list-style-type: none"> <li>1. The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts.</li> <li>2. Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>3. Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle-based journeys which all leads to unsustainability.</li> <li>4. Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4.</li> </ol>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>2. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM3 relating to climate change and sustainable building.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other</li> </ol>

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	<ol style="list-style-type: none"> <li>5. Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>6. Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>7. WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>8. Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>9. 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</li> <li>10. Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy.</li> <li>11. Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ol style="list-style-type: none"> <li>a. Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections.</li> <li>b. Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> </ol> </li> </ol>	<p>promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <ol style="list-style-type: none"> <li>4. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>5. As point 4.</li> <li>6. As point 4.</li> <li>7. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>8. As point 7.</li> <li>9. As point 4.</li> <li>10. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are</li> </ol>

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	<p>c. "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</p> <p>d. They conclude Ramsbury Road "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</p> <p>e. LAM6 is defined as previously developed land. This is untrue. It is a field.</p> <p>12. WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways.</p> <p>13. The Council's own Environment expert, in her July 2020 paper states:</p> <p>a. "Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area".</p> <p>b. Development "proposals do not comply with Policy ADPP5 and CS19" WBC's Core Strategy.</p> <p>c. The proposed development would "merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB".</p> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>11. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>12. See points 1, 7 and 11</p> <p>13. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for the site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of</p>



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		<p>development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>Sites are also proposed in the Eastern part of the District.</p>
Sarah Wallis (lpr1134)	<p>Does not agree with the proposed policy. My reasons for objecting to the proposed development of site LAM6 are: The area is one of ONB with a high number of residential homes together with farming and equine businesses spread throughout. The site is not close to junction 14 of the M4 and the route to it is along a narrow minor road before joining the already busy Ermin Street. Both roads are dangerous to walk along and equally so for riding a horse or bicycle.</p>	<p>Comments noted.</p> <p>Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is</p>

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	<p>The only access to the site LAM6 would be by vehicle and the WBC Highways Authority has deemed this unsustainable. In addition it would add heavily to the already high carbon footprint.</p> <p>There is no evidence that the workforce on the developed site will be drawn from the locality.</p> <p>The Stantec report contains several errors, namely: They state that the Walker Logistics planning application has been granted. However it is still to be heard in Planning Committee.</p> <p>The report anticipates that workers will reach the site by public transport and states there are 8 bus stops within a 400 metre radius. This is incorrect as the nearest bus stop is over a mile away for a once a day service.</p> <p>In the light of the current pandemic and the forecasted economic downturn it would be prudent to rethink all current rural planning proposals. Sadly there will be a number of small businesses which will be affected especially in towns, such as Newbury and buildings will become empty and prime for development. It is also the urban areas who will have the highest number of people out of work.</p>	<p>capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations. Furthermore, it is more beneficial to locate development near/adjacent to existing development.</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not.</p> <p>It is recognised there is a limited bus service serving the locality. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major</p>

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		<p>macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation. The provision of industrial space has been consistently strong over recent years, and both trend-based projections and economic forecasts indicate growth in industrial space. The ELR 2022 therefore recommends a minimum industrial requirement of 90,730sqm or 23 ha of land to 2039 to meet identified needs.</p> <p>To assist in meeting demand in the rural west of the District it is considered appropriate to allocate the site, and with a limited development area, following further landscape advice.</p>
Jonathan Bidmead (lpr1159)	<p>Does not agree with the proposed policy. <b>Arguments against LAM6 site at Membury under LPR 2037 plans</b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> </ol>

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	<p>other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</p> <ul style="list-style-type: none"> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site</li> <li>• Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to</li> </ul> </li> </ul>	<ol style="list-style-type: none"> <li>3. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>4. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> </ol>

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	<p>be heard by Committee a year since submission and many objections</p> <ul style="list-style-type: none"> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ “LAM6 has <u>8 bus stops</u> within 400 metres”. There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV’s.</li> <li>○ They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> <ul style="list-style-type: none"> <li>● WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>● The Council’s own Environment expert, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> <li>○ The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> </li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain</p>

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		<p>characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>Sites in the eastern part of the District are proposed.</p>
Charles Agar (lpr1170)	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There</li> </ol>

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	<ul style="list-style-type: none"> <li>• Currently a proportion of Membury’s workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers’ spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ “LAM6 has <u>8 bus stops</u> within 400 metres”. There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV’s.</li> <li>○ They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> </li> <li>• WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>• The Council’s own Environment expert, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> </ul> </li> </ul>	<p>location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</p> <ol style="list-style-type: none"> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <ol style="list-style-type: none"> <li>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty (AONB). Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the Local Plan Review.</li> </ol>



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	<ul style="list-style-type: none"> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> <li>○ The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>Sites in the eastern part of the District are proposed.</p>
Andy and Jenny Hill (lpr1174)	Does not agree with the proposed policy.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>The proposed development of this area has a significant impact on our home. With the main access to the M4 at J14 being along the B4000, directly past our house, our health and wellbeing and the value of the property itself will be further threatened. Our cottage is within 3 metres of Ermin St. Whilst the garden is protected by a tall brick and flint wall, the house itself has only a metre-high wall that shields it from the heavy traffic that already uses this B-road. HGV traffic starts early morning and continues throughout the day and well into the evening and through the weekend. As a consequence of the significant vibration that this produces, cracks are constantly appearing internally at the front of the house. Every day, we have to clear small debris from our front windowsills that is loosened from around the beams above.</li> <li>In addition, we are increasingly concerned about the air pollution that this constant traffic flow produces. Using a pollution monitoring device (the Plume Labs Flow device that measures NO2, particulate matter (PM2.5, PM10) and volatile organic compounds), we have recorded air quality index between 06:00 and 22:00 and have been somewhat shocked by weekday peak-hour readings that are frequently in the “high” to “very high” range based on WHO guidelines and throughout the day during the week routinely at the ‘moderate’ level. CO2 levels, generally, show West Berkshire as the worst performing area in the whole of the county. The proposed LAM6 development can only make things significantly worse.</li> <li>We live in a protected AONB – the proposed industrial land expansion at Membury flies in the face of the spirit of this legislation.</li> <li>The LAM6 area is in a remote part of the extreme West of Berkshire, a long way from the nearest A road, and yet most housing development is in Newbury and the Eastern area. This means even more vehicle-based journeys will have to be made by those working on the new site, putting yet more pressure on this fragile road in front of our house. This cannot be sustainable.</li> </ul>	<p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <p>Sites in the eastern part of the District are proposed.</p>

Respondent (with lpr ref)	Response	Council Response
	Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.	
Clare Neilson (lpr1183)	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> </ol>

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	<p>14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</p> <ul style="list-style-type: none"> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site</li> <li>• Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</li> <li>○ They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> </ul> </li> </ul>	<ol style="list-style-type: none"> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p>

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	<ul style="list-style-type: none"> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> <li>● WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>● The Council’s own Environment expert, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> <li>○ The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> </li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p>

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		<p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Mr St. John Neilson (lpr1184)	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed</li> </ol>

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	<p>new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</p> <ul style="list-style-type: none"> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site</li> <li>• Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</li> </ul>	<p>Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</p> <ol style="list-style-type: none"> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. (The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> </ol>

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	<p>network, contrary to conserving and enhancing adjacent areas of the AONB”</p> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p>

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		The LPR also identifies site allocations in the Eastern part of the District.
Susan Millington (lpr468)	Does not agree with the proposed policy. Add areas adjacent to J13, particular the Newbury Showground as a new designated employment area. This is identified as a key infrastructure junction (section 2) and policy should be to relocate the distribution centres in east Thatcham to this location which is more appropriate for HGV movement. This would allow the redevelopment of the Colthrop area into a mixed development (similar to the LRIE). It has the advantage of being within walking distance of Thatcham station giving excellent public transport links to Newbury and Reading/London. Removing HGVs from the local infrastructure will also help regenerate Thatcham as proposed in the plan.	The land at Newbury Showground is to be assessed through the Housing and Employment Land Availability Assessment (HELAA). If found suitable though, this would not replace existing employment areas (i.e. Colthrop), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability are unknown.  The LPR would not seek to remove/relocate employment uses at Colthrop, which is recognised as being in an important strategic location for B2, B8 and E(g) uses.  Furthermore, the A4 is part of the District's freight route and HGVs are directed to use this road.
Andy Joel (lpr1171)	<ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> </ul>	Comments noted.  1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.  2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed

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Mr and Mrs Deborah Bain (lpr1194)	<p>Does not agree with the proposed policy. Membury Lam 6</p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County’s own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the Western area. Yet all major housing developments are in Newbury and Eastern area. This leads to an imbalance between new homes and new jobs, requiring more vehicle-based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is high in the East of the county, yet LAM6 site is low in the far West.</li> <li>• Industrial demand in West Berkshire is shown to be in the East of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the West.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact, LAM6 is not “close” and has no easy access to Jct 14 of M4. The 14 km round trip for HGV’s has a huge impact on many rural communities living along these minor roads.</li> <li>• WBC’s Freight Route Plan while dated (2009) still shows LAM6 as the industrial site furthest from an A road. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV’s.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions</li> </ol>

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	<p>that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</p> <ul style="list-style-type: none"> <li>• Currently a proportion of Membury’s workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give incorrect facts and assertions within their site comparison tables, Appendix A. Many inaccuracies include: <ul style="list-style-type: none"> <li>○ Planning permission has not been granted to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>○ Stantec ignore recent industrial sites at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ “LAM6 has 8 bus stops within 400 metres”. There is one bus stop, once a day service, dangerous to walk given the access roads are narrow, unlit and dominated by HGV’s.</li> <li>○ They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> </li> <li>• WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>• The Council’s own Environment expert, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> </ul> </li> </ul>	<p>reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <ol style="list-style-type: none"> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85,</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<ul style="list-style-type: none"> <li>○ The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p>



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		<p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Ray and Sue Wells (lpr1226)	<p>Does not agree with the proposed policy.</p> <ol style="list-style-type: none"> <li>1. Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>2. The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>3. Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>4. Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> </ol>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the</li> </ol>

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	<p>5. Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</p> <p>6. WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</p> <p>7. Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include:</p> <ul style="list-style-type: none"> <li>o Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>o Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>o "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</li> <li>o They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>o LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</p> <p>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <p>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</p> <p>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled</p>

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		<p>workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p>

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		The LPR also identifies site allocations in the Eastern part of the District.
Tony and Rosemary King (lpr1239)	<p>Does not agree with the proposed policy.</p> <p><b>1) Objections to the WBCC Local Plan 2020 to 2036-Emerging Draft and support documents.</b></p> <p>I am writing to express my concerns on the approach and methodology of the current exercise to develop this plan and the errors and omissions in the detailed outcomes.</p> <p>Firstly, the Stantec Report, which underpins the employment forecasts, is flawed as it does not take account of the current COVID19 pandemic and its fundamental impact on the UK economy both in growth profile, the shift in business models for many of the major UK sectors and the change in employment patterns. Stantec themselves say that these need to be considered. Without this the plan has little value. For example, the change of model to staff working remotely will alter the office requirement significantly. This could change the balance of office and industrial requirements. If this leads to a reduction in office space, this could be replaced by allocating more sites for high quality industrial units alongside new office developments. This will reduce the overall requirement for industrial units in DEA's and hence the need to expand them.</p> <p>I also believe that the council has not been bold enough in the consideration of the best location of different types of industry. For example one clear winner in the post pandemic world will be Logistics and Distribution with exciting new opportunities but all that the plan does is allocate these to existing DEA's when it is clearly stated in the reports that these should be located close to Motorway/ Trunk road junctions. The council must research the available sites and allocate specific land for these new industries much as is planned on the M3 at Basingstoke. One of the consequences of this lack of vision is that the extension to Walkers Logistics is proposed to be at the LAM6 site, probably the least accessible site in the area. This is planning by default!</p> <p><b>2) Objections to the proposal that the LAM6 site should be extended to provide over 35% of the district's industrial site demand:</b></p> <p>A) There are numerous inaccuracies and misinterpretations in the Stantec</p>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</li> <li>A)b)c) There is little development in the pipeline in the Western half of the District (paragraph 6.17 of the ELR, 2020). Paragraph 6.65 (ELR 2020) recognises there is continued demand for industrial space, as illustrated by the Walker Logistics planning application. To support the rural economy part of this site (6.9ha) could be considered for allocation. The site has potential to provide the smaller units (circa 500 sq m) that the market assessment identifies are in particular short supply. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> </ol>

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	<p>report which lead towards a decision in favour of LAM6 to provide 35% of all of West Berkshires industrial land for expansion when in fact it is the location which is the least accessible and sustainable in West Berks(WB).</p> <p>B) Most of the demand is in the East of WB but many of the available sites identified there have been rejected in favour of LAM6, in the extreme West of the district.</p> <p>C) The employment forecast shows that demand for jobs and businesses is in sectors for which LAM6 is not a suitable site for development.</p> <p>D) Many of the current workers in LAM6 are from outside the area and from Wiltshire and Hampshire bringing no economic benefit to West Berkshire but bringing more Carbon Emissions which is the last thing we need.</p> <p>E) The current Freight Route Plan for WB shows that LAM6 is also remote from the areas of major economic activity, except for horse racing and farming, is remote from Motorways and A Class Roads with poor site access using unclassified country roads.</p> <p>F) There are a number of national policies that are stated in the Stantec Report but LAM6 fails to satisfy the needs of most of them.</p> <p>G) LAM6 is in an area of Outstanding Natural Beauty with many constraints to development and it is likely that any future planning applications will fail on this point.</p> <p>WB own experts have reinforced this.</p> <p>H) LAM6 location is unsustainable and there is no way to mitigate this. How can WB even consider this site for expansion when it breaks all their own strategic environmental and sustainability objectives and even their own officers disagree with plans to increase activity there.</p> <p>In summary, the original decision to develop the Membury Airfield site as a PEA was misguided, as it has always been inaccessible and the creeping expansion over many years has resulted in a 'planning mess', impossible sustainability issues and threats to the AONB, which in the emerging situation has placed severe constraints on its future.</p>	<p>d) Enabling a greater choice of employment opportunities in the western side of the District also means the local job market could consider employment in these uses.</p> <p>e) Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</p> <p>f) Often, there is a balancing act to be taken in choosing sites to allocate, and whether to grant planning permission. Taking into account the existing protected employment area, landscape value, access and highway capacity, and sustainability, mean that the site is considered to be in compliance with the NPPF to boost the economy.</p> <p>g) The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p>

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		<p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>h) It is recognised there is a limited bus service serving the locality, and limited options for active travel. The NPPF, at paragraph 85, outlines that</p>

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		<p>planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work). The Council considers that rural areas, especially where there are existing protected employment areas with capacity for some expansion, should be further considered for economic related development. This is part of assessing the sustainability of a scheme, not only locational factors.</p>
Lisa Cox (lpr1251)	<p>Does not agree with the proposed policy. <b>EMP6</b> Firstly I feel referring to the this land as North of Arlington Business Park is deliberately misleading to residents. It should be noted this land is adjacent to the A4, at the end of the historic high street and is very much within a residential area of the village. There is a residential home directly opposite and a housing estate adjacent. To build an office/offices would not be in keeping with the immediate surrounding area. It is likely to cause traffic issues.</p> <p>The land attracts local wildlife, such as deer and to lose it to any sort of build leaves little green space the wildlife could relocate to. Should also be noted there is a large electricity pylon in the middle of this land and therefore any build there should be questionable</p> <p><b>EMP 6 - No change, leave as it</b></p>	<p>Comments noted.</p> <p>The site can be renamed, as a stand-alone site. It was envisaged that the site would complement Arlington Business Park, which is why the site is titled the way it is.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. The LCA for this site outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale's historic character and setting. The site is part of the open countryside which continues further to the north and across</p>



Respondent (with lpr ref)	Response	Council Response
		<p>the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA) by the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>
Ami Painter (lpr1262)	<p>Does not agree with the proposed policy. I would like to submit my objections to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and the <b>open land situated near Junction 12 EMP6.</b></p> <p>I object to the draft for the following reasons (across all sites):</p> <ul style="list-style-type: none"> <li>• Flood risk</li> <li>• High voltage overhead power lines cross the site</li> <li>• Noise and pollution from the motorway</li> <li>• Possible land contamination</li> <li>• Need to preserve the gap between Theale and Calcot/Tilehurst</li> <li>• Impact on the Area of Outstanding Natural Beauty</li> <li>• Risk from fluvial, surface water and ground water flooding</li> </ul>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. The LCA for this site outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale's historic character and setting. The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA) by the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site</p>

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	<ul style="list-style-type: none"> <li>• Separated from the Arlington Business Park by the busy A4 Theale bypass</li> <li>• Impact on the Theale High Street Conservation Area</li> <li>• Impact on surrounding housing</li> <li>• Unsuitable access via single-track Blossom Lane and Crown Lane</li> </ul> <p>Any construction, large scale or otherwise, will have a detrimental impact on the existing residents of Theale, the available facilities/amenities and the local highways.</p> <p>As a current resident of Woodfield Way, Theale already struggles with the number of residents compared to the facilities available. Theale Medical Centre consistently struggles to manage all of its patients across both Theale and Calcot, and the addition of 170 new houses, with potentially double or more residents, would cause an already strained service to buckle.</p> <p>Aside from the medical centre, a new primary school has already taken up green land in Theale to accommodate larger pupil numbers, taking away a sports field where local footballs team used to play.</p> <p>The local highways would also not be able to cope with an influx on residents at this end of Theale. When there are any issues with the A4/M4, the High Street instantly becomes a rat-run for those stuck on the bypass, which causes the High Street to become a car park, and as such means it blocks the single access point for residents in and off of Woodfield Way. This area of Theale is already over populated, with too many vehicles parking along Woodfield Way meaning emergency vehicles would struggle to get through. Adding 100+ properties in this area would create an ever increasingly dangerous situation if there were to be an emergency. As there is only one point of access for this estate, adding additional homes and generating additional traffic would have a detrimental impact to all residents. This would also cause an increase in pollution which would have a harmful impact on both residents and the local environment.</p>	<p>retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The land that is proposed for development, especially sites RSA16 and <b>EMP6</b>, has a wealth of nature and the impact of building on these sites would displace those animals who inhabit the areas. There is most notably a large deer population that are often present in both sites throughout the year. The areas are also liable for flooding and with the pylons and close vicinity to the motorway would be impactful to the health of those who would potentially reside there.</p> <p>The area of Theale on the opposite side of the A4 to Arlington should be kept to the existing residential areas and not be expanded for the above reasons. In addition to this, there are already office and commercial sites in both Arlington and the Station Road areas where buildings are sat empty with no companies taking up the leases. With the increase in home working and out of town warehouse sites, it would not be appropriate to impact the local environment and put stresses on the local highways by adding unnecessary commercial properties, where there are already redeveloped sites across Theale that are not in use and have been sat empty for some time.</p> <p>The proposal is beyond reasonable for the size of Theale, does not take into consideration the overpopulation of the village that already exists, along with the strained resources that are difficult for its current residents to use.</p> <p>The green spaces of Theale should be left as such before the village becomes an overdeveloped struggling area of West Berks that merges into Reading Borough Council, with facilities and resources that are not fit for purpose and drives existing residents away for the sake of building on land for financial gain and not considering the people, environmental and highway impacts it would have.</p> <p>The area of Theale on the opposite side of the A4 to Arlington should be kept to the existing residential areas and not be expanded for the above reasons. In addition to this, there are already office and commercial sites in both Arlington and the Station Road areas where buildings are sat empty with no companies taking up the leases. With the increase in home working</p>	

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	<p>and out of town warehouse sites, it would not be appropriate to impact the local environment and put stresses on the local highways by adding unnecessary commercial properties, where there are already redeveloped sites across Theale that are not in use and have been sat empty for some time.</p> <p>The green spaces of Theale should be left as such before the village becomes an overdeveloped struggling area of West Berks that merges into Reading Borough Council, with facilities and resources that are not fit for purpose and drives existing residents away for the sake of building on land for financial gain and not considering the people, environmental and highway impacts it would have.</p>	
Steve Bridle (lpr1268)	<p>Does not agree with the proposed policy.</p> <p>As a local resident living on the corner of Membury Crossroads. I would like to robustly object to the proposed expansion of LAM6 site at Membury for expansion under the LPR2037 plans. The primary reason is the unacceptable increase in traffic for an area that doesn't have good roads or pavements. Frankly, to encourage more HGV traffic on the substandard roads of Membury by the development of further industrial development would be reckless and will end with fatal crashes.</p> <p>Many of the local businesses struggle to recruit to due to the remote location and lack of public transport.</p> <p>I would also challenge the impartiality or depth of research by the Consultants, Stantec who provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include:</p> <ul style="list-style-type: none"> <li>• Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission.</li> <li>• Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> </ul>	<p>Comments noted.</p> <p>The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</p> <p>It is considered logical and appropriate to extend existing Protected Employment Areas to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</p> <p>It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the</p>

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	<ul style="list-style-type: none"> <li>• “LAM6 has 8 bus stops within 400 metres”. There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV’s.</li> <li>• They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat</li> <li>• LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> <p>WBC Policy guidance gives presumption in favor of Sustainability, yet LAM6 has no alternative access unless by motor vehicles. This is simply unsustainable as stated by WBC Highways.</p> <p>The Council’s own Environment expert, Liz Allen, in her July 2020 paper states:</p> <ul style="list-style-type: none"> <li>• “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>• Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> <li>• The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> <p>Most housing is being built in the Newbury / Thatcham area and towards the east of the county – which makes the choice of LAM6 a strange one considering public transport to this remote part of the county is virtually non-existent so new local jobs where needed will not be provided by further development of LAM6.</p> <p>In conclusion this site is within a AONB, 7km from the motorway junction with substandard roads and a lack of public transport. Swindon has an abundance of workers and industrial facilities with excellent road access</p>	<p>rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</p> <p>Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites</p>

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	<p>which further highlights the unsustainability of LAM6 and indeed the need for it</p> <p>Lastly, please bear a thought for local residents living on the Ermin Street, Ramsbury road and Chilton Foliat whose lives will be increasingly blighted by evermore HGV's travelling to the un-sustainable LAM6 if this policy is adopted.</p> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p>

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		<p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Beth Pert (lpr1289)	<p>Does not agree with the proposed policy. I would like to submit my objections to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and the open land situated near Junction 12 EMP6. The plan includes the following:</p> <p>100 homes on Whitehart Meadow (the area of land between the Woodfield Way estate and the M4)</p> <p>70 homes on the site of the old Theale sewage works (the far end of Blossom Lane).</p> <p>20,000 square metres of new office space on the field next to M4 Junction 12.</p> <p>I object to the draft for the following reasons (across all sites):</p>	<p>Comments noted (in relation to EMP6 – Land north of Arlington Business Park). Comments for RSA16 and RSA17 considered under the Council responses to those policies).</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. The LCA for this site outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale’s historic character and setting. The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA) by</p>

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	<ul style="list-style-type: none"> <li>• Flood risk</li> <li>• High voltage overhead power lines cross the site</li> <li>• Noise and pollution from the motorway</li> <li>• Possible land contamination</li> <li>• Need to preserve the gap between Theale and Calcot/Tilehurst</li> <li>• Impact on the Area of Outstanding Natural Beauty</li> <li>• Risk from fluvial, surface water and ground water flooding</li> <li>• Separated from the Arlington Business Park by the busy A4 Theale bypass</li> <li>• Impact on the Theale High Street Conservation Area</li> <li>• Impact on surrounding housing</li> <li>• Unsuitable access via single-track Blossom Lane and Crown Lane</li> <li>• The requirement for office space was based on a council commissioned study that was carried out before the covid 19 outbreak.</li> </ul> <p>As a resident of Theale, my objections are based on my experience of living in the village on and off for nearly 20 years. The basic infrastructure of the village cannot cope with a further 170 homes. The GP surgery is already stretched to breaking point and not able to provide a high standard of patient care for local residents. An extra 170 homes would see upwards of 350 patients. This would overwhelm the surgery completely. This is even more of an issue given that the residents of the homes currently under construction on Beansheaf side of the M4 will</p>	<p>the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>



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	<p>also be registering at Theale Medical centre when the properties are completed.</p> <p>The local primary school, which was built on land used for sports and recreation, is also near to capacity. Building more homes and bringing more families in to Theale will mean the school is no longer fit for purpose and will require further extension, taking up yet more valuable green land.</p> <p>Having lived in a flat with no useable outside space during the covid pandemic, it has become even more evident how important local green space is. Building on Whithart Meadow will take away precious green space that is local to residents. The impact on our local wildlife would be irreversible too.</p> <p>The access to both sites is problematic. Woodfield Way is already very busy and with parked cars on both sides of the road, the road is already noisy and at times can be dangerous. As new homes are regularly built without sufficient parking, more cars would be using local access roads as a car park, thus increasing the noise, traffic and antisocial problems associated with on street parking. Blossom Lane has similar issues with the added problem of being very narrow. Construction traffic would cause a great deal of disruption to local residents too.</p> <p>With regards to office space, I cannot see any need for further offices to be built at this time. Having walked around Arlington business park, it's clear that the majority of offices are empty. As most businesses have adapted to working from home over the last year, the demand for further office space has decreased even further. Furthermore, the majority of office space, industrial units and depots are on the east side of the village, keeping the residential areas free of yet more traffic, noise and pollution.</p> <p>Building on sites which have a risk of flooding seems incredibly short sighted, especially at a time where a change in our climate indicates an increased amount of annual rainfall. By building on these sites, there may be an increased risk to existing homes as well as any new homes.</p> <p>While I understand the need to more homes to ease the housing crisis, I feel better options are available. Commissioning further studies in to the regeneration of empty, dilapidated and part derelict office blocks and</p>	

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	warehouses in to energy efficient homes would be more beneficial to the local community and saving our precious green space.	
Fiona Newport (lpr1334)	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <p>The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts.</p> <p>Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West, where this site is located, with minor poor road access to the M4.</p> <p>Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</p> <p>Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</p> <p>Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</p> <p>Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</p> <p>WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</p> <p>1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</p>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> </ol>

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	<p>Currently a proportion of Membury’s workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers’ spend will not benefit the local economy will not benefit.</p> <p>Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include:</p> <ul style="list-style-type: none"> <li>• Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>• Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>• “LAM6 has <u>8 bus stops</u> within 400 metres”. There is <u>one</u> bus stop, once a day service, dangerous to walk to, as the access roads are narrow, unlit and dominated by HGV’s.</li> <li>• They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>• LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> <p>WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways.</p> <p>The Council’s own Environment expert, Liz Allen, in her July 2020 paper states:</p> <ul style="list-style-type: none"> <li>• “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquillity levels within the wider area”</li> <li>• Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> </ul> <p>The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</p>	<ol style="list-style-type: none"> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p>

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	Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire, where the demand for facilities lie.	<p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p>

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		<p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Graham Storey (lpr584)	<p>Does not agree with the proposed policy. There is an opportunity to develop to the east of Thatcham Railways station for a mixed residential and employment whilst relocation the distribution hubs closer to the motorway junction.</p> <p>Add areas adjacent to J13 , particular the Newbury Showground as a new designated employment area. This is identified as a key infrastructure junction (section 2) and policy should be to relocate the distribution centres in east Thatcham to this location which is more appropriate for HGV movement. This would allow the redevelopment of the Colthrop area into a mixed development (similar to the LRIE). It has the advantage of being within walking distance of Thatcham station giving excellent public transport links to Newbury and Reading/London. Removing HGVs from the local infrastructure will also help regenerate Thatcham as proposed in the plan.</p>	<p>Comments noted.</p> <p>The land at Newbury Showground is to be assessed through the Housing and Employment Land Availability Assessment (HELAA). If found suitable this would not replace existing employment areas (i.e. Colthrop), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability is unknown.</p> <p>The LPR would not seek to remove/relocate employment uses at Colthrop, which is recognised as being in an important strategic location for B2, B8 and E(g) uses.</p>

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		Furthermore, the A4 is part of the District's freight route and HGVs are directed to use this road.
Diane James (lpr623)	<p>Does not agree with the proposed policy. EMP6 North of Arlington Business Park In past Theale Village plans, the area between the M4 and the village was to be kept clear and open to make a separation line between the village of Theale and the outskirts of Reading. The A4 approach road to Theale from the M4 gives a view of the village and the far countryside. The proposed area of construction will mar the whole aspect. When Arlington Park was built, Theale residents were told commercial building would be kept south of the A4 Bypass to preserve village life. This planning application will completely destroy the view and feel of our much loved village.</p> <p>EMP6 Land north of Arlington Business Park. Keep the area clear as open land.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. The LCA for this site outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale's historic character and setting. The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA) by the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for</p>

Respondent (with lpr ref)	Response	Council Response
		employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.
Ian Halliday (lpr628)	<p>Does not agree with the proposed policy.</p> <p><b>SP21 Sites for Economic development.</b> There are better alternatives and additional opportunities for economic development sites that are in keeping with the Council policies, whereas some of the proposed sites are in conflict with Council Policies as outlined in other comments.</p> <p>Add areas adjacent to J13, in particular, the Newbury Showground as a new designated employment area. This is identified as a key infrastructure junction (section 2) and policy should be to relocate the distribution centres in east Thatcham to this location which is more appropriate for HGV movement.</p> <p>Include the redevelopment of the Colthrop area into a mixed development (similar to the LRIE). It has the advantage of being within walking distance of Thatcham station giving excellent public transport links to Newbury and Reading/London. Removing HGVs from the local infrastructure will also help regenerate Thatcham as proposed in the plan.</p>	<p>Comments noted.</p> <p>Most of the sites outlined in Proposed Submission LPR Policy SP21 are extensions to existing Protected (Designated) Employment Areas, which have all been promoted for office/commercial/industrial development.</p> <p>The Showground site was not originally promoted for development, and having now been promoted will be assessed through the Housing and Employment Land Availability Assessment (HELAA). If found suitable this would not replace existing employment areas (i.e. Colthrop), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability is unknown.</p> <p>The Local Plan would not seek to remove/relocate employment uses at Colthrop, which is recognised as being in an important strategic location for B2, B8 and E(g) uses.</p> <p>Furthermore, the A4 is part of the District's freight route and HGVs are directed to use this road.</p>
Jane Halliday (lpr629)	<p>Does not agree with the proposed policy.</p> <p><b>SP21 Sites for Economic development.</b> There are better alternatives and additional opportunities for economic development sites that are in keeping with the Council policies, whereas some of the proposed sites are in conflict with Council Policies as outlined in other comments.</p> <p>Add areas adjacent to J13, in particular, the Newbury Showground as a new designated employment area. This is identified as a key infrastructure</p>	<p>Comments noted.</p> <p>Most of the sites outlined in Proposed Submission LPR Policy SP21 are extensions to existing Protected (Designated) Employment Areas, which have all been promoted for office/commercial/industrial development.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>junction (section 2) and policy should be to relocate the distribution centres in east Thatcham to this location which is more appropriate for HGV movement.</p> <p>Include the redevelopment of the Colthrop area into a mixed development (similar to the LRIE). It has the advantage of being within walking distance of Thatcham station giving excellent public transport links to Newbury and Reading/London. Removing HGVs from the local infrastructure will also help regenerate Thatcham as proposed in the plan.</p>	<p>The Showground site was not originally promoted for development, and having now been promoted will be assessed through the Housing and Employment Land Availability Assessment (HELAA). If found suitable this would not replace existing employment areas (i.e. Colthrop), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability is unknown.</p> <p>The Local Plan would not seek to remove/relocate employment uses at Colthrop, which is recognised as being in an important strategic location for B2, B8 and E(g) uses.</p> <p>Furthermore, the A4 is part of the District's freight route and HGVs are directed to use this road.</p>
Miss Lorraine Cannon (lpr1377)	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas 9renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas.</li> </ol>



Respondent (with lpr ref)	Response	Council Response
	<p>other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</p> <ul style="list-style-type: none"> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>. Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. This 9 mile round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</li> <li>• Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>o Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>o Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>o "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</li> </ul> </li> </ul>	<p>This is particularly relevant in the AONB to prevent the urbanisation of land.</p> <ol style="list-style-type: none"> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are</li> </ol>

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	<p>o They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</p> <p>o LAM6 is defined as previously developed land. This is untrue. It is a field.</p> <p>· WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways.</p> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>required in jobs such as logistics (engineers, managers, HGV drivers).</p> <p>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the Local Plan Review.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>

Respondent (with lpr ref)	Response	Council Response
Tracey Ockwell (lpr1457)	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County’s own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not “close” and has no easy access to Jct 14 of M4. The 14 km round trip for HGV’s impacts many rural communities living along these minor roads.</li> <li>• WBC’s Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV’s.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5</li> </ol>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Currently a proportion of Membury’s workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers’ spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ “LAM6 has <u>8 bus stops</u> within 400 metres”. There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV’s.</li> <li>○ They conclude Ramsbury Rd “has reasonable access” with little HGV constraint. Not true and upsettingly, HGV’s already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> </ul> </li> <li>• WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>• The Council’s own Environment expert, Liz Allen, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> </ul> </li> </ul> <p>The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the</p>	<p>and Policy DM4 relating to climate change and sustainable building.</p> <ol style="list-style-type: none"> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to</p>

Respondent (with lpr ref)	Response	Council Response
	rural road network, contrary to conserving and enhancing adjacent areas of the AONB”	<p>be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
<p>Gary Clarke (lpr704)</p>	<p>Does not agree with the proposed policy. Expanding as suggested in EMP1 will add to the current traffic issues around Thatcham and on the A4 from the Theale junction. The additional distribution jobs created are not great and often seasonal and the wages generally not high enough to pay for a house in the area resulting in many more commuter miles.</p> <p>Re plan to make better use of existing space on Colthrop industrial estate and limit any new development if required to manufacturing rather than warehouse/distribution sites.</p>	<p>Comments noted.</p> <p>The A4 is part of the District's freight route and HGVs are directed to use this road.</p> <p>The LPR will continue to permit development in existing protected/designated employment areas, subject to the satisfaction of criteria.</p> <p>The ELR (2020) notes that Thatcham's main industrial area is Colthrop Estate, comprising a mix of larger distribution units and smaller workshops, and is described in the ELR as 'the District's premier logistics and distribution park'. There is some vacancy in the office stock, and a very high occupancy in the industrial and warehousing stock. The allocated site to the east of the Colthrop Estate is a logical extension and would aid in meeting the identified need in the Urban Area of Thatcham.</p>

Respondent (with lpr ref)	Response	Council Response
		There is no evidence to suggest that employment in distribution is seasonal and low paid.
Susan Cocker (lpr735)	<p>Does not agree with the proposed policy. Reasons for objection I am objecting to the expansion of the Membury DEA to include EMP5 (LAM6 in HELAA) for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Development of this site would have a hugely detrimental impact on the North Wessex Downs Area of Outstanding Natural Beauty. The Employment Land Review recognises that being in the AONB is a “critical constraint” on this site. The visual impact, especially if B8 use is encouraged, will change the character of the area, described in the Landscape Character Appraisal as a “mosaic” of fields and woodland. The existing DEA areas are screened by mature trees, adding to the “patchwork” effect. Light and noise pollution would increase, as would traffic volumes.</li> <li>2. The need for an extension of the DEA on this site for B2 and B8 uses is not proven. It is convenient for West Berkshire Council, as the land has been promoted and there is a planning application for B8 use before the planning authority, but the arguments in the ELR for incorporating it are less than convincing – it “could be suitable for industrial use”, but the demand for this type of use in the west of the area is “weak”. The “evidence of local demand” appears to consist of the promoter of the site wishing expand his logistics business.</li> <li>3. The site is not sustainable. It is only accessible safely by motorised vehicles. There is no pavement, the access road is an unlit country lane, which at various points is too narrow for HGVs to pass, and the nearest bus stop is over a kilometre from the site. (NB There are not 8 bus stops within a 400m radius, as stated in the ELR) The bus service runs once a day, to Newbury.</li> <li>4. Impact on the climate. By encouraging B8 use on the DEA, this proposal will automatically increase the number of HGVs. The distance to the motorway junction is 7km, along inadequate and increasingly busy access roads. Mention that the site is 750m from the Membury Service Station is irrelevant – vehicles are not supposed to access the motorway system via this service road. To develop this site will increase its carbon footprint to</li> </ol>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected Employment Area (renamed Designated Employment Areas (DEA) through the LPR) is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</li> </ol> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to</p>



Respondent (with lpr ref)	Response	Council Response
	<p>unacceptable levels, at a time when WBC is aiming to achieve carbon neutrality.</p> <p>Rather than expand the Membury DEA further, look at alternatives. There are other sites elsewhere in the WBC area, closer to the M4/A34 junction, which would have a smaller carbon footprint.</p> <p>More directly, the ELR suggests that there is “land used for testing by TRL and also areas of open storage. This area would make a logical extension of the main Membury site”. A more efficient use of the land already in use for industrial purposes would provide more employment opportunities without building large distribution facilities, the employment value of which is uncertain – they could employ many people, but could also employ a mere handful.</p> <p>What local need there exists is for smaller, rather than large units. Lowesden Works (already in the DEA) is being redeveloped and permission has been granted for similar units at Hadley Farm.</p>	<p>integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>2. At paragraph 4.164 of the Employment Land Review (ELR, 2020) it is recommended that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury. The site would aid in meeting rural market demand, which has been demonstrated through the submission of a planning application for the expansion of Walker Logistics.</p> <p>3. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>3. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>This is particularly relevant in the AONB to prevent the urbanisation of land.</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>The LPR seeks to facilitate the growth and demand across the District, through site allocations where possible. Sites which already benefit from planning permission have been counted in the existing supply calculation.</p>
<p>Matthew Mackmin (lpr818)</p>	<p>Does not agree with the proposed policy. In relation to the proposed development of 20,000 square metres of new office space on the field next to M4 junction 12 (EMP6):</p> <p><b>1: Reduction of gap between Theale and Calcot</b> This development will reduce the open space between Theale and Calcot leaving only the M4 motorway as a barrier.</p> <p><b>2: Risk from fluvial, surface water and ground water flooding</b> 90% of this site is in Flood Zone 2. Previous applications for development of this land for housing have been rejected due to Environment Agency objection.</p> <p><b>3: Separation of the site from Arlington Business Park by the A4</b> This site is separated from neighbouring office and industrial/logistical development at Arlington Business park by the extremely busy A4.</p> <p><b>4: Overhead high voltage power lines and presence of an electricity pylon</b> The land is crossed by high voltage power lines and features an electricity pylon. National Grid has previously expressed concern/objection to development under these lines.</p> <p><b>5: Impact on Theale High Street Conservation area</b> The site is adjacent to the Theale High Street Conservation area – this area is not suitable for development of this kind and any such development would have a negative impact on the conservation area.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>6: Impact on surrounding housing</b> The area is adjacent to existing housing. These dwellings will be negatively affected by this development and the attendant increase in vehicular traffic including light and heavy goods vehicles using any logistics development.</p> <p><b>7: Access to the site</b> This site could not be accessed directly from the A4 approach to Junction 12, therefore access would have to be via High Street or Hoad Way – these are not suitable for an increase in traffic flow that would accompany such development nor suited to light or heavy goods vehicles accessing any logistics development at this site.</p> <p><b>8: Surplus of available office and industrial / logistics capacity on existing Arlington Business Park</b> There is an abundance of high-quality office and light industrial / logistical capacity currently available on the existing Arlington Business Park (and has been for some time, predating the events of March 2020). There is no immediate requirement for additional capacity of this type in this area.</p>	
Kevin Aylett (lpr788)	<p>Does not agree with the proposed policy. Objection to EMP6 “North of Arlington”, Theale Need to have a green gap between Theale and Calcot Flood risk as shown on 2<sup>nd</sup> Feb flood alert map</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>
Mr and Mrs Malcolm Fletcher (lpr958)	<p>Does not agree with the proposed policy. <u>EMP6</u></p>	<p>Comments noted.</p>

Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>1. Flood risk.</li> <li>2. Impact on surrounding housing.</li> <li>3. Increased pollution and carbon footprint for the area.</li> <li>4. Following the pandemic the design, use and need for offices will change. This planned construction is not designed for the future changes that will be required.</li> <li>5. Given the amount of existing office space in Theale that is not being utilised currently there is not a requirement for more offices.</li> </ol>	<p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>
Lorna Kristensen (lpr1961)	<p>Does not agree with the proposed policy.</p> <ol style="list-style-type: none"> <li>1. Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>2. The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>3. Over a third of all proposed industrial expansion is at LAM6 in the Western area. Yet all major housing developments are in the Eastern area. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>4. Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>5. Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>6. Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct</li> </ol>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are</li> </ol>

Respondent (with lpr ref)	Response	Council Response
	<p>14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</p> <ol style="list-style-type: none"> <li>7. WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>8. WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways.</li> <li>9. Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>• Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>• Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (minimum 10 new units)</li> <li>• "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</li> <li>• They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> <li>• LAM6 is defined as previously developed land. This is untrue and has always been a field.</li> </ul> </li> </ol> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>located in Newbury and to the east of the District. The Employment Land Review notes that the site could support the rural economy, and is better. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <ol style="list-style-type: none"> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Bridget Jones (lpr 2001)	<p><i>Full representation is attached and summarised below.</i></p> <p>Object to proposed industrial land extension at Membury which West Berkshire state is inevitable.</p> <p>We have major concerns with Stantec 2020 document, some of the conclusions and evidence base are based on old documents that have agreed review dates. Were these ever reviewed? eg the Freight Routes drawn up in 2009, reviewed in 2014, but no evidence of review.</p>	<p>Comments noted</p> <p>Many of these comments relate to the planning application, which generally has a much more detailed assessment than that of a planning policy allocation, including the Transport Assessment. The planning application would consider such information.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>There has been much development of the industry at Membury resulting in huge increase in traffic - many of businesses are large haulage companies, aggregate lorries, recycling HGV's and 24-hour Rescue and Recovery Services.</p> <p>Stantec state LAM6 extension is foregone conclusion. It is not and the planning application made late 2019 has yet to go to committee. The statement that the application has been given go-ahead raises concerns about the integrity of the planning process.</p> <p>Stantec state that the AONB is the only real barrier against expanding the DEA. There are other issues.</p> <p><b>Carbon Footprint and the Environment:</b> Inevitable increase in pollution makes mockery of Council's core strategy of carbon reduction.</p> <p>Extending the Membury DEA for large warehousing and distribution enterprises contradicts WBC's own policy statements: Environment (DC4); Air Quality (DC7); Air Quality (DC7); Conservation (DC8), Health and W/B etc. Stantec clearly state demand is in the East, so why develop in the West.</p> <p><b>AONB:</b> <b>The AONB Management Plan 2019 - 2024</b> is the statutory Management Plan for the AONB. the Core Strategy for the North Wessex Downs states that small local business enterprises (not large distribution and warehousing centres) should be encouraged and the local community are keen to encourage small local businesses. Concern that more large industrial enterprises would destroy the rural character.</p> <p>Further development would increase existing light pollution.</p> <p>Representation references the Walker's Logistics application and comments made in relation to this application.</p> <p>The effect of extension of the DEA on Landscape Character will not be negligible. Buildings, car parks, access roads will mean a loss of grassland which contributes to the mosaic of woodland mixed with arable pasture and farmland.</p> <p><b>Localized flooding:</b> Inadequate drainage and run-offs have not been insisted upon on the Membury sites and have created problems locally.</p>	<p><u>Employment Land Review and need</u> The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</p> <p>Table 4.21 (at paragraph 4.109, ELR 2020) highlights that no units are available (total stock of 46 units), reflecting the small size of the industrial market in this location.</p> <p>At paragraph 4.113 the ELR highlights that there are no obvious development opportunities, with redevelopment at existing sites being the main sources of development.</p> <p>At paragraph 4.164 recommends that to support the creation of local job opportunities in the more western rural areas, PEA boundaries could possibly be extended at Membury. The expansion of the Protected Employment Area allows for greater choice in for employment, benefiting local residents, as well as those who live further afield.</p> <p>Table 6.7 identifies the site as a potential industrial site, with further consideration needed, in recognition of its position within the AONB. Further work has been undertaken, as explained below.</p> <p>The HELAA concluded that the site was potentially developable.</p>



Respondent (with lpr ref)	Response	Council Response
	<p><b>Accessibility and Sustainability:</b>            Poor access, no bus routes direct to site, one bus stop approximately 1 mile away, no local train service, no pathways or cycle routes - all traffic must use unclassified or C road networks - inherent traffic risks. Stantec claim there are 8 bus stops nearby - where did this information come from?            Most people accessing businesses do so in their own cars, although Walkers Logistics bus people in from out of the area.</p> <p><b>Road infrastructure:</b>            Little confidence that WBC will be able to manage freight movements within the area and mitigate risk.            There are no alternative routes so there is no mitigation for the poor quality of road networks, access, environmental issues, weight restrictions, or for noise, vibration, safety and air pollution.            Any vehicle going to Membury has longest journey within West Berkshire from the major road networks to site, passing through quiet hamlets, changing rural character of area. Local road networks are already suffering and increased risk to residents, walkers, cyclists and horse riders - there is poor signage, no safe crossing points, no pedestrian signage.            Ramsbury Road is impractical for HGVs and dangerous for residents. Highways have undertaken local traffic surveys in the past, but never where required. Why has there been no freight/transport assessment undertaken and no use of the National TRICS DAta to determine true traffic impact of this site extension.            Residents had their own Transport Assessment undertaken - has West Berkshire considered this document?            Why when Membury scores lowest for demand for space and lowest for access is it being recommended? What is the rationale?            We need the green spaces between the industrial developments to ensure that the AONB is not compromised.</p> <p><b>HELAA Ref: LAM6</b>            Land was considered not suitable by the HELAA due to Highways concerns. Representations cover HELAA comments and ask what has changed?</p> <p><b>The North Wessex Downs AONB Management Plan</b>            References to Management Plan and West Berkshire Landscape Character Assessment 2019. The valued features for the Shefford Wooded Downland</p>	<p><u>Carbon footprint</u>            It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p><u>Landscape</u>            Since the publication of the LPR further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected Employment Area is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</p> <p>The LCA for the site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The</p>

Respondent (with lpr ref)	Response	Council Response
	<p>LCA include the strong rural character due to the sparse settlement and limited modern influences. Detractors include the ongoing pressure for further development which it is felt may lead to development which is out of character and can introduce suburbanizing features which may detract from the rural qualities of the area. Landscape strategy for this LCA is to conserve and enhance the valued features.</p> <p><b>Health Impact Assessments</b> See little evidence of health impact assessments being undertaken.</p> <p><b>Stantec's Report: Re Industry</b> Stantec state there is demand for larger B8 distribution near the M4 junctions, particularly close to Reading. Poor access from motorway to Membury.</p> <p>Section 12 of Executive Summary states there are possibly 4 or 5 sites that had been identified through the HELAA. Membury was not one of them in Feb 2020 and was deemed unsuitable, due to Highways concerns and impact on the AONB. Rep asks who is driving agenda and why the focus on Membury?</p> <p>Site only meets one of the six criteria in Policy SPS22.</p> <p>National policy and Guidance is to ensure sufficient land of the right type is available in the right place. Membury is not the right place.</p> <p>Core Strategy 2.39 talks of appropriate location for sites and one of criteria is capacity and impact on road networks and access by sustainable modes of transport. Membury is not on bus routes, there are no cycle paths, no pavements, the road is narrow, there are dog walkers, horse riders and members of the local community that use roads and risks increase daily. Has the issue of weight restrictions been addressed?</p> <p>Staff are bussed in, many of businesses are not local and there are little benefits to the local economy.</p> <p>Within the North Wessex AONB Strategy, small local enterprise is to be encouraged. Some businesses have outgrown the area and should be seeking to relocate, giving up space for more small local businesses.</p> <p>There are more than the 46 units at Membury stated in the Stantec Report as plots/ units are sub-let, which generates more traffic locally.</p>	<p>proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02729/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p><u>Flooding</u> A flood risk assessment would be required for the site at LAM6. Sustainable urban drainage systems would be designed as part of the development as required by planning policies. However, this would not apply to existing sites.</p> <p><u>Highways and accessibility:</u> Membury Industrial Estate is accessible to the M4 and to the A338. As part of the assessment of the site, through the HELAA, the Highways Authority considered that there is capacity on the road network to accommodate the development. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Development Opportunities: 4 113. States that planning granted around existing Walkers Logistics site but Walkers application still to go to Committee and strongly opposed.</p> <p>Conclusion: The Industrial Market 4.118. Some demand for larger B8 distribution but only for those locations near M4 junctions.</p> <p>Lowesdon Works were not fully occupied at time of Stantec report and since then applications have been submitted to redevelop buildings there. Smaller units could be accommodated at Lowesdown. Stantec report state that fully occupied but I believe 10 units were unoccupied. The impact of COVID-19 is yet unknown</p> <p>They talk of local jobs, however many people employed in the area are from Swindon or Reading or further afield. When was planning granted for Wiltshire Recycling Roll-on Roll-off lorries using Membury site granted? Table 6.7. What is justification for including site in table, as deemed unsuitable in HELAA of Feb 2020?</p> <p>Page 115 7.10. Refers to land being required to address local rural demand yet provides no evidence.</p> <p>Detrimental impact of extending the DEA would be</p> <ul style="list-style-type: none"> <li>• marked impact on quality of life for residents</li> <li>• depreciation of neighboring residential amenities</li> <li>• potential harmful impact on ancient woodland</li> <li>• potential harmful impact on Heritage site (Grad II listed building)</li> <li>• significant transport increase on the rural lane/road networks</li> <li>• Additional loss of wildlife and loss of green vistas. Additional loss of tranquility.</li> <li>• increase in light and noise pollution and negative impacts on carbon footprint.</li> </ul> <p>Withdraw LAM6 from further discussions, spread out the industrial sites within West Berkshire. This could be done if Tadley and Aldermaston are considered as alternatives.</p> <p>Not recognized by Stantec is the Hadley Farm Industrial Site given permission for several small business units in Nov 2019</p>	<p>development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations. Furthermore, it is more beneficial to locate development near/adjacent to existing development.</p> <p>The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p><u>Health Impact Assessments</u> Health Impact Assessments (HIAs) will be required under Proposed Submission LPR Policy DM3 of the LPR, as part of a submission of a planning application. HIAs will be conducted as part of the submission version of the Local Plan. Public Health were consulted as part of the Regulation 18 consultation, and were invited to comment on sites as part of the assessment for the HELAA. No comments were received in respect of the site.</p> <p>It is proposed to allocate sites for industrial uses in the east of the District as well, some of which are within the AONB.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>(19/02188/COMIND). This has yet to be developed - with this and rebuilding at Lowesdon Works the need for additional small local enterprise spaces would be met.</p> <p>There is no justification for extending the DEA at Membury.</p>	
Maria Bird (lpr2006)	<p>(From wider comment to SP17) I've noted a plan to extend the industrial space from Colthrop toward the east. Colthrop still has units that have been up to let since I moved here in 2001. This must NOT happen, spilling over into the beautiful countryside. Keep Berkshire spaces sacred.</p>	Comments noted.
Mrs J Painter (lpr2016)	<p>I am objecting to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and land situated near Junction 12 EMP6. I am a resident of Theale of over 20 years and have seen the impact that several developments over this time has had on the infrastructure of the village. Theale Medical Centre struggles to provide adequate facilities for the 10,000+ patients it has over the Theale and Calcot areas. With the proposed 170 properties to be built in the Surgery's geography, the impact on the current patient levels and care provided will be detrimental. This would be in addition to the already growing numbers of patients given the development site that is currently being built opposite the Sainsbury's retail site near Junction 12 in Calcot, who will also be served by Theale Medical Centre.</p> <p>Theale Primary School also had to be redeveloped onto a new site on North Street playing fields, which meant local footballs teams and the community lost open space to play on and use for recreational purposes. The impact of 170 new homes would mean more residents would not have enough space for recreational use, as well as new families moving into the village putting pressure onto the primary school, which is becoming quickly overwhelmed with the number of pupils it already has.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. The LCA for this site outlines that the site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot. The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale's historic character and setting. The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB. The site is separated from the Protected Employment Area (PEA) by the A4 Bath Road and due to the lack of intervisibility with the site and the PEA the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale.</p> <p>It notes that the introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale, and development</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The local highways in Theale would also not be able to cope with the increase in traffic across all sites. As a resident of Woodfield Way, there have been numerous times where the access to this part of Theale has been blocked due to traffic issues along the A4 and M4. The High Street is often used as a cut through when the bypass is at a standstill and this means local residents are either trapped in the village unable to leave, or unable to access their homes due to the volume of traffic. As there is only 1 access point for the Woodfield Way area of Theale, increasing pressure on this site with the addition of 100 home and 20,000 sqft of commercial property will cause not only disruption to those who live in these areas, but will also increase the impact on the environment with more vehicles and the pollution it will cause.</p> <p>The increase in numbers of vehicles will also cause issues given the current problems experienced with restrictions in access around the Woodfield Way/High Street area. Commercial units at the top of Woodfield Way park their vehicles outside of their units, and residents who have multiple vehicles use the roads to park their cars/vans which narrows the road access. There is constantly a risk that emergency services would not be able to get to the properties furthest down Woodfield Way due to the current number of vehicles that use the roads as a car park. Adding 100 homes, with the same number if not more cars/vans etc. would be more than the local highways would be able to cope with.</p> <p>The proposed introduction of commercial units on site EMP6 is also ill considered. Aside from the above mentioned impact this would have on the local highways, there is also a number of commercial units already in Theale that are currently empty. Arlington Business Park has numerous offices currently empty, with no signs of companies taking up leases due to the current pandemic and the move to work from home. The need for physical commercial space is less now than last year, and to add an additional 20,000 sqft unit would be unnecessarily building on a conservation area for the sake of it. In the Station Road commercial area of Theale there are currently units of 18,000+, 20,000 and 24,000+ sqft which are available for lease and are standing empty, with again no prospective companies taking up the opportunity to lease them.</p>	<p>across the whole site would create the perception of coalescence with Calcot and loss of separate identity of Theale from Calcot. Development would also be visible from areas with the North Wessex Downs AONB.</p> <p>The LCA concludes that if the site were developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It therefore recommends that the site is not developed for employment uses. Therefore, as part of the LPR going forward it is no longer proposed to allocate the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The Arlington Business Park side of the A4 should be kept commercial, with residential only dwellings on the Theale High Street side of the A4 due to the eases of access for larger vehicles and current commercial sites that already exist. To merge commercial and residential will mean residents lose the open green land of Theale (which is ever decreasing) impacting on residents' ability to walk around the village in a comfortable environment free of vehicle, commercial and noise pollution.</p> <p>Now more than ever the open green land of Theale should be left as such, as it allows the community the ability to take exercise without travelling which is key given the current pandemic. To lose this land would also impact on the natural habitats of the wildlife living there, which will displace many animals. Trees have already been cut in the Whitehart Meadow site, and this has caused an increase in light and noise pollution from Junction 12, IKEA and its car park along with the overnight roadwork noises from the smart motorway works. Placing 100 properties on this land would be detrimental to those who live next to and opposite the site due to the disruption the development would cause on both the residents and highways, along with it being built on a site of flood risk and uncomfortably close to the overhead power lines/pylons situated in the land.</p> <p>Lastly, with building on the proposed sites, the gap between Theale and Calcot/Tilehurst will significantly decrease. Theale is already situated in a difficult location where emergency services are pulled from opposite towns to the furthest reach of their geography to attend to us. Both Reading and Newbury Police and Ambulance crews find it difficult to attend as we are approx. 10 - 15 miles from each local station for crews to be sent. By adding more residential and commercial sites to Theale this will add increasing pressure to services such as blue lights which is already stretched given our location and the current pandemic situation.</p> <p>For the above reasons, in addition to a site already marked for development along The Green near the Tidmarsh/A4 end of Theale, I object to the local plan review 2020 - 2037 covering sites Whitehart Meadow, The Old Sewage Works and the open land besides the A4 and M4 opposite Whitehart Meadow.</p>	

Respondent (with lpr ref)	Response	Council Response
	I hope this objection will be well considered along with the areas of Theale that are already over developed and struggling to cope with the current population of the village.	
Max Agar (lpr2059)	<p>Ref LAM6 (site at Membury)</p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4.</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsuitable by both the County's own Highways and Environmental Planning experts.</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> if the region, but only 3 sites here meet 65% if land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14km round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> </ul>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</li> </ol>

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	<ul style="list-style-type: none"> <li>• 1997-2017 data shows the local economy 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</li> <li>• Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections.</li> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units).</li> <li>○ "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</li> <li>○ They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> </ul> </li> <li>• WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBCHighways.</li> <li>• The Council's own Environment expert, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ "Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area".</li> </ul> </li> </ul>	<ol style="list-style-type: none"> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning permission would be granted or not. The site is not previously developed land.</li> </ol> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p>



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	<ul style="list-style-type: none"> <li>○ Development "proposals do not comply with Policy ADPP5 and CS19" WBC's Core Strategy.</li> <li>○ The proposed development would "merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB".</li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p>

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		<p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Jayne Dowe (lpr2095)	<p>I would like to comment that I do not support the areas proposed for development (<i>in Theale</i>) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The impact of additional traffic on the village. The proposed access route for Whitemeadow and the adjacent field is a major route used by pedestrians to access the footbridge over the motorway. Additional traffic will raise risks to pedestrians, particularly school children. The high street is narrow and already ill-equipped to deal traffic. The junction is already busy due to its proximity to the motorway, business parks and the A4.</li> <li>• Blossom Lane is a narrow quiet residential road, increased traffic would cause further risks and inconvenience.</li> <li>• The impact on the estates that will be adjacent to the development – Woodfield Way, Alderfield Close etc, leading to overcrowding,</li> </ul>	<p>All comments noted.</p> <p>It is recognised that the comments are made to the housing sites in Theale, and therefore not all directly relevant to the proposed employment site.</p> <p>The ELR recognises Theale as one of the locations in the District providing office stock (out of town). Theale is more in demand from occupiers than in other areas of the District, due to its proximity to Reading (paragraph 4.42). At 4.52 the ELR (2020) recognises there are vacancies, which are particularly highest in the larger unit size (10-20,000 square foot), though does not consider this a cause for concern. Recent demand has been from corporate occupiers/SMEs, with a higher demand than in other areas</p>

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	<p>impact on view, traffic through the local area. This will impact on the living standards of existing residents.</p> <ul style="list-style-type: none"> <li>• The development will reduce the protective barrier between existing homes and the motorway.</li> <li>• The negative impact on living standards in regards to the new developments being in extremely close proximity to the overhead power lines and the motorway, leading to poor air quality, noise pollution and poor living environment for potential 'new' residents.</li> <li>• The impact on services within Theale, which are already under strain, particularly at this time health services.</li> <li>• Reduction in the boundaries between Theale and Calcot.</li> <li>• All three locations are abundant with wildlife, whose habitat would be destroyed.</li> <li>• Much of the office space within Arlington business park is currently not in use, therefore it is unclear why further office space would be required. The visual impact of the structures will affect the outlook of the village on approach.</li> <li>• The continued development in these areas will continue to spoil the aesthetic of the village as a whole. There are already approved areas of significant housing development within Theale, if these additional areas are also approved the village will lose its character and become overcrowded, overrun by traffic and will have a significant negative impact on existing residents.</li> </ul>	<p>of the District. At 4.66 the ELR (2020) comments that office occupiers prefer to be closer to the town centre or a motorway junction, though due to lack of available space and land they are prepared to take space in outer locations, such as Greenham Business Park.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>
Woodlanders Action Group (lpr2103)	<p>Petition – 105 signatures As local residents, we object to the LAM6 extension at Membury to meet over a third of West Berkshire's 2036 demands for forecast industrial land needs because...</p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and given incorrect facts and assertions: Planning permission <u>has not been granted</u>; within their site comparison</li> </ul>	<p>All comments noted.</p> <p>The ELR (2020) explains that the site is not in the main area of market demand, but has acknowledged local demand (para 6.80).</p> <p>The ELR demonstrates that there are high occupancy rates at Membury.</p>

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	<p>tables, Appendix A there are numerous inaccuracies and out of context statements</p> <ul style="list-style-type: none"> <li>The proposed site is located in a protected AONB area, and is deemed unsustainable by both WBC's own Highways and Environmental Planning experts</li> </ul> <p><b>Specifically... LPR Plans December 2020</b></p> <ol style="list-style-type: none"> <li>Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>Transport Policy SP22 outlines <u>six</u> criteria for mitigating transport impact. Only <u>one</u> is met by LAM6.</li> <li>Table 4 show Carbon Dioxide levels in West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> </ol> <p><b>Stantec Consultants August 2020</b></p> <ol style="list-style-type: none"> <li>Industrial demand in West Berkshire is shown is in the <u>East</u> of the District. Yet only 3 eastern sites are identified, with the industrial land needs shortfall of 35% coming from the <u>West</u> at LAM6.</li> <li>Market attraction is <u>high</u> in the <u>East</u> of our region, yet LAM6 site is <u>low</u> and located in the far <u>West</u>.</li> <li>Of six <u>Eastern</u> sites rejected, five were done so for AONB reasons. Yet in the <u>West</u>, with all its AONB and access issues, LAM6 is selected despite its illogical location to meet demand. Even if West Berks decides AONB should not be a barrier to developing industrial land, four sites identified at Beenham with <u>medium market attractiveness</u> offer up 32 hectares in the East. Yet with <u>low demand attractiveness</u> and a fifth smaller in size, LAM6 is proposed</li> </ol>	<p>Demand for space is weaker than in other areas, though this is due to the small size of the industrial area (ELR, 2020 para 4.98).</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Sites have been identified in the east of the District. The policy seeks to expand Designated Employment Areas, which are spread across the District. It is logical to seek to expand existing sites, rather than allocate new sites away from such areas and outside of urban areas (Designated Employment Sites are not within the settlement boundary of existing settlements).</p> <p>The site is in reasonable distance of J14 of the M4, on a Freight Route. HGV traffic is directed to this road network. The Highways Authority have commented, through the HELAA and the planning application, that the local road network has capacity for vehicular movements associated with the site.</p> <p>Creating employment opportunities, where this can be cross-boundary, is important. The planning application demonstrated that there was local interest in jobs to be created.</p> <p>Stantec were tasked with examining sites (from a property market perspective) which had been brought to the Council's attention through the call for sites. These sites were assessed through the Housing and Economic Land Availability Assessment to filter out unsuitable and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>in the West. One has to conclude, Stantec's thinking and rationale for this location recommendation is muddled and highly subjective.</p> <p>7. Membury is described as "various industrial areas located around the M4 "as if this motorway has any beneficial access to LAM6. Described as being "close to junction 14 of M4" <u>it is in fact a 14 km round trip for HGV's</u> to and from this site. Using B, D and unclassified roads, these industrial site journeys impact the many rural communities living along these minor roads.</p> <p>8. In West Berks' dated Freight Route Plan 2009, <u>LAM6 is the industrial site furthest from an A road</u>. As the most remote in this region, it is also the least suitable for HGV's. Yet, LAM6 is "talked up" as Stantec makes desperate efforts to secure its inclusion so as to reach the Industrial land area target.</p> <p>9. Economic data from 1997 to 2017 shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. The 2020 to 2030 forecast trend is extrapolated to 2036. It follows that the jobs increasingly in demand, will still not be provided by the LAM6 site. Today a proportion of Membury's workers are currently bussed in from Temp Agencies in Reading and out of District. This would only continue, and data shows Membury workers are below County average wage levels.</p> <p>10. Stantec inaccurately state on Page 69 #4.113 that although not yet developed, Walker Logistics has permission to expand its operations on the LAM6 site. But the merit of this application is still to be heard by WB Planning Committee a year after its original submission and many re-submitted documents, opposed strongly by AONB, residents and WBC's Highways and Environmental experts.</p> <p>11. Other mistakes appear in Appendix A on Stantec's site comparison tables, including:</p> <ul style="list-style-type: none"> <li>o Stantec ignored availability of 10+ new industrial units at Hadley Pig Farm and Lowesdon.</li> <li>o Inaccurately, they claim "LAM6 has <u>8</u> bus stops within 400 metres" (p. 119 #23/p. 125 #29). Well over a mile away, there is just <u>one</u> bus stop. This a once a day service is too</li> </ul>	<p>undeliverable sites. The Council needs to ensure that sites which are identified for development are available, achievable and deliverable. The Council then need to decide on sites going forward, looking at constraints.</p> <p>It is acknowledged (at the time of the receipt of the representation) that the Walker Logistics site had not been granted planning permission.</p> <p>It is recognised that there are not 8 bus stops in the vicinity of the site, and has a very limited bus service. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport.</p> <p>The Transport Assessment and Travel Plan which the site specific policy will require of the site will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work). The Travel Plan may also extend to directing the traffic movement to the main roads.</p> <p>A weight restriction exists on the B4001 heading south towards Chilton Foliat.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR. Membury Protected Employment Area is made up of a central area and a number of fragmented smaller outlying areas. The site loosely connects these areas. The eastern part of the site</p>

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	<p>risky to walk from LAM6 given access is via rural roads that are narrow, unlit and HGV dominant.</p> <ul style="list-style-type: none"> <li>○ Stantec admit Hurst Farm on Ermin Street (B4000) “has weak vehicular access in an area of weak demand”. Yet HGV’s need to pass this location before reaching the even narrower Ramsbury Rd which they bizarrely state “has reasonable access” with little HGV constraint. Upsettingly, HGV’s already use short cuts via tiny lanes from Chilton Foliat to Membury.</li> <li>○ Page 124 #6, they state LAM6 was previously developed land. This is untrue. It is a field.</li> </ul> <p>12. This site doesn’t meet NPPF guidance:</p> <ul style="list-style-type: none"> <li>○ LAM6 neither conforms to the NPPF 2019 nor WBC’s own policies in the LPR.</li> <li>○ Presumption is in favour of sustainability, yet LAM6 site has no alternative access unless it is motorised vehicles. This is simply unsustainable (WB transport lead opinion)</li> </ul> <p><b><u>Environment report by Liz Allen – July 2020 (same LAM6 site re planning application)</u></b></p> <p>13. The site is set within the North Wessex Downs AONB. As stated within ADPP5, new development will need to conserve and enhance the local distinctiveness, sense of place and setting of the AONB whilst preserving the strong sense of remoteness. <i>“Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest... (including) detrimental effect on environment, landscape etc.”</i></p> <p>14. The Applicant’s Landscape Visual Assessment (LVA) submitted “has been overly <u>biased towards the proposals within its assessment</u> and has omitted key aspects which has <u>led to a number of conclusions which I cannot agree to or support</u>”.</p> <p>15. “Increased <u>traffic</u> will have a further <u>adverse impact on the rural quality</u> of Ramsbury Road and <u>tranquillity levels within the wider area</u>”</p>	<p>has an established visual and landscape connection with the open arable landscape area further to the east of Ramsbury Road. The western part of the site (runway area) connects to the adjacent area of open grassland which leads across to the Iron Age hillfort and the wider countryside</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p>

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	<p>16. <u>The proposals do not comply with Policy ADPP5 and CS19 of the West Berkshire Core Strategy.</u> As stated within Policy CS 14: <i>New development must demonstrate high quality and sustainable design that respects and enhances the character and appearance of the area.</i></p> <p>17. The proposed development would “merge two PEAs (re-designated as DEAs) ... and <u>intensifies the impact of commercial development within AONB</u>, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</p> <p>18. (By) “allowing a gap to be included within the woodland belt (this could also open up the western area of this site to development pressure”</p>	
Ivor Regan (lpr2181)	<p>Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</p> <p>The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County’s own Highways and Environmental Planning experts</p> <p>Over a third of all proposed industrial expansion is at LAM6 in the Western area. Yet all major housing developments are in Newbury and Eastern area. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</p> <p>Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%.</p> <p>LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</p> <p>Market attraction is high in the East of the county, yet LAM6 site is low in the far West.</p> <p>Industrial demand in West Berkshire is shown to be in the East of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the West. Membury is described as “various industrial areas located around the M4”. In fact LAM6 is not “close” and has no easy access to Jct 14 of M4. The 14 km round trip for HGV’s impacts many rural communities living along these minor roads.</p>	<p>Comments noted.</p> <ol style="list-style-type: none"> <li>1. The ELR (2020) notes at paragraph 4.86 that across Membury (not only around LAM6) there are a range of different sizes and styles of industrial units, and that some of the units are reasonably large when compared to other locations in the Authority area. Demand is weaker (paragraph 4.98) than other areas in the District, but this is due to the small size of the industrial area. There are cases of existing occupiers seeking to expand (e.g. Walker Logistics). Industrial demand is mainly from local/regional occupiers.</li> <li>2. It is considered logical and appropriate to extend existing Protected Employment Areas (renamed Designated Employment Areas (DEA) through the LPR) to focus development into particular areas. This is particularly relevant in the AONB to prevent the urbanisation of land.</li> <li>3. It is not considered that there is an imbalance between the proposed expansion of employment floorspace and the proposed major housing</li> </ol>

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	<p>WBC's Freight Route Plan while dated (2009) still shows LAM6 as the industrial site furthest from an A road. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's. • 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</p> <p>Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</p> <p>Consultants, Stantec provide no convincing arguments to support the LAM6 site and give incorrect facts and assertions within their site comparison tables, Appendix A. Many inaccuracies include: o Planning permission has not been granted to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</p> <p>Stantec ignore recent industrial sites at Hadley Pig Farm and Lowesdon (min. 10 new units)</p> <p>"LAM6 has 8 bus stops within 400 metres". There is one bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's. They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat. LAM6 is defined as previously developed land. This is untrue. It is a field.</p> <p>WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</p> <p>The Council's own Environment expert, Liz Allen, in her July 2020 paper states: "Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquillity levels within the wider area" Development "proposals do not comply with Policy ADPP5 and CS19" WBC's Core Strategy.</p>	<p>developments. The majority of existing DEAs are located in Newbury and to the east of the District. The ELR notes that the site could support the rural economy, and is better placed than other promoted sites in the AONB. The proposed expansion in Membury, where the planning application illustrates that there is demand for such use, with jobs created which local residents can make use of.</p> <ol style="list-style-type: none"> <li>4. Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</li> <li>5. Membury Industrial Estate is accessible to the M4 and to the A338. The West Berkshire Freight Strategy (2009) recognises Membury Industrial Estate as a key industrial site, and has the B4000 as part of the District Freight Route. The Highways Authority consider that there is capacity in the local transport network to accommodate development. The Highways Authority are concerned that the site is not in a sustainable location. In rural areas the NPPF recognises that land for employment may not be in accessible locations.</li> <li>6. Job creation is a benefit to promoting employment opportunities in this end of the District. Skilled workers, attracting varying degrees of pay, are required in jobs such as logistics (engineers, managers, HGV drivers).</li> <li>7. It is recognised that planning permission was not granted at the time of drafting the ELR, and there was no direction given as to whether planning</li> </ol>



Respondent (with lpr ref)	Response	Council Response
	<p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>permission would be granted or not. The site is not previously developed land.</p> <p>The ELR takes account of all commitments when assessing the supply of employment uses. Should sites have not been promoted to the Council and therefore not assessed in the HELAA the ELR would not make specific reference to them.</p> <p>It is recognised there is a limited bus service serving the locality. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. The Transport Assessment and Travel Plan, which the site specific policy will require of the development, will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work).</p> <p>8. The Council is duty bound to take account of the effect of development on designated landscapes, such as the Area of Outstanding Natural Beauty. Further landscape assessment has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the Local Plan Review.</p> <p>The LCA for this site identifies a loss of open land, loss of open views within the AONB, and loss of quiet rural character and rural character of Ramsbury Road as potential impacts of</p>

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		<p>development. In terms of the impact on the existing PEA the fragmented character allows the undeveloped areas in-between to retain characteristic landscape features of the AONB, therefore mitigating and reducing the overall effect of the PEA on the AONB. The proposed site connects four of these together, which would result in one large area and the potential loss of these mitigating landscape features.</p> <p>Opportunities to propose substantial areas of tree and woodland planting as part of mitigation measures would not be out of character. Woodland would help, in time, to integrate and screen any proposed development as well as enhancing the area.</p> <p>The LCA recommends that development is limited to a focused area, to the eastern part of the submitted site. This reflects the development area outlined in the planning application (19/02079/OUTMAJ). It is considered such recommendations must be followed, and the policy will list criteria, as suggested in the LCA for the reserved matters application, or any other scheme, to be implemented.</p> <p>The LPR also identifies site allocations in the Eastern part of the District.</p>
Meg Randall (lpr1442)	I am writing to oppose the recent plans made for housing and offices in whitehart meadow, Theale sewage works and the field next to the m4 junction 12. I believe it is of great importance to keep these few areas of wildlife we still maintain in Theale and for a village so quaint and with such character these unlikely areas contribute greatly to the feel of the village. In times like these we have learned how important nature is to a community	<p>Comments noted, in relation to offices (residential considered under responses to Emerging Draft LPR Policy RSA16 and Policy RSA17).</p> <p>No public rights of way are present across the site proposed in the Regulation 18 version of the LPR. It is</p>

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	<p>such as the one in Theale. These areas are the only accessible walks within the village out of the way of houses and the only thing I believe can improve Theale would be more wildlife and walks! This has benefitted my mental health greatly as well as other people's and I strongly believe we need to maintain these natural and fascinating locations rather than expanding a village that has always thrived off of its old and quaint character.</p> <p>Thank you for taking the time to read my email and I really hope you take this into consideration</p>	<p>recognised that public footpaths are present on adjacent land, planned for housing). THE8 is a privately owned site, and was not promoted for Green Infrastructure.</p>
<b>Landowners, site promoters and developers</b>		
<p>Rooksnest Estate Office (Mr Robert Price) (lpr1240)</p>	<p>Does not agree with the proposed policy.</p> <p><b><u>Arguments against LAM6 site at Membury under LPR 2037 plans</u></b></p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth coming from the East of West Berkshire and not in the extreme West where this site is located with minor poor road access to the M4</li> <li>• The proposed site is located in a protected AONB area, and is deemed unsustainable by both the County's own Highways and Environmental Planning experts</li> <li>• Over a third of all proposed industrial expansion is at LAM6 in the <u>Western area</u>. Yet all major housing developments are in <u>Newbury and Eastern area</u>. This leads to an imbalance between new homes and new jobs, requiring more vehicle based journeys which all leads to unsustainability.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. LAM6 will generate significantly longer travel journeys than other sites, just increasing more carbon emissions unnecessarily in West Berkshire.</li> <li>• Market attraction is <u>high in the East</u> of the county, yet LAM6 site is <u>low in the far West</u>.</li> </ul>	<p>All comments noted.</p> <p>The ELR (2020) explains that the site is not in the main area of market demand, but has acknowledged local demand (para 6.80).</p> <p>The ELR demonstrates that there are high occupancy rates at Membury. Demand for space is weaker than in other areas, though this is due to the small size of the industrial area (ELR para 4.98). The allocation would serve the rural Western part of the District.</p> <p>Sustainable construction and renewable energy generation can help in achieving emissions reduction. Development will be expected to comply with Proposed Submission LPR Policy SP5 and Policy DM4 relating to climate change and sustainable building.</p> <p>Sites have been identified in the east of the District. The policy seeks to expand Designated Employment Areas, which are spread across the District. It is logical to seek to</p>

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	<ul style="list-style-type: none"> <li>• Industrial demand in West Berkshire is shown to be in the <u>East</u> of the region, but only 3 sites here meet 65% of land needs. That shortfall is illogically made up by siting it at LAM6 in the <u>West</u>.</li> <li>• Membury is described as "various industrial areas located around the M4". In fact LAM6 is not "close" and has no easy access to Jct 14 of M4. The 14 km round trip for HGV's impacts many rural communities living along these minor roads.</li> <li>• WBC's Freight Route Plan while dated (2009) still shows <u>LAM6 as the industrial site furthest from an A road</u>. As LAM6 is the most remote in West Berkshire, it is also the area least suitable for HGV's.</li> <li>• 1997-2017 data shows the local economy grew 34%, primarily in jobs unlikely to be attracted to LAM6. In the 2036 forecast it follows that these jobs, increasingly in demand, will still not be provided by the LAM6 site.</li> <li>• Currently a proportion of Membury's workers are bussed in from Temp Agencies in Reading and Swindon. This would only continue. Data shows Membury workers are below County wage levels and those out of County workers' spend will not benefit the local economy will not benefit.</li> <li>• Consultants, Stantec provide no convincing arguments to support the LAM6 site and give <u>incorrect</u> facts and assertions within their site comparison tables, Appendix A. <u>Many inaccuracies</u> include: <ul style="list-style-type: none"> <li>○ Planning permission <u>has not been granted</u> to Walker Logistics to develop the LAM6 site. Its application is still to be heard by Committee a year since submission and many objections</li> <li>○ Stantec <u>ignore recent industrial sites</u> at Hadley Pig Farm and Lowesdon (min. 10 new units)</li> <li>○ "LAM6 has <u>8 bus stops</u> within 400 metres". There is <u>one</u> bus stop, once a day service, dangerous to walk to given the access roads are narrow, unlit and dominated by HGV's.</li> <li>○ They conclude Ramsbury Rd "has reasonable access" with little HGV constraint. Not true and upsettingly, HGV's already use short cuts to Membury on tiny lanes via Chilton Foliat.</li> </ul> </li> </ul>	<p>expand existing sites, rather than allocate new sites away from such areas and outside of urban areas.</p> <p>The site is in reasonable distance of J14 of the M4, on a Freight Route. HGV traffic is directed to this road network. The Highways Authority have commented, through the HELAA and the planning application, that the local road network has capacity for vehicular movements associated with the site.</p> <p>Creating employment opportunities, where this can be cross-boundary, is important. The planning application demonstrated that there was local interest in jobs to be created.</p> <p>Stantec were tasked with examining sites (from a property market prespective) which had been brought to the Council's attention through the call for sites. These sites were assessed through the Housing and Economic Land Availability Assessment to filter out unsuitable and undeliverable sites. The Council needs to ensure that sites which are identified for development are available, achievable and deliverable.</p> <p>It is acknowledged (at the time of the receipt of the representation) that the Walker Logistics site had not been granted planning permission.</p> <p>It is recognised that there are not 8 bus stops in the vicinity of the site, and has a very limited bus service. The NPPF, at paragraph 85, outlines that planning policies should recognise that employment sites in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport.</p>

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	<ul style="list-style-type: none"> <li>○ LAM6 is defined as previously developed land. This is untrue. It is a field.</li> <li>● WBC Policy guidance gives presumption in favour of Sustainability, yet LAM6 has no alternative access unless by motorised vehicles. This is simply unsustainable as stated by WBC Highways</li> <li>● The Council’s own Environment expert, Liz Allen, in her July 2020 paper states: <ul style="list-style-type: none"> <li>○ “Increased traffic will have a further adverse impact on the rural quality of Ramsbury Road and tranquility levels within the wider area”</li> <li>○ Development “proposals do not comply with Policy ADPP5 and CS19” WBC’s Core Strategy.</li> <li>○ The proposed development would “merge two PEAs...intensifies the impact of commercial development within AONB, including increased traffic on the rural road network, contrary to conserving and enhancing adjacent areas of the AONB”</li> </ul> </li> </ul> <p>Rethink the LPR plans regarding industrial land extension and find more relevant locations in the eastern part of West Berkshire where the demand for facilities lie.</p>	<p>The Transport Assessment and Travel Plan which the site specific policy will require of the site will seek to ensure that development is appropriate to local roads and encourage sustainable travel modes (e.g. car sharing, busing in staff, cycling and provision of showers and suitable storage at place of work). The Travel Plan may also extend to directing the traffic movement to the main roads.</p> <p>A weight restriction exists on the B4001 heading south towards Chilton Foliat.</p> <p>Site allocations are proposed in the Eastern part of the District.</p>
Pro Vision (Luke Vallins) for Mr and Mrs Mathew Pittard (lpr1965)	<p><i>Representation promotes the allocation of Land at Lower Way Farm, Thatcham. Full representation is attached as a response to Policy SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham.</i></p> <p>Policy SP21 sets out the sites within the District that are allocated for “economic development”.</p> <p>The supporting text (paragraph 7.12) confirms that “National policy sets out the definition of economic development which goes beyond employment to include main town centre uses, as well as community and public uses.”</p> <p>However, it notes that “This policy deals with business development in order to ensure the health of the District’s Designated Employment Areas are maintained.”</p>	<p>Comments noted.</p> <p>It is recognised that the site currently contains small scale commercial units and retail outlets. It is not considered that the site is suitable for larger scale development, and the existing space functions well, given the constraints on site.</p> <p>DM policies would guide any new development or redevelopment of the site, including Proposed Submission LPR Policy DM35 (Sustaining a Prosperous Rural Economy).</p>

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	<p>In addition to the land at Lower Farm Way that our client is promoting for residential development, our client owns the commercial premises to the south and west of the site known as “Lower Way Farm Riverside Studios”. The premises comprise the former farm buildings of Lower Way Farm. The former farm buildings have now been converted to form a number of small-scale commercial enterprise units and is a thriving example of diversification. The commercial area includes a café together with studios and retail outlets. Strategic Objective 4 of the draft Local Plan seeks “<i>To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.</i>”</p> <p>Given the success of Riverside Studios as an established local employment premises, its allocation for economic development would fully comply with this Strategic Objective, safeguarding the modest level of employment opportunities that it provides.</p> <p>We therefore recommend that the site is allocated in the Local Plan Review for this use and the settlement policy boundary is re-drawn accordingly to include the site.</p> <p>We therefore recommend that the site known as “Lower Way Farm Riverside Studios” is allocated in the Local Plan Review for commercial use and the settlement policy boundary is re-drawn accordingly to include the site.</p>	
Caroline McDade (Deloitte) for Green Park Reading No. 1 LLP (lpr2029)	<p><i>Full representation attached in relation to Green Park, Reading</i> <u>Policy SP21 Sites allocated for economic development</u></p> <p>Policy SP21 identifies several extensions to Designated Employment Areas and one new Designated Employment Area. It also identifies five sites that are well established employment areas and sets out that their importance to the local economy will be recognised by classifying them as Designated Employment Areas.</p> <p>It is recognised that the majority of Green Park falls within the administrative boundary of Reading Borough Council and is designated as a Core Employment Area in the adopted Reading Borough Council Local Plan. It would therefore be appropriate for the area of Green Park located in West Berkshire to be classified as a Designated Employment Area to reflect its</p>	<p>Comments noted.</p> <p>Green Park itself lies outside of West Berkshire District, and it is therefore not possible for the Local Plan to apply a designation to this site through the LPR.</p>

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	<p>existing uses. GPR requests that Policy SP21 be amended to include Green Park and for the Site to be allocated as a Designated Employment Area. GPR is also seeking an allocation for the part of the Site that lies within Wokingham Borough Council's jurisdiction.</p> <p>Paragraph 24 of the National Planning Policy Framework identifies that Local Planning Authorities have a duty to co-operate with each other on strategic matters that cross administrative boundaries. GPR considers classifying the area of Green Park that falls within West Berkshire as a Designated Employment Area would provide continuity to the existing Core Employment Area in Reading.</p> <p>The Employment Land Review (ELR) which supports the LPR identifies that a minimum of 65,000 sqm of office floor space will be required over the plan period. Classifying Green Park and the Site as a Designated Employment Area will allow suitable office and business uses to come forward easily in the areas of Green Park within West Berkshire and to provide a natural future pipeline of employment land to meet longer term demand. This will allow for the sustainable growth of office and business space at an existing and well established employment location.</p>	
<p>Mr Geraint Jones (Savills) for Newbury and District Agricultural Society (lpr2046)</p>	<p><i>Full representations attached</i></p> <p>Savills' research evidence suggests that prior to the Covid-19 pandemic, the warehousing market along the 'M4 corridor' was already chronically undersupplied with just 0.56 years of supply in 2019.</p> <p>Furthermore, the share of all online retail sales is expected to normalise at around 24% in the UK, well-above the pre-Covid trend, and then will continue to grow. This demonstrates that the logistics and distribution sector is experiencing rapid growth, and the market along the M4 corridor is mirroring existing trends.</p> <p>In order to respond to this demand, and maximise economic growth and enhance opportunities for local job creation, the LPR should take account of the regional and national market trends relating to the logistics sector and allocate land adjacent to the strategic road network. NADAS proposes the Land at Newbury Showground as the most appropriate location to meet this strategic need given the access to both the M4 and A34.</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>A Landscape Sensitivity and Character Assessment (LCA) has been undertaken for the site. The LCA recommends that the whole site is not considered appropriate for employment, though part of the site could be developed subject to a number of requirements. The site is within the AONB, not related to an existing employment area, and largely open in character. The intrusion of more modern</p>

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	<p>A summary of the potential of the Land at Newbury Showground to accommodate a new logistics hub is set out within the next section of this document.</p> <p>These representations are accompanied by a Vision Statement which sets out the background to our client's interests on the Land at Newbury Showground, evidencing how the site can be delivered as a logistics hub to help meet the employment needs of the local area and responding to wider regional and national trends.</p> <p>The Vision Statement also identifies the key opportunities and constraints to development and presents a strategic design layout on the distribution of development across the site.</p> <p>The Land at Newbury Showground extends to approximately 52ha, and is located immediately to the north east of M4 Junction 13. Following the Society's decision to restructure its operations, a new use will need to be found for the Showground site. Given the site's ability to respond to the existing and growing demand in the logistics market through its excellent highway connections, an allocation for a strategic logistics hub is proposed. It is our client's view that the economic evidence underpinning the LPR fails to sufficiently account for regional and national economic needs, notably in relation to the chronic shortfall of B8 logistics and distribution uses along the M4 corridor and the significant anticipated growth that needs to be accounted for.</p> <p>In the context of finding new sites for logistics uses, the online PPG itself emphasises that such facilities are likely to require good access to strategic transport networks and access to appropriately skilled labour. It is our view that the scale and nature of a site to meet regional/national logistics needs is not appropriate to locate adjacent to the existing urban areas, and is best met directly adjacent to the motorway network.</p> <p>Our client owns the Land at Newbury Showground, which is adjacent to Junction 13 of the M4. The land is available for redevelopment as the Society is repositioning itself in terms of its response to its core aims and reducing its exposure to the costs associated with maintaining and operating such a large site.</p> <p>The site benefits from excellent highways connections, providing good road access across the south of England.</p>	<p>incursions, including large scale buildings, noise and lighting would erode the traditional and rural landscape character of the area.</p> <p>Therefore, there are focused design parameters to guide development on the area identified as suitable for development within the LCA. This includes retaining existing fields, including a landscape buffer, limiting the height of buildings, consideration of the roof profile, scale and colour of buildings, access, and light pollution.</p> <p>National Highways do not object to the impact of the proposal on the Strategic Road Network, however the Highways Authority do have concerns regarding impact on the local road and the sustainability of the site.</p> <p>The site promoters have confirmed that the site is no longer available, and therefore will not be progressed.</p>



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	<p>The site is generally flat, has a low risk of flooding and is free of any notable historic and ecological designations.</p> <p>The extent to which the AONB designation covers West Berkshire means that meeting the need identified for strategic logistics allocations is likely to require development within the AONB. Whilst the attributes of the AONB are recognised, this must be balanced against the fact that the Showground and the surrounding area contains a series of urban influences (which mainly relate to the strategic highway network, but also existing industrial/commercial development) which partly degrades this part of the AONB.</p> <p>The physical and locational advantages of this site, coupled with an identified and urgent need for new strategic logistics (B8) sites along the M4 corridor, are considered to justify the allocation of the site for a new logistics hub within the emerging plan.</p>	
Barton Willmore for Copas Farms (lpr2061)	<p>Our client owns land directly adjacent to the Beenham Industrial Area. The Beenham Industrial Area, which is also within our client's ownership, is an Existing Designated Employment Area (Appendix 6 of the Reg 18 document). This Designated Employment Area was originally designated (previously known as a 'Protected Employment Area') through the West Berkshire District Local Plan 1991 - 2006, and Beenham Industrial Estate is a collection of mixed B uses. At the time of writing the Beenham Industrial Estate is fully occupied and has remained at or very close to full occupancy during my client's ownership of the site.</p> <p>Our clients are promoting land, which they own adjacent to the Beenham Industrial Estate for a 15,000 sqm site extension of a mix of employment uses (Class E, B2 and B8) to provide smaller incubator/starter units, which would form a logical extension to the existing Beenham Industrial Designated Employment Area as explained in further detail below.</p> <p>The clients are aware that this land does lie within the AONB. However due to the surrounding employment context which is also well contained by existing vegetation located on the boundaries of the site, the flat topography of the site, and limited views from both into or out of the site; it is considered that this site does not have any landscape and scenic beauty and as such does not contribute to the AONB or warrant the need for any elevated landscape protection. The established boundary vegetation could</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation (BEEN11).</p> <p>The ELR comments that there are no industrial units available at Beenham. The zero-vacancy rate reflects the small nature of the industrial market in this location.</p> <p>A Landscape Sensitivity and Character Assessment (LCA) has been undertaken for the site. The LCA does not recommend the site as suitable for development. Although the site is located in proximity to the PEA it also lies adjacent to open countryside to the SW and SE. The two PRoW which both align the site provides good access to the countryside which retains a well intact rural character.</p>

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	<p>also be retained as part of any development proposal. It should also be emphasised that this site lies on the edge of the AONB which is not only seen in the context of the surrounding/adjoining large scale existing employment uses (such as the adjoining Marley brick works), but the site also lies within proximity (to the south of the site) of the built-up area of Aldermaston Wharf. Furthermore, in consideration of paragraph 172 of the NPPF, we would argue that employment uses at this site would not be considered 'major development' when taking into account its nature, scale and setting.</p> <p>Furthermore, it is considered that this is a sustainable location for employment uses. As indicated by the attached 'Local Facilities Plan', this site is accessed off the A4 which provides a direct route to the large conurbations of Reading and Newbury, in addition to the M4 (Junction 12 of the M4 is only approximately 7.5km from the site). The site is also less than a kilometre from Aldermaston Station whereby trains run hourly providing access to Reading and Newbury. Bus stops are also located within a kilometre of the site, located along the A4, whereby buses run two an hour (the 'Jetblack 1' route), again providing access to the conurbations of Reading and Newbury, and other local settlements including Thatcham and Theale.</p> <p>Our client therefore considers that 'land adjacent to Beenham Industrial Area' will support the existing employment uses at the Beenham Industrial Area, as an extension to this DEA, which will further assist the District in meeting its economic objectives, in particular, to provide space for smaller incubator/starter units. This approach is in line with paragraph 82 of the NPPF, by locating such uses adjacent to an existing DEA, that will assist in developing clusters or networks of knowledge and will also support the provision of storage and distribution operations in a suitably accessible location off the A4 and close to the M4. Paragraph 82 of the NPPF is also mindful of providing operations of a "variety of scales" and as set out above, my clients wish to support the vital role that smaller companies and businesses play in the District by providing new smaller units. The spatial approach here also meets the objective of draft policy SP20 which, as indicated above, states that employment development to meet the existing</p>	<p>In terms of impacts, including on the AONB, there would be a loss of open rural character and a grass field, typical of the AONB within this area; introduction of more modern inclusions including large scale industrial buildings, noise and external lighting adjacent to the two PRowS, and resulting adverse effect on their rural character and amenity value; and loss of open setting of mature trees. The site would join up two fragmented PEAs. Although there is potential to enhance the woodland character of the area this would also block the views into the AONB and across the area to the Kennet Valley side. Mew mitigation measures would therefore be visually damaging to this area.</p> <p>This site, Land at Beenham Industrial Estate is not proposed for allocation in the Regulation 19 version of the LPR, following landscape advice.</p>

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	<p>and future economic demands for business use will be directed to Designated Employment Areas.</p> <p>Draft Policy SP21 (Sites allocated for economic development) includes a list of extensions to DEAs for industrial, storage and distribution uses. On the basis of the above, our client considers that 'land adjacent to Beenham Industrial Area' should be included within the list of DEA's to be extended to support the District in meeting its employment needs, in particular the opportunity for creating space for smaller incubator/starter units. Our client considers that this land will be able to provide 15,000 sqm of floorspace all of which could be delivered within the plan period.</p>	
Pro Vision for The Wasing Estate (lpr2068)	<p>In relation to Larkwhistle Farm, Brimpton (full representation attached)</p> <p>Draft Policy SP21 sets out the sites allocated for economic development. It has identified just one site (Theale East Business Centre) for the delivery of new employment floorspace of 20,000sqm. This is well below the identified need of 65,000sqm. Identifying such a small proportion of the overall requirement is highly inadequate. The LPR should go further and identify sufficient deliverable sites to meet the employment needs of the District.</p> <p>Pro Vision</p> <p>We consider the site to be suitable as an employment site and should be considered as an identified employment site in the LPR.</p> <p>Larkwhistle Farm is within close proximity (approximately 600m) to Calleva Park, a Designated Employment Area and could be seen as an extension to this Area. Employment uses at the site would be compatible with the uses in the surrounding area, as described above and therefore would not result in conflict with these neighbouring occupiers.</p> <p>The site is of a sufficient distance away from existing residential development as well as there being intervening fields, meaning there would be no harm to residential amenity.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites. The policies also set out allocations to provide additional employment land to assist in meeting the District's needs over the plan period.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>The lies within the DEPZ for the AWE and following advice from the Emergency Planning Department, no site allocations are taken forward within the DEPZ.</p>

Respondent (with lpr ref)	Response	Council Response
Pegasus Planning Group Ltd for Greystoke Land (lpr2090)	<p>The Employment Land Review of August 2020 acknowledges that there is a demand for larger B8 distribution sites in close proximity to the M4 motorway junctions (paragraph 6). It is also identified that there is a current market shortage of industrial sites to meet needs (paragraph 12). In this context, the Employment Land Review estimates a need to allocate at least 16ha of industrial land (paragraph 6.65). The Employment Land Review is however clear that where a site is attractive to logistics it should be considered favourably even if it is in excess of this identified minimum need (paragraph 2.34) owing to the fact that logistics occupiers play a sub-regional or regional role and that as such they are likely to seek the most suitable and well-connected locations regardless of the very local demand (paragraph 2.33). The Employment Land Review highlights that Newbury has a stronger demand for industrial land than other locations in the Authority area (paragraph 4.94). It states that this is due to the fact that the demand in Newbury arises from regional and national occupiers attracted to the area due to its direct links to the motorway and access to the M3 and A339 which are factors that would also be desirable to the logistics sector. The Employment Land Review highlights that notwithstanding this strong demand at Newbury none of the promoted industrial sites are at Newbury. As a result the non-allocation of sites at Newbury to meet some of the identified minimum need for industrial land or the additional needs for logistics would result in an imbalance between the demand for and supply of industrial including logistics floorspace (paragraph 13). Therefore, the Employment Land Review is clear that opportunities for the delivery of industrial land should be allocated at Newbury to provide a balanced portfolio across the District and that opportunities to cater to the logistics market should be supported.</p> <p>The latter of these conclusions was reached even without taking account of the implications of the current pandemic (paragraph 1). The pandemic has had significant implications on the way in which people shop as is evident from the fact that online sales accounted for 27.9% of all retail sales in 2020 as compared to only 19.2% in 2019 according to the ONS. It is critical to acknowledge is that the issue can be observed both at the local and national</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>The ELR comments that the industrial market across West Berkshire is performing well, with low vacancy and a tight supply for smaller units (up to 5,000sqm) which sees the most take up activity. Whilst there is demand for larger B8 distribution this tends to be at the motorway junctions, particularly at Theale. Occupiers across all building sizes range from local to national businesses and covering a wide variety of business activity with no specific sector driving demand. The Covid19 pandemic has strengthened the industrial market further, with strong demand resulting in an increasingly constrained market.</p> <p>A Landscape Sensitivity and Character Assessment (LCA) has been undertaken for the site. The LCA does not recommend the site for development. The site is within the AONB, not related to an existing employment area. There would be a loss of open character and grass fields, which forms part of the mosaic of fields within this area; erosion of the rural character of Priors Court Road, the PRoW, Ashfield's Farm Industrial Estate and Cottages, by the introduction of modern buildings eroding the rural character of the area. This in turn adversely impacts on the AONB. An increased level of development, external lighting and noise levels would erode the rural qualities and the open character of the area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>scale. Accordingly, the need to allocate land suitable for logistics will have increased significantly to cater to this growing demand.</p> <p>According to Reuters<sup>1</sup>, the warehousing sector had witnessed a sustained growth nationally and worldwide before the pandemic. The British Retail Consortium identified that the pandemic has only accelerated the transformation of an already changing industry and highlighted the underlying reasons for this change including the availability of technology and its impact on how people shop as well as growing costs for the retail sector. This sustained growth and the recent spike due to COVID-19 has resulted in an additional demand and premium on a warehouse space. This is highlighted in the RICS Commercial Property Market Survey from Q2 of 2020<sup>2</sup> which indicated that the prime industrial rents have marked a 2% growth and outperformed the sector at the national level and within each region/country of the UK. The figures from first half of 2020 brought a record 14.6m sq ft of warehouse floorspace transacted across the country, which is already 14% above the average in the first half of any previous year notwithstanding that the results do not yet reflect a full half-year. It is anticipated that the long-term structural trends, including the growth in online shopping, urbanisation and the need for data centres to support the digital economy will continue into the future and may even be strengthened by the pandemic.</p> <p>.</p> <p>The Reuters report also identifies that the constrained supply of warehouse and industrial land presents a real challenge especially over the next five years.</p> <p>The demand for such uses could be strengthened by the UK's departure from the EU. The UK's recent departure has significant implications for the way in which businesses operate particularly so for those businesses that import or export to and from the EU. As a result, businesses are likely to require a greater amount of warehousing floorspace including to secure the necessary supply to support their continued operation. Accordingly, not only as a result of underlying structural trends but also as a direct result of both the pandemic and the UK's departure from the EU the demand for industrial and logistics floorspace is likely to be greater than identified in the</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Employment Land Review which has not taken these latter factors into account.</p> <p>Notwithstanding the fact that the Employment Land Review has not reflected these changing circumstances, it nevertheless recommends firstly that sites attractive to the logistics sector should be considered favourably even where these are in excess of the identified minimum need (paragraph 2.34) and secondly that there is a particular demand for industrial floorspace in Newbury (paragraph 4.94).</p> <p>These recommendations of the Employment Land Review are however not reflected in the Site Selection Background Paper which simply responds to the need to allocate 16ha of industrial land without taking account of the need for sites at Newbury and the need to support additional opportunities for logistics development. This has informed Policy SP21 which does not reflect the evidence of the Employment Land Review and as a result is unsound. In particular, it does not:</p> <ul style="list-style-type: none"> <li>• Allocate industrial sites at Newbury which are necessary to provide for the balanced portfolio alluded to in the Employment Land Review.</li> <li>• Allow for the favourable consideration of sites attractive to logistics as recommended by the Employment Land Review. Instead, it does not provide any framework for the consideration of planning applications for such uses. Policy SP21 is therefore not positively prepared, justified by reference to the Employment Land Review or effective in meeting the demand for logistics. Whilst the Employment Land Review was prepared in the absence of any sites being promoted at Newbury, Greystoke Land now wish to promote the site at Land North of Newbury Showground which responds precisely to the needs identified in the Employment Land Review as it is located close to Newbury, adjacent to a junction of the M4, and offers an attractive location for logistics. The only constraint which affects this site is that it is located within the AONB.</li> </ul> <p>As set out above, the Council's evidence demonstrates a need for industrial development at Newbury in close proximity to the M4 junction and a particular need to support the delivery of sites attractive to the logistics</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>market. It is also evident that the demand in Newbury arises from regional and national occupiers attracted to the area due to its strategic location. The Council's evidence also indicates that there is no scope for meeting this need elsewhere and insofar as any environmental harms would arise from the development of the Land North of Newbury Showground these would be outweighed by the benefits of meeting the need. As a result, the allocation of this site would accord with paragraph 172 of the NPPF.</p> <p>The Employment Land Review (paragraph 6.65) and Policy SP21 suggest that there are exceptional circumstances to justify the allocation of Land West of Ramsbury Road, Membury notwithstanding that this part of the District has low market attractiveness. The same conclusion must be reached with respect of Land North of Newbury Showground which responds precisely to the needs identified in the Employment Land Review both in terms of location and use unlike the proposed allocation at Land West of Ramsbury Road.</p> <p>In order to make Policy SP21 sound, two amendments are necessary as follows:</p> <ul style="list-style-type: none"> <li>• A site or sites will need to be allocated at Newbury to provide a balanced portfolio of sites, including the Land North of Newbury Showground. A location plan for this site is appended to these representations.</li> <li>• An additional paragraph should be added to the Policy to identify that applications for sites which are attractive to logistics will be considered favourably as set out in the Employment Land Review.</li> </ul>	
<p>Savills for Lambourn Business Park (lpr2105)</p>	<p>We write on behalf of Lambourn Business Park. The Park provides office, storage and industrial space, south of Lambourn itself in Lambourn Woodlands (close to Membury). The Business Park focuses on providing flexible, cost effective accommodation for local businesses. It enjoys a strong location between Swindon and Newbury and close to Junction 14 of the M4. Full details can be seen at <a href="http://lambournbusinesspark.co.uk">lambournbusinesspark.co.uk</a>.</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The estate was formerly known as Lowesdon Works but has since been rebranded. Accordingly the site is identified as a Designated Employment Area (Appendix 6) as Lowesdon Works and we would request that the Local Plan is updated to identify the site as Lambourn Business Park. We support the identification of the site as a Designated Employment Area. However, we request that the Local Plan Review reflects the contribution that the Lambourn Business Park could make to the West Berks economy. We note that the Local Plan Review suggests extensions to various Designated Employment Areas at Thatcham, Aldermaston and the Membury Industrial Estate at Lambourn Woodlands. There appears to be no justification as to why these Designated Employment Areas are considered to be appropriate for expansion whilst the Lambourn Business Park is not considered appropriate. We consider that the Lambourn Business Park is entirely suitable for expansion and indeed enjoys an extant planning permission for new building. The Local Plan Review should be updated to reflect this.</p> <p>There are two potential areas for expansion at the Lambourn Business Park. The first area (shown in blue) would expand the site up to the built form and tree boundary at the western edge of the site. Most of this land benefits from an extant planning permission for development (planning reference APP/W0340/A/12/2177100 (LPA ref 11/01822/OUTMAJ) for erection of buildings to accommodate "increased storage and warehousing facilities and ancillary training and office facilities, associated car parking, landscaping, surface water drainage storage, and associated works"). At the very least, the Local Plan Review should be updated to reflect the extant planning permission.</p> <p>Additionally there is the potential to expand the Lambourn Business Park southwards as far as the existing southernmost part of development (shown in green).</p> <p>The expansion of the Lambourn Business Park would contribute to the identified need for c60,000 sq m of industrial floorspace over the plan period. It would build on the success of an existing Designated Employment Area in a location that has proven to be successful. Additional floorspace at the</p>	<p>selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>The ELR commented that the existing employment space is fully occupied, and a mix of mostly light industrial and some office. To support the creation of job opportunities in the more western rural areas the ELR recommended that PEA boundaries could potentially be extended at the Membury Estate. The context of the AONB needs to be considered.</p> <p>Landscape Character Appraisal to inform the Lambourn Neighbourhood Development Plan (2020): the appraisal provides a more detailed assessment of Lambourn Parish. The site is located within the Wooded Downlands (LCA2), described as an area comprising of arable fields and multiple stands of woodland that very likely formed a much bigger area of continuous woodland. Recommendations to plan, manage and protect distinctiveness of LA2 include ensuring that the Sites of Special Scientific Interest (SSSI) remain in 'favourable' condition, and that grassland habitats are conserved and enhanced; conserving and enhancing biodiversity value through protection of the SSSI, Local Wildlife Sites and priority habitats and seek opportunities for maintaining/enhancing connectivity between these sites/ habitats; protect the rural setting and secluded nature of settlements and farmsteads; the settlement patterns throughout the area is dispersed and very low density; its character is enclosed and in harmony with the landscape.</p> <p>The site is located outside of any settlement, however the eastern part of the site lies within an existing Protected Employment Area (renamed Designated Employment Areas (DEA) through the LPR) (Lowesdon Works Industrial</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Lambourn Business Park would give the employment area greater critical mass and increase its attractiveness to local businesses. Other employment areas within West Berkshire have been identified for expansion and there is no reason why the Lambourn Business Park should not also be considered.</p> <p>The NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity (paragraph 80). Paragraph 84 states that planning policies and decisions should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements. The identification of a small expansion of Lambourn Business Park would accord with those policy objectives.</p>	<p>Estate/Lambourn Business Park) and comprises of various industrial uses. The site was previously a World War II camp, and the western part of the site retains some of the redundant World War II buildings.</p> <p>Given the location of the site within the AONB a Landscape Sensitivity and Capacity Assessment has been prepared to establish if development on the site would result in significant harm to the natural beauty and special qualities of the AONB could be overcome. The assessment concludes that development across the western area of the site and redevelopment within the existing PEA would be acceptable certain to the following mitigation measures: The Local Plan will be updated to reflect the change in the name to Lambourn Business Park.</p> <p>The ELR acknowledges that the site was promoted through the HELAA for residential. The retention of the employment floor space is considered, and provides a valuable employment resource in the rural west (Appendix A – Site Assessments, Existing Sites). It was recommended to safeguard the site. The existing Designated Employment Area will be retained. However, although the planning permission to extend the site to the west has been implemented by way of constructing the access, no other works have been undertaken.</p> <p>The extant planning permission has been considered, and a Landscape Character Assessment (LCA) commissioned. The visual and landscape sensitivity is low to medium, and as the site is within the AONB the landscape value is medium to high. The landscape capacity is therefore low to medium.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>The site is located in the AONB, and the LCA noted that the site sits in a poor quality landscape, with poor quality buildings. The site is in an elevated position and visible from public rights of way. The site is set back from the B4000 and well enclosed within woodland.</p> <p>The site (at the time of the LCA) has a semi derelict character with no landscape features of value, and potentially development could enhance this area of the AONB, with mitigation measures to include tree planting. Tall, large scale buildings would be out of character with the landscape resulting in an adverse impact. Increased site traffic could impact on noise levels. External lighting could impact on dark skies and further light pollution in the AONB. Development across the western part of the site and redevelopment within the existing PEA could be considered subject to mitigation regarding landscaping and tree planting, limitation of building heights, and restriction of external lighting.</p> <p>It is acknowledged that recent planning permissions on the site have resulted in the demolition of buildings – the Council will monitor this site going forward.</p> <p>As part of the evidence base which informs the Local Plan Review the Council has undertaken a review of the District's Protected Employment Areas, to be renamed Designated Employment Areas (DEAs). As part of this work, the Lambourn Business Park site including the parcels of land identified within this representation has been considered and subject to a landscape sensitivity and capacity assessment. The conclusions of the DEA review work and Landscape Sensitivity and Capacity Assessment will be published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
DHA Planning Ltd for Lee Chapman (lpr2109)	<p>In reference to EMP4 (full rep attached). We refer to the Draft allocation and the main objective of this submission is to support the allocation. However, we do ask that the whole of the former raceway site is included in the allocation.</p> <p>Our request to extend the economic development area to include the southern part of the site is supported by a strong evidence base. An evidence base which has been tested and validated by Ecological and Arboricultural consultants.</p> <p>We therefore formally request that the Policy allocation is extended to encompass the “developable area” as shown on the attached plan, with the potential floorspace figures adjusted to the table as set out on the plan.</p>	<p>Comments noted.</p> <p>It is recognised that outline planning permission has been granted. A reserved matters application has yet to be submitted. As the site is within close proximity to the Aldermaston Atomic Weapons Establishment there is an objection to the allocation of the site as an inclusion in the designated employment area. Whilst there is outline planning permission for employment development there is no reserved matters application in or determined. Whilst this may happen at this point in time the site cannot be factored in to the offsite emergency plan and therefore, at a plan making level, attracts an objection from emergency planning and the ONR.</p> <p>The lies within the DEPZ for the AWE and following advice from the Emergency Planning Department, no site allocations are taken forward within the DEPZ.</p>
Pegasus Planning Group for Walker Logistic Ltd (lpr2295)	<p><i>(In relation to EMP5, Land West of Ramsbury Road, Membury Industrial Estate)</i></p> <p>Walker Logistics (Holdings) Ltd. are pleased to see that the recommendation to allocate 'Land West of Ramsbury Road' for industrial, storage and distribution uses has been carried through to the Emerging LPR and that WBC have been proactive in allocating sufficient floorspace, as identified in the ELR, to adequately support economic growth in WBC.</p> <p>The designation of EMP5 will make an important contribution to the identified need for employment floorspace within West Berkshire.</p> <p>To confirm that the site is owned by Walker Logistics (Holdings) Ltd., it is in a suitable and sustainable location for development and is therefore a viable and deliverable option.</p> <p>Walker Logistics is primarily an e-fulfilment and value added services supply chain business. They manage the storage and fulfilment requirements of circa 45 businesses operating in fast moving commercial goods industries and have been operating from the Membury Industrial Area since 1999. Their operations which commenced on site in the 1990's are currently at</p>	<p>Comments noted.</p> <p>Information on deliverability and viability is noted.</p> <p>The Local Plan is landscape led, and the AONB covers 74% of the District. The primary purpose of the AONB designation is to ‘conserve and enhance the natural beauty of the area’, as set out in the Countryside and Rights of Way Act 2000. The Council has a duty to have regard to the primary purpose of designation. The AONB is a constraint to development, and as advocated in the NPPF, major development should only be permitted in exceptional circumstances. Given the objections received, as outlined above, further assessment on the effects of the landscape has been undertaken. The recommendations are to limit the development to a focused area, reflecting that set out within the Landscape Sensitivity and Capacity Assessment</p>

Respondent (with lpr ref)	Response	Council Response
	<p>capacity at Membury and, to continue to grow the business, require additional warehouse floorspace. Hence a planning application (Ref. 19/02979/OUTMAJ) was submitted in November 2018 for an additional unit.</p> <p>The Covid-19 pandemic has intensified the need for additional floorspace, The head count of employees at Walker Logistics has increased by over 50% since April 2020 and currently stands at a FTE of 160 operatives. The draft site allocation would help support Walker Logistics, to remain at Membury, continue to employ a significant quantum of local employees and to contribute to maintaining a strong rural economy through their continuous corporate agenda of utilising local suppliers where possible. The draft site allocation is a further endorsement, led by WBC, of the site's suitability based on matters relating to its location, contribution to the AONB and accessibility. However, these should be considered separately from and in isolation of the current application (Ref. 19/02979/OUTMAJ). The outcome of the application will be known in advance of confirmation of the Local Plan allocation through the Local Plan process. The sites proposed for allocation for employment uses under Draft Policy SP21 predominantly comprise extensions to existing DEAs. This is the correct approach. It is logical to review the boundaries of existing development areas where they are adjacent to DEAs; such sustainable extensions would ensure efficiencies are maximised and that development is best or properly integrated with functioning employment areas. The draft allocation (EMP5) would:</p> <ul style="list-style-type: none"> <li>a) Form a natural, high quality extension to the existing DEAs immediately to the north and south;</li> <li>b) Enhance efficiency of existing business operation and reduce unnecessary congestion on the highway network;</li> <li>c) Result in significant economic and social benefits, including new inward investment (construction and supply jobs) and generating new local, long-term jobs.</li> </ul> <p>On the basis it would not be possible to amend the AONB boundary to exclude the site, it is wholly appropriate to allow sustainable businesses to locate/grow in AONB in instances where the economic benefits outweigh any adverse impact on the AONB. It is crucial that the AONB landscape</p>	<p>and subject to design parameters. These would be factored in to the proposals map and the updated policy. The likely floorspace would be decreased from what is set out in the draft policy. At this stage is it not considered that the development of the whole site, or a floorspace of 40,000 square metres would be appropriate.</p> <p>The former runway forms part of the established history, character and landscape of the Membury airfield. Development on this part of the site would not be appropriate.</p> <p>The developable area, as recommended in the LCA, could deliver some 17,600 square metres of employment space, taking into account the standard plot ratios as set out in the HELAA. This still provides some flexibility over and above what planning permission has been granted for.</p> <p>However, it is recognised there are restrictions as per the planning application, and given these and the landscape buffer recommended in the landscape assessment, the allocated floorspace would be 10,381sqm.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>designation does not constrain development which would otherwise result in significant economic and social benefits for rural communities. And in this respect it comes down to the specific circumstances of the site and the contribution that it makes to the character and appearance of the AONB. In terms of EMP5, the site is well-contained by existing buildings and any development would 'infill' an existing gap between developed (PEA) sites to the north and south. In addition, part of the site includes a former runway, which comprises concrete/hardstanding, the visual amenity of which is not of benefit to the AONB.</p> <p>Development on the site (EMP5) would be master planned to ensure that there would be no harm to the role of the wider AONB. An appropriate landscape strategy could also be secured at application stage, to ensure substantial screening is provided.</p> <p>Walker Logistics (Holdings) Ltd. do not seek any changes to the draft site allocation (EMP5) in terms of the proposals map. We are aware of the reference to 27,600sqm floorspace set out in draft Policy SP21. The current application (Ref. 19/02979/OUTMAJ) cannot be used as a guide to influence the scale and form of development that can come forward particularly as it is in outline nature and siting is not a detailed matter. The entire allocated site can be developed more efficiently in terms of siting of buildings across the entire draft allocated site. Having regard to need for sufficient car parking and servicing yard space for deliveries as well as landscaping early feasibility studies have indicated the scope for up to 40,000sqm of mixed light industrial, industrial and storage/logistics warehouse accommodation could be delivered on the site.</p>	
AWE (lpr2299)	<p><i>See attachments for full response.</i></p> <p>AWE's comments build on existing policy support for development at AWE's sites at Aldermaston (AWE A) and Burghfield (AWE B) around Policy SP21. Reference is also made to Policy SP4 to ensure internal consistency between the policies in the Local Plan and to facilitate comprehensive, rather than piecemeal, plan-making for the proper sustainable planning of the area.</p>	<p>Comments noted.</p> <p>The Regulation 19 version of the LPR will contain a specific policy for AWE Aldermaston and Burghfield (Proposed Submission LPR Policy DM33). It is agreed that the sites should not be Designated Employment</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Disagree in part. The draft policies do not go far enough. Express policy support is required for development at AWE A and AWE B, taking forward the proposals for a bespoke policy designation for these sites in current Core Strategy Policy CS9 (b).</p> <p><b><u>Executive Summary</u></b>  The Local Plan should provide direct policy support for development at AWE A and AWE B. This is required to allow AWE efficiently to develop, modernise, rationalise and consolidate its estate footprints in accordance with the Government's investment programme, which responds to the Government's policy commitment to a nuclear deterrent for the UK. The additional Local Plan policy put forward by AWE in this representation would ensure that the Local Plan contains a planning policy, in accordance with National Planning Policy Framework (NPPF) paragraphs 95(b) and 182, to sustain, protect and promote the established strategic uses at the two sites and their important national security and local employment functions. Without such a policy, the Local Plan is unsound, does not reflect the requirements of Local Plan CS Policy CS9(b) and/or the NPPF.</p> <p>In addition to having a bespoke policy to support appropriate development at AWE A and AWE B, there is a clear need to protect AWE A and AWE B from inappropriate development in the DEPZ and/or the OPZ, particularly given the agent of change principle set out in the NPPF.</p> <p><b><u>Current position in the emerging Local Plan</u></b>  Currently, there is no direct policy support for sustaining, protecting and promoting the integrity and purpose of the existing strategic, locally and nationally significant sites and development at AWE A or AWE B.</p> <p><b><u>Function of Policy SP4 (AWE Aldermaston and Burghfield)</u></b></p> <p>AWE is supportive of the public safety-focussed nuclear installation safeguarding Policy SP4, which is proposed to supersede the existing safeguarding Policy CS8. The Detailed Emergency Planning Zone (DEPZ) (where no development is likely to be acceptable) and Outline Planning Zone (OPZ) [<i>Footnote 1: The draft Plan refers to an Outer Consultation Zone (OCZ) which is the term used in ONR's guidance; see <a href="http://www.onr.org.uk/land-use-planning.htm">http://www.onr.org.uk/land-use-planning.htm</a>. However, the Radiation (Emergency Preparedness and Public Information) Regulations 2019 has</i></p>	<p>Areas, as the nature of operations at the AWEs are specific to the AWEs themselves.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>introduced the "Outline Planning Zone (OPZ)". We would therefore recommend that this term is used in the Local Plan in lieu of OCZ. We expect the ONR will be updating their guidance so the outer consultation zone is linked to or replaced by the OPZ. As the OPZ is a defined area this gives all stakeholders more certainty what the zone is.]</i> (where consultation with the Office of Nuclear Regulation (ONR) is required to ascertain acceptability) "safeguarding zones" for AWE A (Figure 3) and AWE B (Figure 4) follow latest advice from the ONR and are supported on this basis. Policy SP4 recognises the land use implications of the two licenced nuclear installations at AWE A and AWE B, for future development in the area. Policy SP4 also recognises the need to consult ONR, as a body with sufficient technical experience, to advise on future land use compatibility issues and risks. However, it does not recognise or support AWE's known land use and development needs at AWE A or AWE B.</p> <p><b>Function of Policy SP21 (Sites allocated for economic development)</b> There is some (albeit limited) support for development at AWE A and AWE B in the supporting text to the draft Local Plan, in particular, around Policy SP21.</p> <p>Policy SP21 designates certain additional areas as Designated Employment Areas (DEAs), renaming and expanding upon the existing designated areas in the Local Plan, currently known as Protected Employment Areas (PEAs). Policy SP21 should be interpreted and applied alongside Policy DC 31 (DEAs), which explains how planning permissions should be determined in DEAs.</p> <p>Supporting paragraph 4.12 (which provides support for the local planning authority's overall spatial strategy) recognises that AWE A and AWE B, which fall within the "Eastern Area" of the draft Local Plan, are important providers of local jobs in this area and the plan area as a whole. In recognition of the job creation potential of the sites and their strategic importance to the District's economy, supporting paragraph 7.14 (which supports Policy SP21) provides that:</p> <p><i>7.14 Development will also continue to be supported on existing, non-DEA,</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>employment sites, particularly on those sites seen as strategically important for the District's economy, such as the Atomic Weapons Establishment (AWE) at Aldermaston and Burghfield.</i></p> <p><b>Whilst this supporting paragraph provides oblique policy support for development at AWE A and AWE B, it does not sufficiently sustain, protect or promote AWE's locally and nationally significant operations, or the future regeneration needs of the sites in line with the Government's investment programme.</b></p> <p><b><u>Current position in the adopted Local Plan</u></b></p> <p>AWE notes that current Local Plan Policy CS 9 (b) envisaged that AWE A and AWE B would either be allocated as PEAs during the plan period, or be subject to an alternative "bespoke" designation consistent with their importance to the local economy, as follows:</p> <p><i>Business development will be supported on existing employment sites, particularly on those sites seen as strategically important for the District's economy – New Greenham Park, Vodafone HQ, and the Atomic Weapons Establishment (AWE). The Site Allocations and Delivery DPD will assess the role and function of these three sites to determine whether they should be designated as Protected Employment Areas or an alternative bespoke designation consistent with their importance to the local economy.</i></p> <p><b><u>Need for bespoke designation</u></b></p> <p>AWE A and AWE B have not been designated as PEAs (or now, DEAs), nor - in AWE's view - should be. However, the Local Plan Review process should put forward an "alternative bespoke designation", in recognition of the sites' importance to the local economy and to national security, and to make the Local Plan consistent with Policy CS9(b) and, in any event, NPPF paragraphs 95 (b) (supporting development required for operational defence and security purposes) and 182 (reducing restrictions on existing businesses and facilities / agent of change).</p> <p><b><u>Not a DEA</u></b></p> <p>As above, AWE does not consider that AWE A and AWE B should be designated as general employment areas. Policies SP21 and DC31 are focused principally on proposals for new employment land in a "civilian" capability context and are relatively rigid in their operation.</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>By contrast, there is a need and compelling case for a stand-alone bespoke policy designation for these sites to support Government research, training and defence related activities and associated and ancillary development at AWE A and AWE B, which will (in line with supporting paragraph 7.14) help preserve the strategic significance of these sites to the District's economy. This kind of policy, in addition to being required under Policy CS9(b) and the NPPF, is broadly consistent with the approach taken, for example, to the Theale Rail-Road site, which is expressly safeguarded under Policy DC 31, for industries requiring a rail-road transfer facility.</p> <p>AWE's land use requirements and aspirations for AWE A and AWE B are much more dynamic, reflecting the mix of buildings and uses on the sites and the Government's investment programme which is focussed, inter alia, on enhancing the sites' science, research and development capabilities together with related production facilities. On this basis, AWE is putting forward a bespoke policy suitable for development at Government research and defence establishments such as AWE A and AWE B.</p> <p><b><u>Proposed Bespoke Policy for AWE A and AWE B</u></b></p> <p><i>“Development in the following categories will be supported:</i></p> <ol style="list-style-type: none"> <li><i>1) New development comprising the construction of new buildings [Footnote 2: Buildings include: all built development, structures, plant and equipment] extensions or other refurbishments to existing buildings</i></li> <li><i>2) Redevelopment, conversion or change of use of redundant buildings</i></li> <li><i>3) Enabling works in connection with 1) and 2) above</i></li> </ol> <p><i>Uses in the following categories will be supported:</i></p> <ol style="list-style-type: none"> <li><i>4) Offices</i></li> <li><i>5) Uses in connection with science, research and development</i></li> <li><i>6) Manufacturing, waste management and storage</i></li> <li><i>7) Energy and infrastructure to support, maintain and service the sites</i></li> <li><i>8) Uses associated and ancillary to 4) to 7) above</i></li> <li><i>9) Temporary land uses with construction, environmental and amenity functions required in connection with site optimisation and phased delivery of development</i></li> </ol>	

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	<p><i>Development outside of AWE A and AWE B will be assessed against Policy SP4. Development in the DEPZ is likely to be refused planning permission, especially where the ONR has advised against that development [Footnote 3: AWE notes that Policy SP4 states that the residential development in the DEPZ "is likely to be refused planning permission"; AWE prefers this formulation to draw out the presumption in favour of refusal albeit it recognises that some development may be deemed acceptable.]. In the OPZ, development proposals will be considered in consultation with the ONR, in accordance with the criteria set out in Policy SP4."</i></p> <p><b><u>Supporting Text</u></b></p> <p><i>"AWE A covers an approximate area of 750 acres. The site occupies a former World War II airfield and now houses advanced research, design and manufacturing facilities and associated services and development.</i></p> <p><i>AWE B covers an approximate area of 225 acres. The site occupies the former Royal Ordnance Factory dating from 1940. The site includes numerous buildings and structures used for a variety of industrial processes including warhead assembly and decommissioning and associated services and development.</i></p> <p><i>As identified in paragraph 7.14 of this Plan, AWE A and AWE B play a strategic role in the District's economy and they also serve an important national security function.</i></p> <p><i>AWE A and AWE B are owned by the Secretary of State for Defence and deliver the warhead contribution to the nationally and internationally significant UK nuclear deterrent. AWE has been at the forefront of the UK nuclear deterrence programme for more than 60 years by supporting the UK's Continuous at Sea Deterrence programme.</i></p> <p><i>The Government's policy of continuing to maintain a UK nuclear deterrent was most recently confirmed, on 25 February 2020, in the Secretary of State's announcement of a programme to replace the UK's nuclear warhead. It was also confirmed in the Strategic Defence and Security Review 2015 (SDSR). AWE A and AWE B are therefore required to fulfil their unique functions for the foreseeable future – until at least 2040. (In the event that</i></p>	

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	<p><i>this role were to cease, the sites would require several decades of nuclear decommissioning, necessitating development activities consistent with this policy).</i></p> <p><i>Reflecting this policy, the Government is committed to an investment programme for the replacement and refurbishment of the ageing facilities at AWE A and AWE B. This investment programme is centred around a vision for two high quality campuses of excellence, investing, in particular (but without limitation), in the production, science and research and development capabilities at the two sites. The Government's commitment to investment in AWE A and AWE B has been consistently demonstrated since 2005 and is reiterated in the SDSR.</i></p> <p><i>This policy recognises the strategic significance of the AWE A and AWE B sites to the local economy, as well as to national security. It also recognises the need to renew the existing facilities at AWE A and AWE B to optimise the sites' operational capabilities, particularly (but without limitation), their production, science, research and development capabilities - in order to attract and retain the world's best researchers, scientists and engineers. This policy therefore seeks to facilitate the efficient and sustainable development, modernisation, rationalisation and consolidation of uses and operations at AWE A and AWE B, to help sustain or enhance their operational capability and in particular to nurture science, research and innovation at the sites in line with the Government's investment programme. The strategic purpose of the policy is to attract positive socio-economic multiplier effects in the local economy, in terms of jobs, skills and inward investment.</i></p> <p><b><u>Local Development Order</u></b></p> <p><i>Consistent with this policy the Council will be supportive of proposals for a local development order (LDO) for each of the AWE A and AWE B sites (or a single LDO with bespoke plans and development constraints for each of the sites), to further speed up decision-making for more routine operational development and changes of use within defined design, size, scale, land-use and other environmental parameters. The Council recognises LDOs as a positive and proactive planning tool which help simplify the planning</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>process, create a more certain planning environment and thereby make investment more sustainable, responsive and attractive.”</i></p> <p><b><u>Illustrative Framework Plans for AWE A and AWE B</u></b></p> <p>This representation is accompanied by two site development context "Illustrative Framework Plans" for AWE A and AWE B together with the supporting Site Analysis and Vision report. The Illustrative Framework Plans have been subject to stakeholder involvement and were presented to the AWE Local Liaison Committee on 4 July 2018 and 13 March 2019. The plans and the report illustrate how the Government's investment programme will be accommodated within the two estates and give an indication of potential land uses up to and beyond 2030.</p> <p>The Illustrative Framework Plans are intended to help the local planning authority visualise the Government's aspirations for two high quality campuses of excellence at AWE A and AWE B, designed to attract and retain world leaders in the fields of science of engineering. The Site Analysis and Vision report exemplifies how sustainability and amenity are at the core of the Government's vision.</p> <p>The Illustrative Framework Plans are intended to inform future planning applications submitted to support the sites' operational capabilities. They also, together with the Site Analysis and Vision report demonstrate how design [<i>Footnote 4: Including a design guide or code, in line with new paragraph 128 in the Government's January 2021 consultation on the NPPF, which provides that design guides and codes "can be prepared on a site-specific scale" and recognises that "applicants may also elect to prepare codes for a site which they propose to develop".</i>] and other environmental parameters could easily be worked up in support of a LDO or LDOs for AWE A and AWE B permitting more routine redevelopment proposals at the two sites.</p> <p><b><u>Cross referencing to other emerging Policies</u></b></p> <p>At a minimum, the above policy should be cross referenced at:</p> <ul style="list-style-type: none"> <li>• Paragraph 4.13, which explains the opportunities and constrains presented by AWE A and AWE B in the Eastern Area.</li> <li>• Paragraph 7.14, which provides indirect support for development on non-DEA employment sites such as AWE A and AWE B.</li> </ul>	

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	<ul style="list-style-type: none"> <li>Policy SP4, as the new policy helps reinforce the importance of the DEPZs and OPZs in Policy SP4. AWE suggest incorporation a new supporting paragraph 4.37: “4.37 New development and uses at the AWE A and AWE B will be assessed in accordance with Policy [Bespoke Policy for AWE A and AWE B]”</li> </ul> <p><b>Other comments</b></p> <ul style="list-style-type: none"> <li>Note comments made in relation to the term "OPZ vs OCZ and explanation in footnote no. 1</li> <li>Note definition of "buildings" in footnote no. 2</li> <li>Note also the preferred formulation of Policy SP4 as explained in footnote no.3</li> </ul>	
Dijksman Planning LLP for Northway Porsche (lpr2300)	<p>The Absence of Northway Porsche and Associated Land from Beenham DEA</p> <p>Extension to Beenham Designated Employment Area - I am objecting to policy SP 21 on the grounds that it does not include a 2.68 ha enlargement of the Beenham Designated Employment Area (as defined under the previous policy SC9).</p> <p>Land Surrounded on three sides – The current protected employment area encloses a parcel of land containing Northway Porsche, the designated site wraps around it on three sides.</p> <p>Existing employment site - Of the subject 2.68 ha, Northway Porsche's existing premises cover 0.75 ha. The balance of the land - 1.93 ha - is currently used for equestrian purposes and includes an outdoor arena.</p> <p>Visually and Physically Enclosed - This parcel of land is visually and physically entirely enclosed and visually and physically closely related to the surrounding employment land.</p> <p>Specialist Classic Car Services - Northway Porsche is in a unique position to be a catalyst for this proposal. As an important and long-established specialist car restorer and classic car engineering company, it provides high value classic car services and is a significant regional operator within this industry. The expansion of the employment area (on the land associated with Northway Porsche) would enable the creation of a specialist</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>The ELR 2020 commented that Beenham has a small cluster of mostly general industrial uses, and has no industrial units available. The area has a medium market attraction in the East of the District.</p> <p>The provision of industrial space has been consistently strong over recent years, and both trend-based projections and economic forecasts indicate growth in industrial space. The ELR 2022 therefore recommends a minimum industrial requirement of 90,730sqm or 23 ha of land to 2039 to meet identified needs. Given this need and as sites originally proposed for employment uses around</p>

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	<p>concentration, and employment hub, for Classic Car Based Restoration and Associated Automotive Services.</p> <p>Valuable Sector UK Economy – With an annual turnover of £18 Billion, and an annual Gross Value Added contribution to the UK economy of £9 Billion Classic Cars make a very significant contribution to our economy. As a specialist engineering and employment sector Classic Cars and associated parts provision, restoration, and servicing, all benefit from being in close proximity to one another.</p> <p>Automotive Restoration and Engineering Hub - The creation of a concentration of automotive restoration businesses will be hugely beneficial in economic development terms, the employment generated is highly skilled. In sustainability terms it is beneficial if the classic vehicles can be restored and repaired in one location.</p> <p>Sustainability Benefits and Reduced Travel - Specialist services such as break engineering, engine tuning and repairs, manufacture of parts, upholstery restoration and leather repairs and servicing, wheels and bodywork restoration are all services scattered across this district and beyond, and all may all be required in the restoration of a particular individual classic car. The transportation of such cars to numerous locations to deal with various elements of restoration, and/or the travelling of specialists and relevant parts to one location, all generate traffic movements and takes time, which would be more efficiently and sustainably arranged if these specialist services are located in one place.</p> <p>Existing Establish Boundary and Security Fencing - The land involved is capable of being subdivided into the necessary parcels for different businesses without having any material impact upon the landscape due to the existing industrial development on three sides and the existing substantial boundary screening and security fencing.</p> <p>Recent Permissions - Planning permissions (19/03096/FUL &amp; 19/03097/FUL) have recently been granted for a new car restoration building at Northway Porsche and the change of use of the former house into associated office space.</p> <p>Permitted Access Improvements - These permissions have required the upgrading of the access to this land from Grange Lane. The approved scheme of access improvements has been specifically designed to</p>	<p>Aldermaston are not suitable further work has been undertaken to seek sites to meet the need.</p> <p>As the site is within the AONB further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA). The LCA for the site recognises that the site lies adjacent to open countryside, and two PRoWs which align the site provides good access to the countryside which retains a well intact rural character. There would be a loss of open rural character and area of grass fields, and introduce more modern inclusions, affecting the rural character and amenity value, in turn affecting the AONB. There is potential to enhance the woodland character of the area, which would aid in integrating the site into the landscape. The LCA recommends that development across the site could be considered with mitigation measures, including a landscape buffer, retention of open setting, suitable boundary treatments, suitable design of buildings, external lighting, and noise levels.</p> <p>In consideration of the landscape advice, and no adverse comments from service providers, to aid in meeting the industrial needs it is proposed to allocate the site for 6,400sqm of B2 and Egiij uses.</p>

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	<p>accommodate car transporters. There are therefore no technical highways grounds to prevent or limit the use of this land as a concentrated location for a specialist employment hub of classic car related businesses and services.</p> <p>No Physical or Visual Intrusion - The incorporation of this land into the Designated Employment Area would form a natural completion of the existing pattern of employment development. Please see the attached extracts from the previous local plan showing how readily this additional land can be accommodated within the employment area without any visual or physical intrusion beyond its existing boundary lines</p> <p>Less than a 10% Increase - The current CS 9 Protected Employment Area is approx. 21.7 Ha, the proposed additional 2.68 Ha of employment land (including 0.75 Ha of Northway Porches' existing site) would comprise less than a 10% increase, within established natural boundaries on land already visually and physically contained and enclosed by the employment zone.</p> <p>Changes to policy SP 21 – to include the land on the attached Location Plan within the newly described Beenham Designated Employment Area.</p>	
Dijksman Planning LLP for Mr Charles Titchener (lpr2314)	<p>Correction needed to boundary of Beenham Designated Employment Area - I am objecting to policy SP 21 on the grounds that it does not include a 0.2 ha sliver of land within the Beenham Designated Employment Area (as defined under the previous policy SC9).</p> <p>Land Currently Used as Parking and Access– The current protected employment area utilises a small parcel of land containing parking and access, but it falls outside the designation. Correcting this requires no more than straightening the boundary line to reflect what is on the ground.</p> <p>Visually and Physically Enclosed - This parcel of land is visually and physically part of and used in association with, the industrial area. It contains parking and agricultural buildings, there will be no material effect on the landscape, the visual context is of the industrial area.</p> <p>Future Landscape Enhancement - The formal inclusion of this land offers future potential for boundary landscaping, of additional tree and hedge planting and screening, and therefore an overall improvement in landscape terms.</p> <p>Existing Establish Boundaries - The addition of the land would comprise no more than a recognition of its existing uses to an existing boundary line.</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>There is no planning permission for the hardstanding and change of use. Therefore, there has been no regularisation of the use, and no previous assessment undertaken by the Local Planning Authority as to the effect on the landscape. By placing the site into the Designated Employment Area this would not only allow the car parking, but employment related development, including buildings.</p>

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	<p>Less than a 1% Increase - The current CS 9 Protected Employment Area is approx. 21.7 Ha, the proposed additional 0.2 Ha of employment land would comprise less than a 1% increase, within established natural boundaries on land already mainly used for parking for the employment zone.</p> <p>To adjust the boundary of the Beenham Designated Employment Area to include the small area of land on the attached Google Map.</p>	<p>A Landscape Character Assessment (LCA) has been undertaken for the site. The LCA concludes that the site is unsuitable for development. The visual and landscape sensitivity is low to medium, and as the site is within the AONB the landscape value is medium to high. The landscape capacity is therefore low to medium. An extension to the DEA would result in a loss of open rural character and grass fields, typical of the AONB within this area. Introduction of more modern inclusions, such as large scale industrial buildings, noise and external lighting which would have an adverse effect on the AONB. Enclosing this stretch of the public right of way with industrial/business activities; and an adverse effect on the rural character of Clay Lane. Whilst there is potential to improve the NW edge of the existing PEA through a wide woodland landscape buffer this would likely take up much of the site, and not leave enough width for future development.</p> <p>It is not proposed to allocate this land or to extend the DEA boundary around the land.</p>
Peter Dowling (lpr2345)	<p><i>EMP1 Land east of Colthrop Industrial Estate, Thatcham</i></p> <p>We agree with and support the proposed allocation of the land as an extension to the Colthrop Industrial Estate. The long established Colthrop Industrial Estate provides a key focus for much of the District's industrial floorspace. The Council's ELR (2020) at paragraph 4.133 notes that Colthrop Industrial Estate is:</p> <p><i>"...the District's premier logistics and distribution park, home to some very large modern warehousing for Gist (M&amp;S), Harrods and Kuehne &amp; Nagel amongst others. The Estate also provides a range of smaller warehousing and light industrial units (eg Pipers Court) and the Thatcham Business park that provides office space. Some vacancy in the office stock, but very high occupancy in the industrial and warehousing stock. Land to the south of Gables Way, is the only undeveloped parcel, and this has planning permission for flexible B uses. Farmland to the east has been promoted</i></p>	<p>Comments are noted.</p> <p>The proposals map will reflect the site submitted and assessed as part of the HELAA (and planning application reference 21/02130/OUTMAJ).</p> <p>Each of the employment allocations will be the subject of individual site allocations policies, with Colthrop as Proposed Submission LPR Policy ESA1.</p> <p>Proposed Submission LPR Policy DM32 (Designated Employment Areas) outlines the approach to safeguarding and encouraging employment generating uses within</p>



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	<p><i>through the Call for Sites (MID5 a 5 ha site) as having potential to expand the estate.”</i></p> <p>The proposed extension to the industrial estate is clearly compatible with the surrounding development, bounded as it is by the extensive existing Colthrop Industrial Estate to both the west and south. Indeed, viewing the site from the east the development of the site would be seen within the context of the existing industrial estate.</p> <p>Immediately to the north is the Mercure Newbury West Grange Hotel – this is set back from the A4 Bath Road and the proposed extension would not be incompatible with this hotel use. The site is therefore ideally placed to form an extension to the existing industrial estate.</p> <p>The proposed extension directly reflects the ELR (2020) which recommends an extension to Colthrop Industrial Estate and specifically concludes (at paragraph 14, 6.64 and table 6.7) that the site (HELAA site MID5) is suitable land for allocation to form an extension to the industrial estate. Table 6.7 of the ELR (2020) also confirms that the site has “<i>No known constraints</i>”.</p> <p>It is also noted that the Thatcham Strategic Growth Study Stage 3 Report: Thatcham Future September 2020 at paragraph 1.34 also notes that the land “<i>...forms an opportunity for a logical and necessary extension of the Colthrop Industrial Estate.</i>”</p> <p>In summary, the site is suitable, immediately available for development, achievable and can be delivered within 5 years. The land is also in a single ownership. The site is capable of early delivery to meet demand and could accommodate flexible commercial (B2/B8 use) development on the site broadly consistent with the indicative scale of floorspace (20,400 sq m) proposed in Policy SP 21.</p> <p>The development of the site would comply with the proposed criterion within Policy SP21 and also Policy DC31 (Designated Employment Areas). The development would be compatible with surrounding uses without adverse impact on the highway network.</p> <p>It is noted in paragraph 1.22 of the Emerging Strategy consultation document that “<i>... There are still aspects of the LPR which need further work. For example, an updated Policies Map has yet to be produced...</i>”. In updating the Policies Map, the boundary for the Colthrop Industrial Estate DEA must include the proposed EMP1 extension – this extension should</p>	<p>Designated Employment Areas, and would not seek a sequential test for offices within such Areas.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>fully reflect the land associated with HELAA site MID5. Whilst the policy relates specifically to employment development, as explained at paragraph 7.1, given the recent changes to the Use Classes Order (combining office, commercial and service uses together within Class E) it is important that the Council allow for changes of use across these commercial uses where appropriate. The wording in Policy SP21 should therefore be reflective of this.</p>	
<p>Pro Vision for Greenham Trust Ltd (lpr2366)</p>	<p>This representation on the Local Plan Review (LPR) is made on behalf of Greenham Trust (the Trust), specifically in regard to its interests at Greenham Business Park (GBP) as the major land owner and manager of the park.</p> <p>As such, the Trust is a stakeholder in the local plan process and is keen to engage proactively with the Council and other stakeholders to assist with preparing a positive and deliverable local plan to meet development needs in sustainable way over the plan period.</p> <p>In summary, these representations state that:</p> <ul style="list-style-type: none"> <li>• The Trust supports the proposal to continue to recognise the importance of GBP to the economy by identifying it as a Designated Employment Area;</li> <li>• The LPR should expressly recognise that there is an adopted Local Development Order at GBP;</li> <li>• That GBP can continue to play an important role in meeting the identified need for office and industrial space over the plan period;</li> <li>• The employment evidence and LPR policies will need to be updated to factor in the emerging impacts of the COVID-19 pandemic;</li> <li>• It is important that the standards for development imposed through policy take, to tackle the causes of climate change for example, take into account feasibility and viability at the plan-making stage.</li> </ul> <p><b>The Proposed economic development strategy</b></p>	<p>Comments noted.</p> <p>It is recognised that there is a Local Development Order (LDO) at Greenham Business Park. Text will be added to the supporting text of the policy to recognise the current Local Development Order for Greenham Business Park. However, the LDO sets out a series of permitted development and development parameters which any planning applicant would need to consider. The policy would therefore not necessarily apply if development falls under the LDO.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>It is important that development proposals take into account climate change from the outset, including in costings. Technologies are likely to become more available and cheaper in the coming years. Tackling climate change through site and building design is one of the most important ways in reducing carbon output and</p>

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	<p>A key part of the evidence base for the LPR is the Employment Land Review (ELR)<sup>1</sup>.</p> <p>This confirms that there is demand for more office space and industrial space over the plan period.</p> <p>It is noted that the proposed strategic approach to economic development (draft Policy SP20) plans to meet the need identified in the ELR for offices and industrial uses.</p> <p>The ELR, however, makes it clear that these amounts are minimums, for office floorspace at least, which is not currently reflected in the draft policy. The ELR states that “The Council should scope the next generation of policies so that, if market demand for offices strengthens, it is clear that the 65,000 sq. m requirement is a minimum and policy is flexible and supportive for all forms of office development”.</p> <p>GBP is already a well-established part of the local economy and contributing to the supply of employment land.</p> <p>The ELR note that demand for space in GBP has increased as quality land or vacant space has been lost closer to Newbury. It also notes that GBP is fulfilling an important role in providing “good quality” office space<sup>4</sup>.</p> <p>The ELR therefore proposes designated GBP as a ‘Protected Employment Area’.</p> <p>This has translated in to the LPR in draft Policy SP 21 (Sites allocated for economic development), albeit with a differing terminology – Designated Employment Areas (DEAs).</p> <p>The Trust welcomes this continued recognition of the significance of GBP in the development plan through draft Policy SP 21.</p> <p>It is noted that specific development management matters for the DEAs are proposed in draft Policy DC 31. We would welcome clarification in draft Policy SP 21 that draft Policy DC 31 applies to the existing DEAs.</p>	<p>genuinely enabling each development to contribute to combating the effects of climate change.</p> <p>The LPR has been subject to whole plan viability in accordance with the NPPF. The whole plan viability assessment concluded that the delivery of economic development and employment floorspace would be viable taking into account other policy requirements within the plan, including climate change. The Whole Plan Viability Assessment can be found as part of the evidence base.</p> <p>Proposed Submission LPR Policy DM32 will apply to all DEA’s, existing and new.</p> <p>Proposed Submission LPR Policy DM35 (Sustaining a Prosperous Rural Economy) will apply to those sites outside of settlement and/or DEAs in the countryside, specifically to assist the rural economy.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Greenham Business Park Local Development Order</p> <p>While the Trust generally supports the proposed economic development strategy, it is disappointed that the LPR makes no reference to the adopted Local Development Order (LDO).</p> <p>Adopted in December 2018, the LDO is a positive planning tool that was prepared at significant effort by the Council, supported by the Trust and other stakeholders.</p> <p>It would be appropriate to recognise this simplified planning control regime in the LPR, which seeks to optimise the potential of the previously developed site and is therefore an important element of the economic strategy.</p> <p>Need for an update to the economic baseline</p> <p>It is acknowledged that the Employment Land Review<sup>5</sup> “was prepared prior to the outbreak of Covid-19, and so it has not been possible to capture the impact of the pandemic in this report”<sup>6</sup> and therefore reflects “a baseline prior to the economic consequences of the pandemic”<sup>7</sup>.</p> <p>It notes that the pandemic “will inevitably lead to change in Government planning policy to support economic recovery, and may well require an update of this work”<sup>8</sup>.</p> <p>The report does factor in “hard data on the impact of the 2016 Brexit vote” but not the impacts of the pandemic, which are “likely to be more significant”<sup>9</sup>.</p> <p>Further comments through the report make it clear that a further assessment will be necessary to inform the spatial strategy of the ELR.</p> <p>Summary and conclusion</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Greenham Trust is the major owner and manager of Greenham Business Park, one of the primary employment areas in the district.</p> <p>It is welcomed that the significance of the business park will continue to be recognised in the local plan by designation as a Designated Employment Area, and that the plan will continue to direct new employment development to these areas.</p> <p>The employment evidence base will need to be reviewed to factor-in the emerging impacts of the COVID-19 pandemic. Policies of the LPR, including draft Policy DC 31, should be reviewed in light of updated evidence.</p> <p>The LPR should recognise the adopted Local Development Order as an important part of the economic strategy, a positive planning tool to boost the local economy and optimising the potential of the business park.</p> <p>The LPR should be reviewed in respect of viability and other relevant evidence to underpin policy requirements so that development needs are delivered over the plan period while also addressing key issues including tackling the causes and impacts of climate change.</p>	
Pro Vision for Greenham Trust Ltd (lpr2378)	<p><i>*See attached for full representation*</i></p> <p>This representation on the Local Plan Review (LPR) is made on behalf of Greenham Trust (the Trust), specifically in regard to its land interests at Chieveley, adjacent to Junction 13 of the M4.</p> <p>Land in the Trust's ownership comprises two adjoining blocks of land immediately west of the A34, and a smaller block of land immediately east of the road, south of the motorway services area.</p> <p>In total, this equates to approximately 35 hectares.</p> <p>The land has been promoted through the 'Call for Sites' mixed-use employment, including logistics/distribution uses, and is identified in the draft HELAA as Site CH13.</p> <p>Greenham Trust also has interests at Greenham Business Park, and a separate representation is submitted in that regard.</p>	<p>Comments noted.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment use. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>The provision of industrial space within West Berkshire has been consistently strong over recent years, and both trend-based projections and economic forecasts indicate growth in industrial space. The ELR 2022 therefore recommends a minimum industrial requirement of 90,730sqm or 23 ha of</p>

Respondent (with lpr ref)	Response	Council Response
	<p>As such, the Trust is a stakeholder in the local plan process and is keen to engage proactively with the Council and other stakeholders to assist with preparing a positive and deliverable local plan to meet development needs in a sustainable way over the plan period.</p> <p>Representations about the available land were made in December 2018. The Trust continues to invite a meeting to explore the various potential of this strategically located land.</p> <p>In summary, these representations state that:</p> <ul style="list-style-type: none"> <li>• The updated evidence base identifies a need for more industrial land, including storage and distribution uses, to meet demand over the plan period;</li> <li>• There is demand for land in the M4 corridor in particular;</li> <li>• The evidence base acknowledges that it is a “pre-COVID-19” baseline, and the impacts of the pandemic will need to be factored in;</li> <li>• The proposed economic development strategy of the LPR is supported by an assessment of available sites, however, site CH13 has not been assessed;</li> </ul> <ul style="list-style-type: none"> <li>• The site is entirely within the AONB, therefore, exceptional circumstances would be required to support major development, but this possibility has not even been contemplated;</li> <li>• There are other constraints, including proximity to adjacent ancient woodland, but these could be managed through design so should not be seen as insurmountable at this stage;</li> <li>• Given the strategic location, on the interchange of the Strategic Road Network between east-west and north-south, the site should be considered through the evidence base as a potentially viable option for the economic development strategy, including in the changing demand context following the pandemic.</li> </ul> <p><b>Economic Evidence Base:</b> A key part of the evidence base for the LPR is the Employment Land Review (ELR)<sup>1</sup>. It recognises that Government guidance is to positively plan for growth<sup>2</sup>. The report identifies need for offices, estimating a need for at least 65,000 sq m of new floorspace over the plan period<sup>3</sup>.</p>	<p>land to 2039 to meet identified needs. To accommodate this need the Plan identifies a number of site allocations, as set out in Proposed Submission LPR Policy SP21, each of which has a site specific policy setting out development parameters.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessment (LCA) for a number of sites in the LPR, including CHI3. The LCA for this site does not recommend the site as being suitable for development. Development on the site would have an adverse impact on the surrounding landscape and AONB.</p> <p>The site currently has a strong relationship with the wider landscape to the south and east across the valley; forms part of the open agricultural valley landscape; forms part of and contributes to the open setting of the adjacent ancient woodland; and forms part of the adjacent Local Wildlife Site.</p> <p>Development on the site would result in loss to the open character; loss of ancient woodland including its open setting; erosion of the rural character of Green Lane and a number of PRoW in the area; and introduction of more modern inclusions including large scale buildings, noise and lighting eroding the traditional and rural landscape character of the area. Development on the site would be highly visible from the surrounding area.</p> <p>In turn this adversely affects the AONB, with loss of open land; loss of open setting of adjacent woodlands including ancient woodland; loss of amenity value of a number of PRoW; adverse impact on the rural character of Green Lane; eroding the rural quality by an increased level of</p>

Respondent (with lpr ref)	Response	Council Response
	<p>It goes on to report that “For industrial, demand for land is higher than for offices” and that there is a need to “frontload the plan with 16 hectares of easily deliverable sites”.</p> <p>Noting that the industrial market in West Berkshire is “performing well and vacancy is generally low”, the ELR goes on to report that “There is some demand for larger B8 distribution, but only for those locations in close proximity to the M4 motorway junctions”. (Our emphasis).</p> <p>“Generally”, it comments, “distribution occupiers would be most attracted to locations close to Reading” i.e. not exclusively, and there may be other suitable locations.</p> <p>The ELR proceeds to assess potential land to meet the (pre-COVID-19) outstanding demand for industrial floorspace.</p> <p>It is reported that a number of sites were promoted through the HELAA “that could potentially accommodate industrial uses” but that the Council has sieved out these sites to a shortlist of eleven for review<sup>4</sup>. All of these sites are noted to be either immediately adjoining existing industrial sites or very close to existing sites.</p> <p>The report also notes that “it is not for the ELR to determine whether AONB land will be needed. It will be for the Local Plan Review process to further consider and assess the suitability of such sites within constraints and supply of land in the District”<sup>5</sup>.</p> <p>Therefore, it is clear that the ELR has been strongly influenced by the Council’s initial sieving of sites, rather than, for example, considering all land available and promoted for commercial uses in terms of their potential to boost the economy, and then apply other policy considerations.</p> <p>An issue with that approach is that other policy constraints are dictating the proposed spatial strategy before appreciating where the best locations are for economic growth.</p> <p>Therefore some sites, including the land promoted by the Trust at Chieveley have not even been assessed for their potential to support and deliver economic objectives. The evidence base therefore, by design, has not tested the possibility of options that could significantly boost the economy and outweigh the conflict with other policy considerations.</p> <p>While it is acknowledged that economic benefits are in many cases unlikely to outweigh the disbenefits of development, it shuts the door to the</p>	<p>development, increased lighting and increased noise levels and traffic levels.</p> <p>It is not proposed to allocate the site, following the Council’s landscape evidence.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>possibility that some sites may have such benefits, perhaps of regional and/or national importance, that outweigh the harm.</p> <p>The Council’s approach is therefore potentially at odds with the Government guidance to proactively encourage sustainable economic growth, creating the conditions “in which businesses can invest, expand and adapt”<sup>6</sup>.</p> <p>National policy states that “significant weight” should be placed on supporting economic growth and productivity (NPPF 80) and that strategic sites can and should be identified for local and inward investment (NPPF 81).</p> <p>The NPPF also requires that local planning authorities plan for the locational requirements of different sectors of the economy, including for storage and distribution operations in suitably accessible locations (NPPF 82) (Our emphasis).</p> <p>National policy gives “great weight to conserving and enhancing landscape” in these designated areas (NPPF 172). Major development is not ruled out, however, if there are “exceptional circumstances” and the development is in the public interest.</p> <p>By sieving out some available sites, including CH13, before assessment against economic supply and demand (in the ELR), the Council is not even contemplating the possibility of, for example, exceptional circumstances.</p> <p>As shown in the draft HELAA, the headline constraint for CH13 is that it is entirely within the North Wessex Down AONB. This is a very key consideration and the Council has a duty to protect the designated landscape. However, it is not an absolute constraint, as the HELAA appears to presume.</p> <p>There are other issues, such as proximity of ancient woodland, and the possibility of some drainage issues on part of the (35 hectare) site. These are potential issues that can be resolved at design stage.</p> <p>The site is only excluded at stage 2b. There are no insurmountable, physical or other constraints otherwise it would have been automatically ruled out at stage 1 of the HELAA.</p> <p>In addition to the AONB constraint, the “settlement pattern” is cited as a reason to conclude that the site is “unsuitable” (presumably, therefore, the HELAA is saying for any economic or housing related development, no matter what the detail of the proposal).</p>	

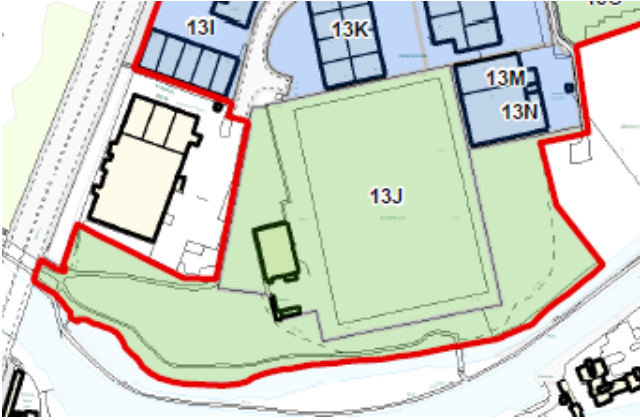


Respondent (with lpr ref)	Response	Council Response
	<p>We assume that this assessment is why the site has not been included in the ELR. Therefore, we note that there is a potential conflict with the NPPF, which allows the consideration of major development in designated landscapes (NPPF 172) and that local business needs may sometimes have to be accommodated beyond existing settlements (NPPF 84). In such cases, development need to have careful regard to the context and mitigating impacts, but national policy does not rule them out simply because they are remote from established settlements.</p> <p>In the case of CH13, the land is quite clearly remote from the nearest settlement (Chieveley, north of the motorway). That should also be seen in some respects as an advantage, as major industrial uses, such as distribution uses, are not appropriate adjacent to residential communities, or other sensitive neighbours.</p> <p>Furthermore, the locational advantage of the site is its proximity to the M4/A34 interchange, with service area, and reducing the need for commercial traffic to access through residential and other sensitive areas. There is interest in the land from national and international operators. It is the particular strategic locational benefits of the land in relation to the Strategic Road Network that is attracting the interest.</p> <p>Another part of the relevant evidence base is the Site Selection Background Paper (SSBP)7.</p> <p>In regard to economic development sites, this appears to summarise key conclusions from the ELR, including that “Demand is evident for larger B8 distribution in close proximity to the M4 motorway junctions particularly close to Reading8.”</p> <p>It also reports the need for 11 hectares of office land and 16 hectares for industrial floorspace, and therefore, “certain sites identified in the Housing and Economic Land Availability Assessment should be allocated/designated for employment uses”9.</p> <p>As noted above however, the assessment of available sites has omitted land at CH13 without even contemplating the potential for economic benefits (afforded significant weight in national policy) against impacts of development.</p> <p>The ELR should be updated to consider all available land for economic development that has not been automatically excluded through the HELAA</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>(stage 1). As noted in the ELR, the LPR should then consider the balance of issues, including for example, impact to the AONB against the economic (and other) benefits.</p> <p>It is noted that the proposed strategic approach to economic development (draft Policy SP20) plans to meet the need identified in the ELR for offices and industrial uses.</p> <p>The ELR, however, makes it clear that these amounts are minimums, for office floorspace at least, which is not currently reflected in the draft policy. The ELR states that “The Council should scope the next generation of policies so that, if market demand for offices strengthens, it is clear that the 65,000 sq m requirement is a minimum and policy is flexible and supportive for all forms of office development”<sup>10</sup>.</p> <p>Noting that the ELR identifies that “demand is also more pressing given the market shortage” for industrial land, and there is a need for front loading<sup>11</sup>, there is also a strong case for providing more choice in land to meet that demand. That would also help future proofing for needs beyond the plan period.</p> <p>Proposed sites are identified in draft Policy SP21.</p> <p>The merits of these sites should at least be tested against all available sites that are being promoted for these uses (other than those automatically excluded through the HELAA), to ensure the plan is delivering what the market needs in the locations it needs it for positive economic growth.</p> <p>A notable advantage of the CH13 is the proximity to not one, but two, of the regions strategic roads. It also has an advantage of scale, and therefore, possibility of future proofing. Yet the economic advantages of this location have not even been considered in the current evidence base.</p> <p><b>Need for an update to the economic baseline</b></p> <p>The ELR is already six months old since issue (and more since the assessment was undertaken), a period that has seen on-going impacts to the national, regional and local economy through the COVID-19 pandemic. It is acknowledged that the evidence “was prepared prior to the outbreak of Covid-19, and so it has not been possible to capture the impact of the pandemic in this report”<sup>12</sup> and therefore reflects “a baseline prior to the economic consequences of the pandemic”<sup>13</sup>.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>It notes that the pandemic “will inevitably lead to change in Government planning policy to support economic recovery, and may well require an update of this work”<sup>14</sup>.</p> <p>The report does factor in “hard data on the impact of the 2016 Brexit vote” but not the impacts of the pandemic, which are “likely to be more significant”<sup>15</sup>.</p> <p>Further comments through the report make it clear that a further assessment will be necessary to inform the spatial strategy of the ELR.</p> <p>We agree with this conclusion. The impact on work patterns and retail, with significant shift to online sales, is likely to have a very significant impact on future demand for land. Strategic locations near to the strategic road network, and other transport connections, are very likely to be in even greater demand.</p> <p>Hence, the strategic development opportunity promoted by the Trust should be properly contemplated and assessed in this context.</p> <p><b>Summary and conclusion</b></p> <p>The Trust is promoting land in its ownership adjacent to Junction 13 of the M4 for economic development.</p> <p>This location has particular strategic advantages, being at the interchange of the two main strategic roads in the region, the M4 and A34, providing access in all directions without relying on local roads.</p> <p>Demand for employment land has been updated for the LPR. There is demand for more office floorspace. There is greater demand for more industrial space over the plan period, especially close to the motorway junctions, particularly towards Reading but not necessarily exclusively. However, that assessment has not considered all available sites being promoted, including CH13.</p> <p>Therefore, the evidence base has failed to assess whether the benefits of development in this location, to be given significant weight, could balance or outweigh the impact of development, notably on the AONB.</p> <p>While the HELAA has concluded that the site is “unsuitable” for development, it has not identified insurmountable constraints.</p> <p>There is market interest from national operators, given the significant strategic locational advantages of the land adjacent to Junction 13.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The land is being promoted for uses that are not appropriate in residential areas.</p> <p>The economic baseline needs to be updated to factor in the emerging impacts of the COVID- 19 pandemic.</p> <p>As drafted, the Trust does not support the LPR as sound given these gaps in the evidence base which are being used to underpin the proposed economic development strategy.</p>	
Turley Associates for Panattoni (lpr2379)	<p><i>Full representations by Turley on behalf of Panattoni are attached with extracts below.</i></p> <p>Panattoni support Policy SP21 as it seeks to allocate land to the north of the A4, Theale for employment development.</p> <p>However, and as noted in section 2 (<i>of full representation</i>), Panattoni wish to ensure that adequate flexibility is built in to the policy wording to allow the delivery of the site to accommodate future market changes and prospective tenant requirements.</p> <p>The existing evidence base is premised on the delivery of office development on the site. It is essential that the allocation and the associated evidence base allows sufficient flexibility to accommodate changes in market and consumer demand over the life time of the Development Plan to ensure that this objective is met.</p> <p>We would ask that this position is reflected in the next iteration of the Plan and its policies.</p> <p>Panattoni would welcome the opportunity to engage in constructive discussions with the planning authority to ensure the emerging policy reflects the aspirations and market requirements for the site, thereby ensuring its speedy delivery.</p> <p>We would ask that this position (<i>that the allocation and the associated evidence base allows sufficient flexibility to accommodate changes in market and consumer demand over the life time of the Development Plan</i>) is reflected in the next iteration of the Plan and its policies.</p>	<p>Comments noted.</p> <p>The ELR (2020) recognises Theale as one of the locations in the District providing office stock (out of town). Theale is more in demand from occupiers than in other areas of the District, due to its proximity to Reading (paragraph 4.42). Recent demand has been from corporate occupiers/SMEs, with a higher demand than in other areas of the District. At 4.66 the ELR comments that office occupiers prefer to be closer to the town centre or a motorway junction, though due to lack of available space and land they are prepared to take space in outer locations, such as Greenham Business Park.</p> <p>The ELR also recognises the attractiveness of locations, such as Theale for industrial development. This is due to the proximity to the Reading market.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken. The work recognises the contribution the site makes to the separation of Theale and Calcot, and to the setting of the Theale and the Conservation Area. The introduction of offices and/or other large-scale buildings would be out of scale and keeping with the historic village character of Theale. It would also be visible from the North Wessex Downs AONB. Therefore, the landscaping work (LCA)</p>

Respondent (with lpr ref)	Response	Council Response
		<p>recommends that the site is not developed for employment purposes. As part of the LPR going forward it is no longer proposed to allocate the site.</p>
<p>West Berkshire Council as landowner of London Road Industrial Estate (LRIE) (LATE SUBMISSION)</p>	<p><b>Propose the renaming of the LRIE DEA.</b> There is the potential for confusion between the existing London Road Industrial Estate DEA which includes the adjoining Riverpark Industrial Estate, and the area within the Council's freehold ownership for which the Council as landowner has aspirations – also known as the London Road Industrial Estate (expected to be renamed in early 2023). This should be addressed either by renaming the DEA or by providing clarification within the supporting text.</p> <p><b>Propose</b> extension of London Road Industrial Estate Designated Employment Area to cover land to the south currently comprising a playing field, a car park and open space (see area shaded in green below and in attached plan).</p> <p>This is in line with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <a href="https://info.westberks.gov.uk/lrie">https://info.westberks.gov.uk/lrie</a></p> 	<p>(LATE SUBMISSION) Comments noted.</p> <p>There is a subtle difference between the names as the DEA is titled 'London Road Industrial Estates', which includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate. Given the Council expect the name of the Council owned land to change in early 2023, it is not proposed to amend the name of the DEA in the LPR. Proposed Submission LPR Policy SP20 will address this matter within the supporting text, along with the current status of the LRIE.</p> <p>As part of the evidence base which informs the Local Plan Review the Council has undertaken a review of the District's Protected Employment Areas, to be renamed Designated Employment Areas (DEAs) through the LPR process. As part of this work, the Faraday Road football ground and surrounding land, submitted within this representation, has been considered.</p> <p>The Council has reviewed the designated areas, taking the Employment Land Review (ELR) as the starting point in considering how each area performs including any key issues or opportunities, and any changes in circumstances, in particular where there has been a loss of office space to residential through permitted development rights, or new development adjacent to existing areas. This work also takes in account allocations set out within the LPR and the designation of new DEA as identified in Proposed Submission LPR Policy SP21.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Propose additional paragraphs in the supporting text to align with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <a href="https://info.westberks.gov.uk/lrie">https://info.westberks.gov.uk/lrie</a>:</p> <p><i>7.15 The London Road Industrial Estate has scope for <del>comprehensive regeneration</del> intensification of employment use within the plan period to maximise the potential of the site. Some mixed use development may be appropriate in the context, such that no net loss of employment floorspace results from that development.</i></p> <p><i>7.16 The Council-owned London Road Industrial Estate (LRIE) currently has an estimated 23,000 sqm of employment space (Avison Young Development Brief 2020) occupied by 36 businesses that employ about 300 people. <u>Following a review taking into account evolving economic drivers, market demand and the district's ambition to be carbon neutral by 2030, a revised Delivery Strategy for LRIE approved by Executive on 9/6/22 aims to increase employment floorspace on the site by at least 30%, safeguard 300 jobs and create at least 200 new jobs by 2030.</u></i></p> <p><i>7.17 The Council as freeholder will work with leaseholders to deliver environmental enhancements on the site including on carbon net zero, nutrient neutrality, sustainable drainage and biodiversity net gain. Further details to be set out in an LRIE Place-making Strategy which will be submitted as a Supplementary Planning Document in due course and progressed through the statutory planning process in parallel with the Local Plan Review.</i></p> <p><i>7.18 The Council as landowner is promoting alternative provision outside the LRIE to mitigate the loss of the playing field. This approach is supported by Sport England and aligns with the Council's Playing Pitch Strategy. The exact location of the alternative provision will be determined at the point at which a planning application for redevelopment of the playing field is</i></p>	<p>It is not proposed to include this area of land within the DEA. The conclusions of the DEA review work will be published alongside the Regulation 19 consultation.</p> <p>The supporting text of Emerging Draft LPR Policy SP20 will be amended to ensure the Proposed Submission Draft LPR clearly sets out the Council's approach to the London Road Industrial Estate as Local Planning Authority.</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	<u>submitted, accepting that it is for the statutory planning process to determine whether or not redevelopment of the former football ground should be permitted.</u>	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: SP22 Transport****(Proposed Submission LPR Policy: SP23 Transport)**

Number of responses received: 27

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr144)	Supports the policy	Comment noted
Newbury Town Council (lpr2253)	We support this policy.	Comment noted
Shaw-cum-Donnington Parish Council (lpr2016)	<p>In bullet 2 what is “active travel”? Is it cycling and/or walking?</p> <p>In bullet 3 how do you define “sustainable travel”? Is it self financing travel or is it a service with a guaranteed frequency and cost?</p> <p>We would like to have seen plans for new strategic roads to alleviate the congestion within Newbury and in particular the Robin Hood roundabout. For example a road joining the junction of the A34 and A339 to Thatcham to reduce traffic on the Robin Hood roundabout and A4. A road from the Swan Roundabout to the Andover Road to take traffic to and from Basingstoke to the A34 rather than going through the town. A road from the A4/A34 junction</p>	<p>Comments noted.</p> <p>Yes, active travel typically relates to travel that requires physical effort, walking, cycling or wheeling (e.g. use of scooters or wheelchairs). It can also include horse riding which is a mode of travel relevant to particular areas of West Berkshire.</p> <p>In this instance, this relates to sustainable travel that minimises the negative social, environmental and climate impacts of travel.</p>



Respondent (with lpr ref)	Response	Council Response
	to the Embourne Road again to reduce traffic on the Robin Hood roundabout.	There are no supporting studies to enable the types of new key routes mentioned to be identified as planned infrastructure in the Local Plan. Any such routes would need to link with significant levels of development for delivery and these are not proposed. The proposed growth outlined in the draft Local Plan will seek to manage demand for travel through making best use of the existing highway network, with capacity enhancements largely confined within the existing network, combined with measures to develop and encourage sustainable and active travel choices. Where (if) the need for more major and strategic links is identified, appropriate studies and business cases would need to be prepared.
Stratfield Mortimer Parish Council (lpr407)	This section should be completely re-written in a much more logical form with clear guidance that applies to different types and sizes of development and which does not allow mitigation when the clear aim is to have no adverse effect.	Comments noted.  The more detailed approach that is being sought from these comments might be answered through the Development Management policies relating to transport. This policy is the strategic policy and does therefore not get into the details but sets the overall principles.
Thatcham Town Council (lpr1406)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>We welcome the reference to the Climate Emergency and minimising the impact on the environment. To this end we encourage improved access to the station that improves take-up of rail service. However, this must not be approached from an active-travel solution only because active-travel is not a solution that is suitable for many people, or always possible during inclement weather. Therefore, a more strategic approach to encouraging update of rail and access to the station must be considered that includes car access and increased parking, bus stations/shelters, and disabled access.</p>	Comments noted.  Improving access to and improving facilities at Thatcham railway station is likely to be a key project. It is recognised that as well as improving active travel to the station, access by bus and improvements car parking are also considered. Any package of enhancements would also need to make the station more accessible for all who wish to travel. The Council has a good record of working with the rail industry (especially GWR) and local communities to develop and deliver such projects, such as those currently being delivered at Newbury and Theale stations.

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• "For residential development, a full Transport Assessment will be required where 60 or more dwellings are proposed."</li> <li>• "follow the advice set out in the Council's 'Highway Design Guidance for Residential Developments.'"</li> </ul> <p>The period of the Local Plan covers 17 years. It is impossible to predict what the traffic profile will look like in 2037 as this will be speculative, but there is more certainty in traffic profiles in shorter time periods as they will be similar to known patterns.</p> <p>The reference to Highway Design Guidance should mean it forms part of the evidence base and be available for public scrutiny. It is not included and therefore we are unclear to what guidance is being referred, when this document was produced, and whether it is relevant for predicting traffic assessments to 2037. With the absence of supporting information, we make the following points about traffic planning:</p> <p>Road Traffic Forecasts by the Department of Transport (RTF18) forecast traffic growth from 2018 in all scenarios ranging from 17% to 51% in the period to 2050, and approximately 10% to 31% in the period to 2037 (RTF18, figure 25). The upper bounds (51% and 31%) are related to scenarios that assume a faster take up of zero emission vehicles and there is no suggestion that technology will reduce demand.</p> <p>The additional demand from traffic generated by 2,500 properties in the period to 2037 must be taken in the context of a background of increasing growth nationally. This is an essential starting point aligned with national guidance.</p> <p>It is essential that traffic assessment start from known, evidence based, traffic densities based on measurements. Traffic assessments must consider the impact over a series of time periods such as [0,5,10,17] years in which [0] represents the base line from existing known traffic flows (using a baseline of 2019 before Covid created extraordinary reduction in traffic use). The Annex contains substantial material from residents regarding existing traffic congestion at locations relevant to SP 17 that should form part of that evidence base and base line.</p>	<p>The "Highway Design Guidance for Residential Developments" referred to will form part of the evidence base. It is currently in draft form and will be shared as part of the evidence base as soon as possible. It will be up to date and is a document that can be reviewed and updated as necessary (with consultation) to reflect any significant changes during the plan period.</p> <p>Background traffic growth has been included in the 2037 forecast transport modelling scenarios used for the Council's Transport Assessment.</p> <p>Both the West Berkshire Strategic Transport Model and the local Thatcham VISSIM model used in the Transport Assessment process were developed prior to Covid. Both included a comprehensive data collection exercise (2017 &amp; 2018 respectively) and were subject to calibration and validation in accordance with DfT WebTag requirements.</p> <p>The proposed quantum of proposed Local Plan growth (including the NET site) is considered, as well as overall background traffic growth, in our future years transport modelling scenarios.</p> <p>The proposed highways and other transport/travel mitigation packages for the NET site will be identified as part of the LPR Transport Assessment to be submitted for the Local Plan examination.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Traffic assessments that predict greater periods into the future, e.g. 2037, must consider a range of scenarios as forecasting a period of 16 years into the future is uncertain. The default scenario is the 'national vision' or 'scenario 1 reference' from the Department of Transport (2018). The impact of extra demand from 2,500 properties must then be considered in addition to the underlying growth rate.</p> <p>It is essential that the Highways Design Guidance are published as part of the evidence base, and that any assumptions made on Traffic Assessment regards future growth are clearly stated. If there are deviations from national guidance and default scenarios this must be explained with justification in the Traffic Assessment. Any assumptions within the Traffic Assessment must be elevated to policy (SP 17) if it is a necessary and legal condition of development.</p> <ul style="list-style-type: none"> <li>• "Mitigate any impact on local transport networks and the strategic road network".</li> </ul> <p>We recognise the statement that "development (at Thatcham NE) would have a very significant impact on the local highway network" and the mitigation measures need to be explained.</p> <p>Mitigation policies must not lead to adverse and harmful impacts on health and well-being, including air quality degradation or noise pollution, which would conflict with policy DC 4. We note from responses from residents (Annex) that properties have been built close to the roads of Floral Way and Bowling Green Road and there is no set-back, or shielding, for noise prevention. A mitigation approach that directs an increase of traffic onto these roads which lead to noise pollution would be contrary to DC 4.</p> <p>It is essential that mitigation methods are defined in the Traffic Assessment, elevated to policy SP 17 and maintain consistency with DC 4.</p>	
Reading Borough Council (lpr1492)	The emerging draft plan lacks any reference to the transport schemes that will be supported or required in accommodating the level of growth proposed. The Infrastructure Delivery Schedule is to be added later, and the strategic transport policies are more general in nature and do not reference specific proposals. Reading's draft Local Transport Strategy and adopted Local Plan both refer to two park and ride corridors, linked to fast track public	Comments noted.  No PnR sites on the A4 and A329 corridors have been identified in West Berkshire. The Council in partnership with GWR, is currently in the process of delivering a series of upgrades at Theale station, which will allow it to become

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	transport, to the west of Reading extending into West Berkshire, including a fast track public transport link between the two sites, as well as orbital fast track public transport links to the existing Mere oak Park and Ride within Wokingham Borough. We would expect to see these measures reflected and supported within the next version of the Local Plan, and would welcome further discussion on potential sites and routes.	a Park & Rail service on the western side of Reading (which Reading BC have previously supported). We would welcome dialogue with Reading BC regarding its proposals for P&R sites and Fast Track public transport routes and how these can be accommodated in the West Berkshire area. We are also about to embark on a review of our Local Transport Plan. This will consider cross-boundary movements and we will ensure that both Wokingham and Reading are consulted on the development of our new long-term LTP transport strategy.
South Oxfordshire District Council (lpr1783)	We support the inclusion in Policy SP22 (Transport) of a requirement for development proposals of 60+ dwellings to be accompanied by a full Transport Assessment. We also support the need to mitigate the impact of planned growth on local transport networks and the strategic road network, particularly any impacts on the capacity and traffic flow of the A34.	Comments noted.  We share the concern regarding growth along the A34 corridor, in particular to section north of the M4, both in WBC and Oxfordshire. There is a need to work with National Highways to seek improvements to this section as it has a poor safety record.
Vale of White Horse and South Oxfordshire District Councils (lpr1778)	Given the overall scale of residential development proposed across West Berkshire, we support the inclusion in Policy SP22 (Transport) of a requirement for development proposals of 60+ dwellings to be accompanied by a full Transport Assessment. We also support the need to mitigate the impact of planned growth on local transport networks and the strategic road network, particularly any adverse impacts on the capacity and traffic flow of the A34.	Comments noted.  We share the concern regarding growth along the A34 corridor, in particular to section north of the M4, both in WBC and Oxfordshire. There is a need to work with National Highways to seek improvements to this section as it has a poor safety record.
Highways England (lpr1333)	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals	Comments noted.  Engagement has commenced with National Highways, with further meetings expected to be held as we move through the process. The impact of the Local Plan proposals on the Strategic Highway Network, particularly in relation to the M4 junctions at 12 & 13 and on the A34 in

Respondent (with lpr ref)	Response	Council Response
	<p>that have the potential to impact the safe and efficient operation of the SRN, in this case the A34 and M4.</p> <p>We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in West Berkshire without careful consideration of mitigation measures. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. Highways England in general, will support a local authority proposal that considers sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.</p> <p>We have reviewed the information provided.</p> <p>We note that the focus for significant growth in the Local Plan will be in Newbury and Thatcham alongside proposals close to the M4 and A34 in the Eastern Area. As the Local Plan is developed, we would expect to see an assessment of the potential impacts from these sites on the SRN. Although smaller sites individually may not have a significant impact on the SRN, collectively there could be a significant impact without a targeted package of mitigation measures. This will likely be informed as further work is done to develop the Local Plan's (and specific site policies) supporting evidence base.</p> <p>It is vital that as West Berkshire's Local Plan is developed, the deliverability of any required infrastructure that proposed growth is reliant upon is fully assessed. Prior to submission of the Local Plan, it would need to be demonstrated that there was a reasonable prospect of delivery of the required infrastructure to enable planned growth, to ensure the document is sound. Growth proposals such as those at Newbury and Thatcham should be considered within the context of the cumulative impact of development.</p> <p><u>Local Plan Review Transport Assessment Report</u></p> <p>Highways England strongly supports West Berkshire's commitment to work with partners to address infrastructure constraints to ensure new development can be accommodated. We look forward to continuing the ongoing work with all parties which include West Berkshire Council, Wokingham Borough Council, Reading Borough Council and Hampshire County Council to identify and produce a robust transport strategy which</p>	<p>the Newbury area will be fully assessed and provided to National Highways.</p> <p>We will continue to engage with Highways England over the course of the Local Plan Review process as the Transport Assessment evolves.</p> <p>The overall Local Plan Growth is included in the future year scenarios, which comprises both the main strategic sites and the cumulative growth of the proposed smaller sites. Masterplanning work for the main strategic sites will include identifying the appropriate highway and sustainable / active travel mitigation packages that will be required to accommodate the planned growth.</p> <p>We have a good working relationship with our neighbouring transport authorities. In particular, we have been involved in many cross-boundary projects with Wokingham BC, Reading BC and Hampshire CC. We are also active members of the Berkshire Strategic Transport Forum (which includes Wokingham, Reading and Highways England). We are also about to embark on a review of our Local Transport Plan, which will include a need to work with our adjoining partner authorities.</p> <p>The impact of Local Plan growth on the SRN will continue to be taken into account during the remainder of the Local Plan Review process.</p> <p>The additional capacity arising from the Smart Motorway scheme has been included in the future year scenarios for the transport modelling.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>would inform the size and scale of development deliverable within the West Berkshire area. This will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the growth is planned.</p> <p>We have not previously reviewed the current Transport Assessment supporting the emerging Local Plan, but we note that many of the M4 and A34 junctions within West Berkshire are predicted to be over capacity with predicted growth. We look forward to working with West Berkshire to undertake further transport modelling to support the Regulation 19 Local Plan submission. This will be essential to identify an appropriate package of mitigation measures to support the delivery of growth whilst maintaining a continued safe and efficient SRN. The results of an agreed Transport Assessment Report will be used to inform updates to the forthcoming Infrastructure Delivery Plan (IDP) to support a sound Local Plan. To support a sound Local Plan, the IDP will need to set out what infrastructure is critical for development to be deliverable in transport terms, this will include the proposed funding mechanisms together with who is funding and when it is required.</p> <p>We're currently improving the M4 between junction 3 at Hayes and junction 12 at Theale by upgrading it to a smart motorway. This means there will be an additional lane for traffic which will increase capacity and reduce congestion, more technology on the road to smooth traffic flows and manage incidents and more reliable journey times. Further information and updates can be found here: <a href="https://highwaysengland.co.uk/our-work/south-east/m4-junctions-3-12-smart-motorway/">https://highwaysengland.co.uk/our-work/south-east/m4-junctions-3-12-smart-motorway/</a></p> <p>For background, you may be interested to read "The Strategic Road Network Planning for the Future" which is a guide to working with Highways England on planning matters. Please see: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf</a></p>	

Respondent (with lpr ref)	Response	Council Response
	<p>We look forward to continuing engagement with the council and other stakeholders to identify how planned growth in West Berkshire can be delivered through the spatial planning process.</p> <p>As the Local Plan is developed, we would expect to see an assessment of the potential impacts from these sites (close to the M4 at Newbury and Thatcham and the A34 in the Eastern Area) on the SRN. Although smaller sites individually may not have a significant impact on the SRN, collectively there could be a significant impact without a targeted package of mitigation measures. More evidence of impact is needed.</p>	
<b>General consultation bodies</b>		
AWE (lpr520)	<p>In the fifth bullet point, the word 'any' should be deleted and replaced with the word 'adverse'. This is because development should not be required to mitigate any impact as the existing transport network may well have capacity to accommodate the impact or be able to accommodate the impact in a safe manner. However, it is correct that adverse impact should be mitigated.</p> <p>Note 3 of the policy advises that indicative thresholds are set out in the Council's guidance note on Transport Assessment. It is understood that no such guidance note currently exists and so it is not possible to advise if they are considered correct. However, providing AWE are consulted on the guidance note when it is produced then this is considered acceptable.</p>	<p>Comments noted.</p> <p>Amend 5<sup>th</sup> bullet point of the policy as follows – 'Mitigate any <u>adverse</u> impact on local transport networks and the strategic road network'</p> <p>Further clarification regarding guidance on Transport Assessment will be provided in the Regulation 19 submission.</p>
British Horse Society	<p>We believe that the Active Travel Plan is a separate document to the Local Transport Plan. We feel emphasis of its existence is beneficial.</p> <p><a href="http://decisionmaking.westberks.gov.uk/documents/s31482/Appendix%20A%20Active%20Travel%20Strategy.pdf">http://decisionmaking.westberks.gov.uk/documents/s31482/Appendix%20A%20Active%20Travel%20Strategy.pdf</a></p> <p>The Society applauds &amp; welcomes the recognition of equestrians in this paragraph. This is consistent with the current West Berkshire Local Transport Plan and the Active Travel Plan and other sections of the LPR.</p>	<p>Comments noted.</p> <p>Yes, the Active Travel Strategy is a supporting document of the current Local Transport Plan. We are about to embark on a review of our Local Transport Plan and its supporting strategies (including the Active Travel Strategy).</p>

Respondent (with lpr ref)	Response	Council Response
Heritage Forum (lpr83)	<p>In bullet 2, what is “active travel”? Is it cycling and/or walking?</p> <p>In bullet 3, how do you define “sustainable travel”? Is it self-financing travel, or is it a service with a guaranteed frequency and cost?</p> <p>We would like to see plans for new strategic roads to alleviate the congestion within Newbury, and in particular the Robin Hood roundabout. Examples might be a road joining the junction of the A34 and A339 to Thatcham to reduce traffic on the Robin Hood roundabout and A4, a road from the Swan Roundabout to the Andover Road to take traffic to and from Basingstoke to the A34 rather than going through the town, and a road from the A4/A34 junction to the Emborne Road again to reduce traffic on the Robin Hood roundabout.</p> <p>The limited transport options available to anyone living west of Newbury along the A4 corridor, and for the rural villages north of the A4, should be particularly addressed.</p> <p>7.18 The present limited bus service along Andover Road – every two hours within limited times on weekdays – suggests that much still needs to be done to create a bus service which is a viable alternative.</p>	<p>Comments noted.</p> <p>Yes, active travel typically relates to travel that requires physical effort, walking, cycling or wheeling (e.g. use of scooters or wheelchairs). It can also include horse riding which is a mode of travel relevant to particular areas of West Berkshire.</p> <p>In this instance, this relates to sustainable travel that minimises the negative social, environmental and climate impacts of travel.</p> <p>It is highly unlikely that the Local Plan will identify the need for new strategic roads, which if built would be tied into significant development. The proposed growth outlined in the draft Local Plan will seek to manage demand for travel through making best use of the existing highway network, with capacity enhancements within the existing network, combined with measures to develop and encourage sustainable and active travel choices.</p> <p>We are about to embark on a review of our Local Transport Plan (and supporting documents). In this instance, rail stations at Hungerford and Kintbury provide direct competition for the A4 corridor, making it difficult for financially sustainable bus services. However, it is recognised that many rural parts of the district have no, or a very minimal bus service. The Council has recently published a Bus Service Improvement Plan, which outlines that Demand Responsive Transport options are being investigated for rural areas where there are no bus services (e.g. between Hungerford and Lambourn).</p>



Respondent (with lpr ref)	Response	Council Response
		As part of the proposed Sandford development, there will be improved bus services between the development area and Newbury town centre.
Mid and West Berkshire Local Access Forum (lpr1865)	<p>MWBLAF welcomes the recognition in this policy of the ever-increasing importance of active travel.</p> <p>It appears that the Active Travel Strategy is a separate document to the Local Transport Plan, and not an integral part of it:  <a href="http://decisionmaking.westberks.gov.uk/documents/s31482/Appendix%20A%20Active%20Travel%20Strategy.pdf">http://decisionmaking.westberks.gov.uk/documents/s31482/Appendix%20A%20Active%20Travel%20Strategy.pdf</a></p> <p>It should therefore be referenced separately in the supporting text, with an explanatory paragraph.</p> <p>The Forum recommends adding a reference to paragraph 7.17 of the supporting text: 'Improving and promoting opportunities for active travel should be considered for all development and be carried out in a way that recognises safety as a key consideration. Particular focus should be given to the safety of pedestrians, cyclists, equestrians, and other vulnerable road users. These active travel modes benefit people's health and are promoted through the Local Transport Plan, the Active Travel Strategy and the Environment Strategy.'</p> <p>We recommend adding the following paragraph: Housing and industrial development inevitably brings increased motor traffic to local roads including those minor roads favoured by non-motorised users. As traffic levels increase, use of roads by non-motorised users decreases. Provision for all non-motorised users needs to be made to encourage healthy lifestyles:</p>	<p>Comments noted.</p> <p>The Active Travel Strategy is a supporting document of the current Local Transport Plan (LTP). The main role of the strategy is to outline in more detail how the Active Travel related policies of the LTP will be delivered.</p> <p>We are about to embark on a review of our Local Transport Plan, which will be followed by a review of the LTP's supporting documents, including the Active Travel Strategy.</p> <p>Amend the supporting text as follows –          '...These active travel modes benefit people's health and are promoted through the Local Transport Plan <u>and supporting Active Travel Strategy</u>, and the Environment Strategy.'</p> <p>This is covered in more detail by Emerging Draft LPR Policy DC35 – Transport Infrastructure</p>
West Berkshire Green Exchange (lpr1557)	We have grave concerns over the impact on transport of building 2,500 homes in Thatcham which is not well-connected by road. We would want to see an analysis of people's expected lifestyles including where they can be expected to work and what their travel requirements will be. The links to the motorway system from this site are poor. The access to Thatcham Station, over one mile away, by car is also poor.	<p>Comments noted.</p> <p>The NE Thatcham site will be informed by a detailed transport assessment that will outline the potential travel patterns, including destinations and mode of travel. The assessment will include a detailed highway assessment undertaken in accordance with Department for Transport</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The two routes north are unclassified roads through villages such as Cold Ash, Hermitage and Bucklebury, the only southern routes are also unclassified and go via the level crossing or Brimpton village, and the route west is via the A4 into Newbury. Even with the current Thatcham population, these routes involve queuing at peak times. Such a development will cause pressure for further road building which would be an environmental disaster. We urge WBC to conduct and publish a full traffic modelling analysis to inform the development of this plan.</p> <p>When considering the building of new properties the requirement for off-road charging needs to be considered more rigorously. It should be assumed that every adult in a house may require a car and that each car will need off-road charging. Therefore sufficient parking should be provided as a matter of course. We see all too often housing developments plagued with poor roadside parking as the needs of the occupants is not considered by the developers. Equally the power infrastructure in properties needs to be better catered for and three phase supplies that can meet the needs of 3-4 cars charging off-peak should be considered. Electric vehicles will soon be able to supply power to the grid/house as well as take it, and this should also be considered. Other power demands are also likely such as batteries and air source heat pumps.</p> <p>Consideration should also be given to the development of rapid charging hubs like the one currently installed by Grid Serve at Braintree. Suitable locations for these should also be identified to cater for those travelling through the area and for those with limited off street parking. Such locations should be in all the towns and in the larger villages.</p> <p>Hydrogen may become a future fuel for commercial vehicles and locations should also be identified for these developments.</p> <p>Dundee City and Milton Keynes are spearheading the adoption of EVs and some of the solutions they have developed should be considered eg free and dedicated parking for EVs.</p>	<p>WebTag guidance, which will identify the impact of the NE Thatcham site on the local highway network, including routes through Cold Ash. The transport assessment process will identify an appropriate highway mitigation package to minimise the impact of the site on the local highway network in Thatcham and surrounding areas. The assessment will similarly identify a package of non-highway mitigation measures to manage the demand for car travel by providing greater choices and opportunities for active and public transport measures. This will include high levels of pedestrian and cycle connectivity, good / frequent bus services serving the site and improvements of access to and passenger facilities at Thatcham railway station. The Transport Assessment work carried out to inform the Local Plan Review will be included as part of the evidence base for the Regulation 19 submission for the Local Plan examination.</p> <p>The provision of electric vehicle charging points and infrastructure is currently actively sought in the development management process and will remain the case into the new Local Plan. The Council is also currently developing its own guidance to outline the requirements that developers will be expected to provide. The UK Government has recently announced that new homes and buildings, including those undergoing renovations, are now required to install electric vehicle charging points as part of English Building Regulations. Policy DC35 looks for opportunities to develop a comprehensive public charging network in West Berkshire.</p> <p>Alternative fuels, such as Hydrogen, may well develop during the course of the plan. The imminent review of the Council's Local Transport Plan will cover the role of alternative fuel systems.</p>

Respondent (with lpr ref)	Response	Council Response
West Berkshire Green Party (lpr1844)	We propose the following amendment: replace sentence beginning “Have regard to West Berkshire’s declared Climate Emergency ...” with: “Minimise the impact of all forms of travel on the environment, in accordance with West Berkshire’s declared Climate Emergency and Environment Strategy.”	Comments noted.  Amend the 1 <sup>st</sup> bullet point of the policy as follows – <u>‘Minimise the impact of all forms of travel on the environment, in accordance with West Berkshire’s declared Climate Emergency and Environment Strategy. minimise the impact of all forms of travel on the environment.’</u>
<b>Other stakeholders</b>		
Sam Coppinger (lpr301)	In respect to Ermin Street and Ramsbury Road, traffic along these roads is already extremely heavy and impacting all surrounding villages. Further development here would further damage the quality of life for local residents - these roads are extremely dangerous.	Comments noted.  Other than the consented logistics site adjacent to the designated employment area at Membury Industrial Estate, there are no major development proposals in this part of the district. In addition, should any development applications come forward, these would be considered on a case by case basis through the Development Management process.
Colin Duff (lpr453)	Any major proposed development such as Sandford and NE Thatcham must form part of a greater strategic transport plan for the district and their transport plans must not be permitted to dwell on immediate interfaces with existing transport. Public transport must reflect the expanding population. Provisions toward active travel must be holistic and provide all requirements.  Changes: Transport to and from Thatcham is predominantly on an east-west axis and to travel north and south, except going down narrow country roads and through villages, involves the already heavily trafficked A4 to Newbury for access to the A34 , A339 and M4 and to Theale for the M4. The proposed Thatcham NE development will vastly add to traffic and therefore Thatcham will need independent access to the M4 and thus A34 (especially for HGVs) ,	Comments noted.  A Supplementary Planning Document for Sandford has been produced to guide development of the site, including transport infrastructure and services. It is anticipated that a similar document will be prepared for NE Thatcham, in the context of current environment and transport policies.  The Council has published its Local Cycling & Walking Investment Plan to guide future active travel related investment. The LTP Active Travel strategy will also be reviewed as part of a refresh of our Local Transport Plan. The detailed transport modelling being undertaken as part of the Transport Assessment will outline the impact of the proposed Local Plan growth on the local highway network.

Respondent (with lpr ref)	Response	Council Response
	<p>and south, avoiding the level crossing, to the A339/A34 (suggest restricted to 7.5 tonnes as now).</p> <p>Public transport in West Berks is rural in nature and to accommodate a vastly expanding population far more frequent - carbon neutral - bus services operating 7 days a week for much longer hours, will be needed as provided in big towns like Reading.</p> <p>To encourage cycle travel throughout West Berks it needs to be recognised and accommodate that. West Berks is hilly, thus use of electronic bicycles to be encouraged. Cycling is to all but die-hard enthusiasts a "fair weather" activity - hot and sweaty in the summer, cold, and wet in the winter - and to promote widespread travel throughout the year supporting facilities will be required for those not cycling to a place of work. Thus mere hoops for parking cycles are wholly inadequate. Bicycles and especially electronic bicycles, are very expensive. Secure and covered bicycle parking facilities such as lockers, with charging points, will be required at destinations. As will changing and showering facilities.</p>	<p>It is expected that A4 will remain as a District freight route, serving a number of freight sites along the A4 corridor (e.g. Colthrop Ind. Est. and mineral &amp; waste sites in the Beenham area. At present, there are no plans to change this or weight restrictions in the area.</p> <p>The Council has recently published a Bus Services Improvement Plan to outline how it intends to develop bus services in West Berkshire, including rural areas.</p> <p>New micro-mobility technologies, such as electric bicycles, will be encouraged as they emerge. How these will be incorporated into the local transport network will be considered further in the forthcoming review of the Local Transport Plan.</p> <p>Cycling is both a utilitarian and a leisure activity. The Council actively seeks secure and covered cycle parking, plus showers, changing areas and lockers as part of workplace travel plans. The Council, with GWR has provided secure, covered cycle hubs at Newbury and Theale stations, and will explore opportunities to provide similar hubs at other stations or locations.</p>
Keith Hoddinott (lpr1992)	<p><i>Part of wider representation</i></p> <p>ALL developments are being routed onto the already overstretched only river/rail crossing, the A339.</p> <p>It would appear than there is no long-term planning/vision as to where all this extra traffic will go. The recent proposals are only "tinkering at the edges"; &amp; will certainly not be effective in 16 years' time by 2037.</p> <p>All the time, small developments are potentially blocking a possible eastern bypass.</p>	<p>Comments noted</p> <p>It is highly unlikely that the Local Plan will identify the need for new strategic roads, such as a ring road around the north, east and south of the Newbury / Thatcham area. If such a proposition were to be pursued, it is highly likely that the delivery would be tied into significant development. The proposed growth outlined in the draft Local Plan will seek to manage demand for travel through making best use of the existing highway network, with capacity enhancements within the existing network, combined with</p>

Respondent (with lpr ref)	Response	Council Response
	Changes: To formulate & implement a long-term strategy for a ring road around the north, east & south of the Newbury / Thatcham conurbation from the A339 (Vodafone complex), east & north of existing developments; via Pipers Way, onto A339 at Greenham Business Park, & link at "Swan" rdbt., Newtown; & onto Washwater A34 / A343.	measures to develop and encourage sustainable and active travel choices.
Susan Millington (lpr469)	<p>"Have regard to West Berkshire's declared Climate Emergency" is very weak.</p> <p>Proposed amendment: "In line with West Berkshire's declared Climate Emergency, to minimise the impact of all forms of travel on the environment."</p>	<p>Comments noted.</p> <p>Amend the 1<sup>st</sup> bullet point of the policy as follows – <u>'Minimise the impact of all forms of travel on the environment, in accordance with Have regard to the West Berkshire's declared Climate Emergency<sub>2</sub> and Environment Strategy. minimise the impact of all forms of travel on the environment.'</u></p>
Ian Parsons (lpr831)	<p>Changes:</p> <p>Basildon has become a major route for cyclists - which is thoroughly welcomed. It would be good if more signposting of cycle routes were to be done. Also, with the added increase of walkers, thought should be given to making rural roads safer for those not in cars. White lined pavements would be helpful.</p>	<p>Comments noted.</p> <p>The Council actively supports the increase in cycling in all parts of West Berkshire, for both leisure and everyday activities. The development of leisure routes will be further considered as part of the review of the Council's Active Travel Strategy, but we would be willing to work with local communities to develop such initiatives.</p>
Graham Storey (lpr588)	<p>"Have regard to West Berkshire's declared Climate Emergency" is not strong enough</p> <p>Changes:</p> <p>"Have regard to West Berkshire's declared Climate Emergency" to "In line with West Berkshire's declared Climate Emergency, to minimise the impact of all forms of travel on the environment."</p>	<p>Comments noted.</p> <p>Amend the 1<sup>st</sup> bullet point of the policy as follows – <u>'Minimise the impact of all forms of travel on the environment, in accordance with Have regard to the West Berkshire's declared Climate Emergency<sub>2</sub> and Environment Strategy. minimise the impact of all forms of travel on the environment.'</u></p>
Nataliya Topliss (lpr810)	The local roads are congested and cannot cope with existing needs. The transport links are of full capacity with congestion on the A4. As a solicitor, I traveled to work to Reading every day. It took me 1 hour 30 min on average	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>to get from Thatcham to Reading daily. This route should normally take 25 min. I spent the last 10 years travelling to Reading and it is a complete hell to travel on the A4 due to excessive daily congestion. All trains are also overcrowded daily.</p> <p>West Berks Council's strategy of 2012 indentified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Electrification of the railway line between Newbury and Reading has included the provision of new trains offering a higher level of seating capacity. The Council, along with GWR, are improving passenger facilities and car parking at Theale station with the aim of making it a Park &amp; Rail site to serve areas to the west of Reading.</p>
Councillor Tony Vickers (lpr557)	<p>We strongly support this policy.</p> <p>More than any other policy in the draft Plan, the policy and its supporting text is drafted in the spirit of the Climate Emergency and references the Environment Strategy very appropriately. It expresses a vision of the very different and more sustainable future we must seek to attain.</p> <p>We would like to see the words "Active Travel Strategy" in supporting text para.7.17.</p>	<p>Comments noted.</p> <p>Amend the supporting text as follows –</p> <p>'...These active travel modes benefit people's health and are promoted through the Local Transport Plan <u>and supporting Active Travel Strategy</u>, and the Environment Strategy.'</p>
Toby and Gail Woodhouse	<p><i>(Extracted from main representation to SP17 Thatcham)</i></p> <p>Thatcham is already a bottleneck for traffic flowing through the town on the A4 between Newbury and Reading. By introducing a new road network with the proposed traffic calming, traffic lights and roundabouts, the impact of on the flow of traffic will be significant.</p> <p>All of the above will have a knock on detrimental effect on the local roads and quiet lanes in Bucklebury as the additional cars and residents try to avoid the traffic chaos in and around Thatcham and the associated A4 area. The local lanes and roads which are designed with layouts, size and speed limits to support only local traffic will be used as short cuts through to Reading, Newbury and the M4 to avoid the A4 congestion.</p> <p>We note reference is made to the close proximity of the proposed developments to Thatcham Railway Station. The ability to get to the station</p>	<p>Comments noted.</p> <p>The impact of the proposed NE Thatcham development on the local highway network is a key consideration of the LPR Transport Assessment. A highway mitigation package to off-set the predicted traffic impact of the NET site is being developed that will improve performance of the junctions near the site and provide additional capacity on the A4.</p> <p>The Transport Assessment covers the whole of West Berkshire, including the local routes through the Upper Bucklebury. The outline draft highway mitigation package</p>

Respondent (with lpr ref)	Response	Council Response
	<p>at peak times is already near impossible by car. While we appreciate the plan places an emphasis on sustainable travel there is no requirement for residents to comply with this. Cycle ways and pedestrian routes may be included and built by the developers but in poor weather, the dark winter months and for convenience residents will turn to their cars and further impact on the already congested road network.</p>	<p>being developed for the NET site will minimise displacement of traffic from the A4 onto other routes.</p> <p>Improving access to and improving passenger facilities at Thatcham railway station is likely to be a key project for the NET site. It is recognised that as well as improving active travel access to the station, improvements to access by bus and car parking would also be necessary. This also includes a need to make the station more accessible for all who wish to travel. West Berkshire has a good record of working with the rail industry and local communities in the development and delivery of such projects.</p>
<b>Landowners, site promoters and developers</b>		
<p>Lichfield for North East Thatcham Partnership (lpr2403)</p>	<p>We welcome the inclusion of this policy in promoting opportunities for active and sustainable travel. NET is well located to access existing employment, retail and leisure opportunities currently provided within Thatcham through walking and cycling, while the public transport network offers regular services to local towns such as Newbury and Reading, and beyond. The provision of primary schools within the development will remove the need for pupils to travel from the site, while the secondary school will reduce the need for secondary school pupils to travel from Thatcham to Newbury and elsewhere. The additional local facilities and services within the development, which will be within walking distance for local residents, will also internalise many trips which would otherwise require traveling further afield.</p> <p>The proposed development will be supported by a Transport Assessment which will identify suitable mitigation measures to offset the likely impact of the development along key sections of the local highway network.</p>	<p>Comments noted.</p> <p>The NET site is located near to the strategic cycling corridor along the A4 identified in the Council's Local Walking and Cycling Infrastructure Plan between the Gables Way roundabout and Newbury town centre.</p> <p>It is expected that a School Travel Plan will be developed for each new school on the NET site to assist in encouraging sustainable journeys for pupils, parents and staff. It is important that the masterplanning process for the NET site includes permeable neighbourhoods to encourage active travel journeys to be easily made within the site.</p>
<p>Ptarmigan Group (lpr2346)</p>	<p>Draft Policy SP22 sets out the requirements for 'development that generates a transport impact'. Footnote 1 to the policy states that development proposals may not need to fulfil each of the policy criteria and states that clarification is provided in the supporting text. However, the supporting text does not provide sufficient clarification regarding the specific types and</p>	<p>Comments noted.</p> <p>Policies relating to specific types and locations of development are covered elsewhere in the Local Plan. Transport issues would be a material consideration along</p>

Respondent (with lpr ref)	Response	Council Response
	locations of development that are required to meet the criteria of Policy SP22.	other policy areas when applications are determined through the Development Management process. The criteria listed in SP22 relate purely to transport issues that need to be considered.
Savills for Englefield Estate (lpr1533)	Draft LPR Policy SP22 sets out the requirements for ‘development that generates a transport impact’. Footnote 1 to the policy states that development proposals may not need to fulfil each of the policy criteria and states that clarification is provided in the supporting text. However, the supporting text does not provide sufficient clarification regarding the specific types and locations of development that are required to meet the criteria of Policy SP22. In particular, specific recognition should be given to development in rural areas where sustainable transport opportunities may be more limited. Indeed paragraph 84 of the NPPF emphasises that, ‘Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.’ In these instances a balanced approach should be taken to meeting the policy criteria, in order to facilitate appropriate development to support rural communities.	<p>Comments noted.</p> <p>The Local Plan Review contains a number of policies (such as DC1 – Development in the Countryside) to guide and manage development in rural areas, which reflects the rural nature of West Berkshire. DC1 states that “planning permission will not be granted where development would have adverse cumulative effect on the environment or highway safety”.</p> <p>Transport issues, such as accessibility and impact on local highway network, will be one of a number of considerations that will be taken into account as part of the development management process</p>



## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: SP23 Infrastructure requirements and delivery

### (Proposed Submission LPR Policy: SP24 Infrastructure requirements and delivery)

Number of responses received: 12

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
N/A		
<b>Statutory consultees</b>		
Wokingham Borough Council (lpr1480)	<p>Policy SP 23 relates to Infrastructure requirements and delivery. It states:</p> <p>“The key infrastructure schemes required to facilitate new development and secure the delivery of development within this plan include, but are not limited to, those schemes set out within the Infrastructure Delivery Plan. A schedule of the infrastructure which has been assessed as critical to the delivery of the Local Plan Review will be included within an appendix.”</p> <p>WBDC’s background evidence webpages note that an updated Infrastructure Delivery Plan (IDP) has been produced and will be published shortly. Similarly, Appendix 5 – Critical Infrastructure Schedule of the Infrastructure Delivery Plan is left blank to be updated at a later stage in the plan making process and there is no Key Diagram within the plan. At the time of writing, it has not been possible to consider the infrastructure interventions deemed necessary to deliver and support the growth proposed in the Plan.</p>	<p>Comments noted.</p> <p>Policy SP23 will be amended to delete the reference to ‘critical’ infrastructure as follows -  ‘The <u>key strategic and local infrastructure schemes</u> required to facilitate new development and secure the delivery of development within this plan <del>include, but are not limited to, those schemes set out within the Infrastructure Delivery Plan.</del> <u>will be linked to the phasing of new development. Phasing and specific infrastructure requirements are set out within the Infrastructure Delivery Plan (IDP).</u> <del>A schedule of the infrastructure which has been assessed as critical to the delivery of the Local Plan Review will be included within an appendix.</del>’</p> <p>The Draft IDP was published on the Council’s website in October 2021.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Notwithstanding, a Transport Assessment Report has been produced. All existing commitments and the development proposed within the Plan has been modelled to 2037. An initial list of junctions that would be impacted by development has been identified. Transport modelling is an iterative process so further model runs will be necessary as the strategy evolves. Future work will include identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs.</p> <p>It is recommended that WBC requests to be fully engaged in the production of the IDP, future transport modelling, and any other infrastructure evidence in order to understand at the earliest opportunity what the potential impacts of development would be and what infrastructure is proposed to mitigate this. This will be a key Duty to Cooperate issue moving forwards.</p>	<p>This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review. The request to be fully engaged in the production of the IDP is noted and the Planning Policy Team will ensure that Wokingham Borough Council is re-consulted.</p> <p>At the time of writing no further representations were made by Wokingham Borough Council on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.</p>
Hungerford Town Council (lpr145)	The scope here needs to include health and education services being able to absorb the effects of development with detracting from existing service levels.	<p>Comment noted.</p> <p>The Draft IDP was published on the Council's website in October 2021.</p> <p>This document includes a schedule of infrastructure requirements, including those for health and education. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review. At the time of writing no further representations were made by Hungerford Town Council on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.</p>
Shaw-cum-Donnington Parish Council (lpr217)	<p>Response from Shaw-cum-Donnington Parish Council on Local Plan Consultation</p> <p>SP23 Infrastructure requirements and delivery.</p> <p>We support the policy but note with the North Newbury development the developers have avoided any social infrastructure. For example a</p>	<p>Support noted.</p> <p>As a result, no further amendments need to be made in light of this representation.</p> <p>Development North of Newbury comprises land to the east and land to the west of the A339 (Vodafone roundabout).</p>

Respondent (with lpr ref)	Response	Council Response
	reasonable number of allotments and their reluctance to provide the promised community centre.	<p>Planning permission for land to the east was granted in 2020 (19/00442/OUTMAJ and associated reserved matters) for phase 1-4 (DWH) and planning permission to the west for phase 7 (Taylor Wimpey). The permission was subject to developer contributions by way of s106 agreement (including social housing, land and contributions towards a primary school, land for open space (including public open space, allotments, woodlands and landscaping corridors). The Community Infrastructure Levy also applies and over £3M is due to be collected by January 2023. The levy can help other social infrastructure if identified as a requirements by the Council and contributions given over to the parish council can also contribute towards any other social infrastructure in the area, including the allotments and/or a community centre. Thus the development has contributed to social infrastructure projects.</p> <p>As a result, no further amendments need to be made in light of this representation.</p>
Newbury Town Council (lpr2252)	We cannot be expected to comment on this policy until the Infrastructure Delivery Plan is published.	<p>Comment noted.</p> <p>The Draft IDP was published on the Council's website in October 2021.</p> <p>This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.</p> <p>At the time of writing no further representations were made by Newbury Town Council on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.</p>

Respondent (with lpr ref)	Response	Council Response
Stratfield Mortimer Parish Council (lpr408)	The policy/text should include the requirement for all developments “local knowledge on infrastructure issues related to the potential development be sought either via a Parish Council or included in an NDP”.	Commented noted. However it is not considered necessary to include additional text to require all developments to take into account local knowledge. This happens through the planning application process through the planning application consultation process. Either an infrastructure stakeholder will indicate certain infrastructure requirements or the parish council can do so within the context of the NP. The development plan is read ‘as a whole’, therefore the NDP will link to the Local Plan Review, once it is adopted and then form part of the development plan. No further amendments need to be made in light of this representation.
Greenham Parish Council (lpr906)	GPC cannot be expected to comment on this policy until the infrastructure delivery plan is published.	<p>Comment noted.</p> <p>The Draft IDP was published on the Council’s website in October 2021.</p> <p>This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.</p> <p>At the time of writing no further representations were made by Greenham Parish Council on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.</p>
<b>General consultation bodies</b>		
Canal and River Trust (lpr883)	<p>SP 23 support but suggest amendments</p> <p>This policy should be amended to include mention that existing infrastructure, both on and off site may need to be improved or extended, rather than just deal with the provision of new infrastructure. However, we are pleased to note that the supporting text mentions blue infrastructure.</p>	<p>Support noted.</p> <p>The Draft IDP was published on the Council’s website in October 2021.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>This document includes a schedule of infrastructure requirements, including blue infrastructure (canals and Rivers). The document states that “The Canal and River Trust will be contacted and comments sought on the infrastructure requirements arising from the Local Plan Review”. The Draft IDP will then be updated to include any comments and will be published alongside the Regulation 19 Local Plan Review.</p> <p>At the time of writing no further representations were made by the Canal and River Trust on the Draft IDP (October 2021).</p> <p>In relation to the suggested wording – whilst it is recognised that existing infrastructure on and off site may need to be improved, the policy reflects government guidance in that a development cannot be expected to address deficiencies in existing infrastructure.</p> <p>As a result, no further amendments need to be made in light of this representation.</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr302)	'Improvements' have previously been made to the Ramsbury Road / Ermin Street junction but this has in fact rendered the junction even more dangerous. Sometimes, it is clear that further development is just not appropriate.	<p>Comment noted.</p> <p>No further amendments need to be made in light of this representation given that this is a specific highway matter.</p>
Keith Hoddinott (lpr1990)	<p>Full representation relating to drainage and highways infrastructure is attached</p> <p>Summary</p> <p>I press the Council, through the MP (Mrs. Farris) &amp; the LGA (&amp; any other bodies they see fit – eg. professional &amp; consumer bodies), to ensure that Sections 3 &amp; 42 of the 2010 Flood &amp; Water Management Act be</p>	<p>Comment noted.</p> <p>The Draft IDP was published on the Council’s website in October 2021.</p> <p>This document includes a schedule of infrastructure requirements. This includes drainage schemes. The Draft</p>

Respondent (with lpr ref)	Response	Council Response
	implemented & be made mandatory for such infrastructures to be adopted alongside the outline planning approval & subsequent detailed approvals, as a matter of urgency; or implement suitable planning conditions.	IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.  At the time of writing no further representations were made by Keith Hoddinott on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.
Councillor Tony Vickers (lpr558)	We support this policy but cannot comment at this stage because there is no detail: the Delivery Plan doesn't yet exist.  Changes: We need to see at least a draft Appendix 5 to give some idea of what kind of infrastructure, as well as its amount and location, before we can suggest change. The "change" is therefore to fill in the blank!	Support noted.  The Draft IDP was published on the Council's website in October 2021.  This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.  At the time of writing no further representations were made by the respondent on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.
<b>Landowners, site promoters and developers</b>		
Lichfields for North East Thattham Partnership (lpr2404)	More detail on the potential key infrastructure schemes required to facilitate new development and secure the delivery of NET are set out in TPA's note at Appendix 3. This will need revisiting on publication of the new IDP which will include a schedule of the infrastructure which has been assessed as necessary to enable the development to proceed.	Comment noted.  The Draft IDP was published on the Council's website in October 2021.  This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.

Respondent (with lpr ref)	Response	Council Response
		At the time of writing no further representations were made by North East Thatcham Partnership on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.
Bloor Homes & Sandford Farm (lpr2174)	This policy refers to a schedule of the infrastructure which has been assessed as critical to the delivery of the Local Plan Review to be included within an appendix. This is not appended to the consultation document. We reserve the right to make further representations in relation to this in due course.	<p>Comment noted.</p> <p>The Draft IDP was published on the Council's website in October 2021. This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.</p> <p>At the time of writing no further representations were made by Bloor Homes and Sandford Farm on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.</p>

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR ref: Chapter 8 Non-strategic site allocations

#### (Proposed Submission LPR ref: Chapter 8 Non-strategic site allocations)

Number of responses received: 9

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr146)	No comments	Response noted.
Newbury Town Council (lpr2251)	We only comment in detail on those that are within or adjacent to Newbury Settlement Area. However, in general we believe that a few more small sites need to be identified outside of major urban areas in Rural Service Centres and Service Villages, for reasons given above (SP nn). We would prefer these to come forward through community led neighbourhood planning.	Comments noted.  The Council's strategy is for a mix of sites: strategic sites such as Sandford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.



Respondent (with lpr ref)	Response	Council Response
		<p>Neighbourhood plans can include allocations, and the adopted Stratfield Mortimer NDP includes an allocation. The Hungerford and Lambourn NDPs are currently in preparation and these will also include allocations.</p> <p>The Parish of Newbury was designated as a Neighbourhood Area in August 2021, and this is the first formal stage in the preparation of a neighbourhood plan. The neighbourhood plan for Newbury could include allocations for residential development.</p>
BBOWT (lpr975)	<p>We welcome the measures to protect biodiversity within the policy wording but suggest this is strengthened to ensure national policy and legislation is enforced. Throughout the non-strategic site allocations, the following wording is used in the policy wording for sites:</p> <p><i>An extended phase 1 habitat survey will be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any protected species are not adversely affected.</i></p> <p>There is not enough emphasis on the requirement to mitigate for effects on habitats and we suggest the wording should not be limited to protected species as it does not cover obligations to protect designated sites or consider habitats and species of principal importance (as listed under Sections 40 and 41 of the Natural Environment and Rural Communities Act (NERC) 2006). We suggest the wording is amended to read:</p> <ul style="list-style-type: none"> <li>An extended phase 1 habitat survey will be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any <b>designated sites and protected and/or notable habitats and/or</b> species are not adversely affected.</li> </ul> <p>The policies for non-strategic site allocations also frequently refer to protection measures for ancient woodland. This includes “<i>Appropriate buffers of at least 15 metres between the development and the areas of ancient woodland</i>” and “<i>Provide a 15m buffer to ancient woodland</i>”.</p> <p>Natural England and Forestry Commission (2018) standing advice (which is a material planning consideration) does state that a buffer zone of at least 15 metres is required</p>	<p>Comments noted.</p> <p>The non-strategic site allocation policies will be amended to include the suggested wording in order to increase emphasis on the requirement to mitigate for effects on habitats. The amended text will read as follows: ‘An <u>Ecological Impact Assessment (EclA)</u> will be required. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any <u>designated sites and/or protected habitats and/or</u> species are not adversely affected.’</p> <p>Since the Regulation 18 consultation, Natural England’s standing advice on ancient woodland was revised in January 2022 (<a href="https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions">https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions</a>) to state that the following: <i>Proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic. For ancient or veteran trees (including those on the woodland boundary),</i></p>

Respondent (with lpr ref)	Response	Council Response
	<p>for ancient woodland but also states that “<i>The size and type of buffer zone should vary depending on the scale, type and impact of the development.</i>” Therefore, the buffer zone should not be determined at the allocation stage unless it had been informed by a detailed, site-specific assessment. We recommend that the policy wording for any site allocations within close proximity to ancient woodland is revised to:</p> <ul style="list-style-type: none"> <li>• Appropriate buffers between the development and the areas of ancient woodland will be provided that are of a sufficient size and type to negate any impact on the ancient woodland and supported by evidence from a detailed site-based assessment.</li> </ul>	<p><i>the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area.</i></p> <p>Allocations which are adjacent to ancient woodland will include in the site specific policy the following requirement: <u>‘Provide an appropriate buffer of at least 15 metres between the development and ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development.’</u></p>
Savills (UK) Ltd for Thames Water (lpr1742)	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>Thames Water’s site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites [are set out under each site policy], but more detailed modelling may be required to refine the requirements.</p> <p>There’s a number of sites which fall within our source protection zones which we’ve provided comment on/. It is important to recognise these zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency’s approach to groundwater protection (available at <a href="https://www.gov.uk/government/publications/groundwater-protection-position-statements">https://www.gov.uk/government/publications/groundwater-protection-position-statements</a>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <p><b>Process</b></p> <p>We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn’t happen it could lead to delays in the delivery of vital infrastructure</p>	<p>Comments noted. Proposed Submission LPR Policy DM6 has regard to water quality, and the policy is clear that waterbodies in the District will be protected and enhanced. If development is likely to have an adverse impact on water quality, then the policy requires that a detailed water quality assessment will be required. The policy goes on to state that appropriate measures will be required to be undertaken by the developer to ensure that a proposed development does not contaminate surface or groundwater resources.</p> <p><b>Process:</b> Comments noted.</p> <p><b>Network:</b> It is proposed to include a requirement in all of the site allocation policies for an integrated water management study that would be submitted at the planning application stage. The requirement will be worded as follows:</p> <p><u>‘An integrated water supply and drainage strategy will be provided in advance of development to ensure the</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Network</b> Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here: <a href="https://www.thameswater.co.uk/developers/charges">https://www.thameswater.co.uk/developers/charges</a> The time to deliver upgrades shouldn't be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn't outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service: <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</a> We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section. Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>	<p><u>provision of adequate and appropriate water infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.</u><sup>1</sup></p>
Environment Agency (lpr1678)	<p><i>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</i></p> <p><u>Water Cycle Study Phase 1 – Scoping</u> As mentioned [under relevant individual site allocation policies] there are some sites that would require further investigation and analysis in a Phase 2 Water Cycle Study (WCS). This would need to involve more in depth modelling to ensure any development did not contribute to deterioration of a waterbody, or prevent a waterbody getting to good status under the Water Framework Directive. The WCS Phase 1 scoping has also highlighted many WWTWs that may require upgrades, and we would expect to see further analysis of these sites in Phase 2 WCS.</p> <p><u>Level 2 Strategic Flood Risk Assessment</u> We have reviewed the Local Plan alongside the Level 2 Strategic Flood Risk Assessment (SFRA) as part of our cost recovery framework agreement with West</p>	<p>Comments noted.</p> <p><u>Water Cycle Study Phase 1 – Scoping:</u> A Phase 2 Water Cycle Study has been produced and it was published in September 2021. It can be viewed at: <a href="https://info.westberks.gov.uk/evidencebase">https://info.westberks.gov.uk/evidencebase</a>.</p> <p><u>Level 2 Strategic Flood Risk Assessment (SFRA):</u> The Level 2 SFRA has been updated to include the assessments of the following sites:</p> <ul style="list-style-type: none"> <li>• Land at Poplar Farm Cold Ash;</li> <li>• Land West of Spring Meadows, Great Shefford</li> <li>• Sandford Strategic site allocation</li> <li>• Land adjoining Lynch Lane, Lambourn;</li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>Berkshire. We provided our comprehensive comments separately on this document in October 2020. We appreciate you allowing us to provide detailed comments, we hope our review of this document at an early stage will inform you going forwards, and will continue to work with you on developing this document.</p> <p>There were a number of sites put forward in the Local Plan which do not appear to be discussed in the SFRA, despite some significant flooding issues relating to these sites. For example, The 'North East Thatcham' strategic site contains an area which is an existing flood risk management structure, recently completed by West Berkshire Council (Floral Way Flood Storage Area). In addition, further surface water management schemes are being planned by West Berkshire Council within this area, including 'East Thatcham'. This site does not appear to be included in the SFRA, however given the presence of flood defences guidance will be required (in the SFRA level 2 and the local plan) as to where development would, and would not be appropriate. It is crucial that both existing flood defences, and land proposed as future flood storage areas are safeguarded against future development. This is to ensure that flood risk is not increased elsewhere, and that development is appropriately flood resistant and resilient in accordance with Paragraph 163 of the NPPF.</p> <p>Furthermore any site specific Flood Risk Assessment would need to carefully consider the impact of the development on the surface water management scheme(s).</p> <p>There are a number of other sites need to be included in the level 2 SFRA (and are not currently included):</p> <ul style="list-style-type: none"> <li>• Land at Poplar Farm Cold Ash (Site Ref: HSA 6) - The local plan highlights the need for a surface water detention basin to accommodate development drainage</li> <li>• Land adjacent to Junction 12 of M4, Bath Road, Calcot (Site Ref HSA 12) – Contains an area of Flood Zone 2</li> <li>• Land off Stretton Close, Bradfield Southend (Site Ref: HSA 22) - The Local plan states that the site flooded during January/February 2014</li> <li>• Land West of Spring Meadows, Great Shefford (Site Ref: GS1)- While only a small area of site is at risk from surface water, it should be highlighted that the village has a significant history of groundwater/surface water flooding and this will need to be assessed in more detail in relation to the site with a site-specific</li> </ul>	<ul style="list-style-type: none"> <li>• Pirbright Institute Site, High Street, Compton; and</li> <li>• Long Copse Farm, Enborne.</li> </ul> <p>The following sites have planning permission, therefore the Level 2 SFRA has been updated to include a planning history overview and the flood risk and drainage considerations that were made as part of the planning application:</p> <ul style="list-style-type: none"> <li>• Land off Stretton Close, Bradfield Southend;</li> <li>• Land off Charlotte Close, Hermitage; and</li> <li>• Land to the south east of the Old Farmhouse, Hermitage.</li> </ul> <p>The Level 2 SFRA can be viewed at: <a href="https://info.westberks.gov.uk/sfra">https://info.westberks.gov.uk/sfra</a>.</p> <p>The site Land adjacent to Junction 12 of M4, Bath Road, Calcot was not subject to a Level 2 SFRA as the allocation will be removed from the proposed submission version of the Local Plan Review. This is because the site is close to completion.</p> <p>North East Thatcham was considered within the Level 2 SFRA produced for the Core Strategy, one of the development plan documents that forms part of the current Local Plan. This will be included on the Council's website alongside the other evidence for the Local Plan Review at: <a href="https://info.westberks.gov.uk/sfra">https://info.westberks.gov.uk/sfra</a>.</p> <p>In addition, extensive additional work on the location and safeguarding of flood defences is being done with the promoters of the North East Thatcham site.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Land off Charlotte Close, Hermitage (Site Ref: HSA 24) - Part of the site falls within a critical drainage area</li> <li>• Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25) - Part of the site falls within a critical drainage area</li> <li>• Sandleford Strategic site allocation – a Main river runs to the south of the site, and parts of the site fall within Flood Zones 2 and 3</li> <li>• Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19) – a Main river runs along edge of site and parts of the site fall within Flood Zones 2 and 3</li> <li>• Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22) - parts of the site fall within Flood Zones 2 and 3</li> </ul> <p>Long Copse Farm, Enborne (Site Ref: TS2) - parts of the site fall within Flood Zones 2 and 3.</p> <p>We are happy to continue to work with you to support your Level 2 SFRA. Please get in touch with us if you require further explanation.</p>	
<b>General consultation bodies</b>		
Heritage Forum (lpr84)	<p>RSA20. The correct name of the road is New Road Hill. The development of 14 houses on land on this road and north of the A4 has recently been turned down because of the dangerous access.</p> <p>RSA1. We agree that the design and scale of the Kennet Centre development should complement existing buildings and the Newbury Conservation Area.</p>	<p>Comments noted.</p> <p><u>RSA20:</u> See Council response to representations made in respect of RSA20 Land North of A4 Bath Road, Woolhampton.</p> <p><u>RSA1:</u> See Council response to representations made in respect of RSA1 Kennet Centre, Newbury.</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr561)	<p>We accept that the list of non strategic sites in the Plan will change before the Reg 19 draft is prepared and probably again before the new Plan is adopted. We know of several more HSA DPD sites listed in this draft that have progressed towards completion.</p>	<p>Comments noted.</p> <p><u>Allocation of further HELAA sites:</u></p>

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	<p>We also wish to propose some HELAA sites for the Plan that we believe are deliverable in the Plan period but have so far not been included in the draft Plan and we believe some sites from HELAA that have been included in this draft should be capable of taking a higher number of dwellings.</p> <p>In total, having studied the HELAA in some detail, we have identified sites - some of which have been partially taken up in the draft Plan - which could take an additional 450 new dwellings. Most of these are in the AONB but in Rural Service Centres of Service Villages. Some of these may come forward in Neighbourhood Plans but some are not in villages that have yet proposed to undertake a NP.</p> <p>In addition, we have identified about 500 dwellings that could be accommodated within DEAs without compromising their ability to provide increased and more appropriate employment. Add in the several other sites (of over 10 dwellings capacity) which will undoubtedly come forward as 'windfall' and we do not think that our alternative non-strategic site allocations will compromise the overall spatial strategy.</p> <p>We will detail our changes in the next draft but in some cases, for DSA sites listed in this draft, we have given our suggestions for increased allocations.</p>	<p>It should be noted that the HELAA is one of the evidence documents for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites. It does not recommend which sites should be allocated.</p> <p>Those sites which were not assessed as 'not developable within the next 15 years' in the HELAA were subject to further assessment as part of the site selection work to determine which sites should be proposed for allocation.</p> <p>The site selection work considered various strands of evidence that included:</p> <ul style="list-style-type: none"> <li>• Settlement hierarchy – sites in settlements / areas outside of the settlement</li> <li>• Settlement boundaries</li> <li>• Strategic Flood Risk Assessment</li> <li>• Sustainability Appraisal</li> <li>• Detailed site assessment.</li> </ul> <p>The development potential of sites has been informed by the West Berkshire Density Pattern Book Study.</p> <p>Need and demand for employment land in West Berkshire remains strong. Designated Employment Areas (DEAs) are considered to represent coherent areas of employment land containing established concentrations of office, industrial and warehousing development. These areas allow business uses to locate together, complement and support one another, with relatively little disturbance to surrounding residential areas. It is therefore important to ensure the role and function of each DEA is maintained and strengthened to enhance economic growth so as to prevent their economic function being diluted and</p>

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		potentially compromised through amenity concerns or a lack of competitiveness.
<b>Landowners, site promoters and developers</b>		
Carter Planning for Mr. R.L.A. Jones (lpr1903)	<p>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review. This includes the maps referred to in the representation below.</p> <p><b>Objection.</b> Include “Land between Folly Road, Rockfel Road and Stork House Drive” (SHLAA site reference LAM007) in the Draft Plan. In the West Berkshire Housing Site Allocations Development Plan Document - Inspector’s Report March 2017 by David Hogger BA MSc MRTPI MCIHT he stated:- “88. Another site in the settlement between Folly Road and Stork House Drive (LAM007 in the SHLAA) displays similar characteristics to the allocated site at Lynch Lane. However, the proposed allocation is sound and there is no justification at this time for allocating further development within the AONB because the limit of 2,000 dwellings, as set out in the CS, would be significantly breached. <u>I note, however, that there is a commitment from the Council to reconsider this site as part of the WBLP preparation</u>”.</p> <p><u>This has not been done and the site has not been included in the Draft Plan.</u> To ensure Section 8 Policy RSA is justified, sound and effective, Site LAM007 should be restored to the Plan (in place of site RSA23) as previously suggested in the July 2014 Preferred Options Draft in the text of the Plan and in the settlement boundary review as follows:- Policy RSA ?? - Land between Folly Road, Rockfel Road and Stork House Drive (SHLAA site reference LAM007) Just over one hectare of this site is considered to be developable for approximately 24 dwellings. The developable area excludes the middle section of the site, reflecting the outcome of the Landscape Assessment which indicates that development on part of the site would be acceptable as long as the required mitigation measures are adhered to.</p>	<p>Comments noted.</p> <p>The Regulation 18 version of the Local Plan Review (LPR) did not include any allocations in Lambourn Parish as a Neighbourhood Plan is being prepared and this will allocate sites for development.</p>

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	<p>The site is well related to the existing settlement and close to local services, facilities and open countryside. It is proposed that the site is allocated for low to medium density development, with a mix of dwelling sizes and types including affordable housing. Access can be obtained either from Folly Road or from Rockfel Road, with a potential additional pedestrian access onto Holly Road.</p> <p>Full ecological and archaeological surveys will be required to inform any development proposal.</p> <p>Map [see attachment]</p> <p><u>Background</u></p> <p>Our Client, Mr R L Jones has been involved in the equestrian industry in Lambourn for many years.</p> <p>The representations by Carter Planning Limited on his behalf (and on behalf of his family and Company interests) seek to demonstrate that the Draft Plan is fundamentally unsound because it underestimates the required housing provision generally. as a result it produces too few housing sites to meet needs or be flexible. More specifically our Client takes exception to the failure by the Council to consider site LAM007 despite the Council making a commitment to do this at the last Examination and despite its late omission from the current Plan which has previously been through consultation and examined in detail and found to be acceptable (and its replacement by Site RSA 23, formerly LAM015 which had not).</p> <p>This failure undermines the Council's stated criteria for the selection of sites and settlement boundaries in the rest of the Draft Plan.</p> <p>Our Clients representations therefore seek to increase housing which in turn means and increase in housing sites. As a result either the addition of SHLAA site LAM007 as having previously been acceptable in all regards to meet this need, or, if the Inspector reduces the housing need then the replacement of site RSA 23 by site LAM007 (and a re-examination of the allocation and capacity of Site RSA 22).</p> <p>Site LAM007 is located in an area where recent development has occurred over time. It is well located in relation to the heart of the village and is contained by development on three sides. It is a site which can be flexible in the amount of development which it supplies.</p> <p>In respect of site LAM007 the Council's Draft Plan is neither positive nor justified, in that LAM007 is totally and promptly deliverable and consistent with national policy, which may not be the case with other sites.</p>	



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	<p>Facts and experience show that, contrary to assertions made by the Council and others previously, mixed housing can be provided on site, LAM007, in a manner that is <u>beneficial</u> to the community and horse racing industry, in contradiction to those claims. It is still not clear why Site LAM007 was suddenly excluded from the last Plan and site LAM015 included and LAM005 enlarged. It seems likely that this is only due to incorrect evidence regarding our Clients' adjoining stables. see below.</p> <p>LAM007 was previously <u>included</u> as a preferred site in the 2014 Consultation Issues and Options Draft when the Council concluded:-</p> <p><i>The principle -</i>  <i>The Core Strategy sets out the Spatial Strategy for the District and provides an overall framework to guide development over the plan period. The Core Strategy also outlines a housing requirement for the District to 2026, along with a spatial distribution to identify where this housing will be provided.</i></p> <p><i>The Core Strategy identifies Lambourn as a rural service centre within a Settlement Hierarchy. This means that Lambourn, along with the other rural service centres, has a range of services and reasonable public transport provision, with opportunities to strengthen its role in meeting the requirements of surrounding communities. As such, it is expected that Lambourn will accommodate some additional housing growth to 2026.</i></p> <p><i>Policy ADPP5 sets out how the spatial strategy will be delivered in the AONB. The Housing Site Allocations DPD sits underneath the Core Strategy and within this clear framework. The Housing Site Allocations DPD will allocate non-strategic housing sites for development adjacent to the existing settlement boundaries of those settlements identified within the settlement hierarchy. As such a review of settlement boundaries will take place as part this DPD.</i></p> <p><i>The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB. In order to ensure that the diversity and local distinctiveness of the landscape character is conserved and enhanced, the natural, cultural and functional components of the landscape character will be considered as a whole in accordance with Core Strategy policy CS19.</i></p> <p><i>One of the consultation responses set out above outlines that '2 suitable sites have been discounted for no apparent reason'. Both these sites (LAM004 and LAM006) have been ruled out for landscape reasons. The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma) carried out a Landscape Sensitivity</i></p>	

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	<p><i>Assessment (LSA) on sites submitted within the AONB. This work concluded that both sites LAM004 (Land off Bockhampton Road) and LAM006 (Land at Wantage Road and Northfields) should not be pursued for development due to the landscape impact.</i></p> <p><i>With regard to the housing type and mix, policy CS4 of the Core Strategy outlines the Council's approach and states that residential development will be expected to contribute to the delivery of an appropriate mix of types and sizes to meet the housing needs of all sectors of the community, having regard to the local context and relevant evidence sources.</i></p> <p><i>The Council's Archaeology Team has been consulted on the site and has concluded that a variety of archaeological features are in close proximity and on the site resulting in a high archaeological potential. Further investigation and evaluation will be required through the production of Heritage Impact Assessment. This will need to be carried out as part of any planning application to inform the development of the site. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy.</i></p> <p><i>The Council's Ecologist has been consulted and has concluded that the site is possibly Chalk Grassland. An extended phase 1 habitat survey would be required together with further detailed surveys arising from that as necessary. Appropriate avoidance and mitigation measures would need to be implemented, to ensure any protected species were not adversely affected. Should the site be taken forward as an allocation within the plan this will be set out within an allocation policy. The site is located over 600m (as the crow flies) from the River Lambourn, a SSSI/SAC, and it is essential that any development on the site will not adversely affect the SAC/SSSI.</i></p> <p><i>The site is not within a Flood Zone and does not sit within an area of surface water flood risk. The site is located adjacent to a groundwater emergence zone but the risk of flooding on this site is considered low. Given the site is over 1 hectare in size a Flood Risk Assessment (FRA) would be required to support any planning application on the site in accordance with policy CS16 of the Core Strategy.</i></p> <p><i>This site can accommodate up to 24 houses that will generate circa 144 daily vehicle movements including circa 14 during the 08.00 to 09.00 AM peak. It is considered that given the size of the development, the traffic impact from the proposal would be limited. Access can be obtained from Folly Road, but it probably wouldn't be appropriate considering the rural nature of the road. An alternative place for access would be via Rockfel Road. This would also connect the site to footways in the vicinity. There are currently no footways along Folly Road. A pedestrian access onto Folly</i></p>	

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	<p>Road would also be welcomed. There are footways and bus stops within the vicinity where bi-hourly services pass to Hungerford and Newbury. The site is also within walking and cycling distance of Lambourn centre.</p> <p>Existing pressure on some local services and facilities is recognised. The Infrastructure Delivery Plan (IDP) prepared alongside the Core Strategy considered all the infrastructure (including schools and doctors) that would be required to support the development of 10,500 new homes (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers to support the Housing Site Allocations DPD once the site allocations have been confirmed and any necessary infrastructure improvements will be taken forward. Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. All new development will be subject to the Community Infrastructure Levy (CIL) which was implemented by the Council on 1 April 2015. CIL is a levy charged on most new development and the money is used to pay for new infrastructure required as a result of the new development. Financial contributions towards mitigating the impact of an increased population on infrastructure (such as the NHS and Education provided by West Berkshire Council) could be sought through CIL. Whilst CIL replaces most of the previous system of developer contributions collected under Section 106, it will still be necessary to have S106 agreements under certain circumstances, for example to provide affordable housing, or provide infrastructure on site, or pay for infrastructure improvements required off site but specifically as a result of a development.</p> <p>In particular, consultation has taken place with Thames Water and they have not raised any concerns regarding water supply or waste water capability in relation to this site. It should be noted that infiltration of groundwater into the network has been identified as a strategic issue within Lambourn, therefore should development come forward on this site an integrated water supply and drainage strategy would be required.</p> <p>The Core Strategy is clear that the conservation and enhancement of the natural beauty of the landscape will be the paramount consideration in assessing sites for development within the AONB.</p> <p>The Council's landscape consultant (Kirkham Landscape Planning Ltd/Terra Firma Consultancy) has carried out a Landscape Sensitivity Assessment (LSA) on the site and recommended that only the land adjacent to Folly Road and below the 150m AOD</p>	

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	<p><i>contour in the south of the site be developed. Development on these parts of the site would be subject to a number of conditions, along with the protection and enhancement of key landscape features (set out within the LSA). The LSA also recommended that the larger sites within Lambourn, LAM005 and LAM007, are either only developed in part concurrently, or either one or the other selected, to continue the pattern of sequential small developments in the village.</i></p> <p><i>A Landscape and Visual Impact Assessment (LVIA) would be required as part of any planning application for development on this site to ensure any proposed development conserved and enhanced the surrounding landscape of the AONB. The requirement to provide this work as part of a planning application will be outlined within an allocation policy for the site should it be taken forward as an allocation within the plan.</i></p> <p><i>The Council's Environmental Health Department has been consulted on the Housing Site Allocation DPD Preferred Options and will have further opportunity to comment throughout the process. No concern has been raised regarding this site. The site is at risk of groundwater contamination given the local aquifer and the level of risk and any necessary mitigation measures will be explored further through a Flood Risk Assessment to be provided as part of any planning application.</i></p> <p><i>The racehorse industry plays a vital role within the local rural economy of Lambourn and surrounding areas. It is evident from the consultation responses that the site is currently used as turnout paddocks for an adjacent yard. As such the loss of the site for housing development would be contrary to policy CS12 of the Core Strategy. Policy CS12 aims to prevent pressure for redevelopment of existing facilities to other uses and the fragmentation of existing sites. Such pressures could lead to the decline of the industry locally, threaten the character and form of the settlement and increase pressure for replacement facilities in environmentally sensitive areas. Protecting yards from development for alternative uses is particularly important to the Council. (Note this is incorrect for reasons given below).</i></p> <p><i>As part of the Housing Site Allocations DPD the Council will be reviewing the settlement boundaries of those settlements within the settlement hierarchy of the Core Strategy. Criteria for this review were consulted upon as part of the Preferred Options consultation in 2014.</i></p> <p><i>Completed developments are already taken into account in terms of the housing requirement/numbers. Such areas of land adjacent to the settlement boundary will be considered further as part of the settlement boundary review</i></p>	

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	<p>The site LAM007 was also comprehensively tested by Kirkham Landscapes in 2011 who concluded:-</p> <p><u>Relationship with adjacent settlement</u>  <i>The site is surrounded on 3 sides by housing, with 20th century medium density and more recent development to the north east and south east boundaries, and older, low density housing across the road to the north west</i>  <i>The lower density housing occurs up to the 170m AOD contour, with higher density on the lower slopes, below 150m. The site itself extends up to 170m AOD with the majority below 165m AOD</i>  <i>The site contains horse paddocks and stable buildings</i></p> <p><u>Relationship with adjacent wider countryside</u>  <i>The site has some relationship with the countryside to the south west, which is a continuation of the east facing valley side, but hedgerows around and within the site, including a tall, conifer hedge disconnect the site visually from the countryside beyond</i>  <i>The site lies on slopes dropping into the valley and the settlement away from the extended wider landscape</i>  <i>Impact on key landscape characteristics</i>  <i>No woodlands are affected</i>  <i>Potential for replacing the incongruous conifer hedgerow with more appropriate planting</i>  <i>Other boundary hedges made up of native species are important features</i>  <i>Site currently in use as paddocks</i></p> <p><u>Impact on key visual characteristics</u>  <i>Not typical of the wider LCA – less exposed and smaller in scale</i>  <i>Development of the whole site would be prominent in views from the surrounding Downs and from within the settlement</i></p> <p><u>Impact on key settlement characteristics</u>  <i>Some appropriate development would not be out of keeping with existing settlement pattern</i></p> <p><u>Summary of compliance with PPS7 paragraph 21</u></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>Development on part of this site, subject to the recommendations below, would result in little harm to the natural beauty of the AONB. It is recommended that only the land adjacent to Folly Road and below the 150m AOD contour in the south of the site be included</i></p> <p><u>Recommendations</u>  <i>Development on this site should be subject to the following conditions and the protection and enhancement of the following features:  Low density, linear housing (similar to that north of Folly Lane would be the most appropriate form of development at the higher elevation, and  Higher density, similar to the housing to the east, on the lower ground in the eastern part of site.  Views from the surrounding countryside would need to be carefully considered  New planting would be important in integrating the buildings into the landscape, including the replacement of the conifer hedges.  An area between the two portions of the site for development would need to be left as open field or open space to reduce the overall impact of the development</i></p> <p><u>Our Client.</u>  Our Client and his wife have lived in Lambourn for over 40 years, as a successful jockey and trainer, in the employ of others, and for the majority of that period, self-employed in the industry. During that period they have consistently used capital gained from housing development in Lambourn to heavily invest in the horse racing industry, including a new stables, upgrading another, provision of lads' accommodation units, lunging rings, a horse walker, an innovative paper bedding business, and other facilities. They currently have a planned programme of further development in the horse racing facilities within their ownership, including a potential new yard, upgrading of boxes, a lads' hostel and a manager's unit, which is being discussed with others, but this programme will not proceed without investment within their capabilities.  In previous submissions our Clients have consistently stated that the subject land is not part of any racing establishment, is in different ownership, and that the stables will continue. The land is agricultural.</p> <p><u>Background.</u>  After long periods of previous DPD consultations, including landscape, archaeological,</p>	

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	<p>highways, local community open day and parish council etc. assessments, and in the knowledge of horse racing issues during the consultation process the Council concluded in 2013 and again in 2014 that the site be considered a preferred site for housing development in Lambourn, subject to safeguards. This consideration was under LAM007. Our Client was notified in June 2015, that the preferred site status was proceeding to Council for confirmation in the progress to the EIP stage.</p> <p>Suddenly, in July, 2015, the process was “pulled” and late in October 2015 our Client was notified that LAM007 was rejected in the recommendations for the DPD to be put before the Council on 5 November, 2015. The reason given was conflict with the Council’s Policy (CS12) of protection for the horse racing industry in Lambourn, as the retention of the site in such use is considered important to that industry.</p> <p>On further investigation, our Client discovered that the tenant of Highview had submitted objections in or about September to the allocation, on the need of the site for “turn out”, and that with other objections about horses being on the land, caused the change. Our Client was unaware of these comments, and on 30 October his solicitor wrote to the Council requesting that the Council’s decision be deferred pending an opportunity to consider and reply to what had been said – “the right to reply”. It is also significant that the Council substituted the LAM007 site with a smaller linear development site at LAM015 (now RSA 23), which only entered the process very late in the day and had not gone through the same rigours of assessment that all other Lambourn sites have experienced.</p> <p>The objection was spurious as “turn-out” land though useful, is not essential, and is not necessary in any case to “adjoin” stables. The tenant at Felstead (who is very successful) does not have it, it is not usual in Lambourn, and our Client has expert testimonials to this effect. Furthermore, the land excluded from the submission can still be used for grazing etc.</p> <p><u>The Issues.</u></p> <p>From the consultation documents and the papers before the Council on 5, November, 2015, it is evident that at every appropriate stage, including to the “stalled” recommendation stage in mid 2015, that LAM007 was a preferred site.</p> <p>All the consideration parameters were, subject to safeguards considered positive and the conclusion of the SHLAA was “the site is proposed for a mix of dwellings and densities to suit the needs of the area”. It is significant that horse racing industry and highways concerns had been considered and dismissed in reaching the conclusion.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>48% of respondents to Parish Council questionnaire favoured the site for residential development as their first or second choice.</p> <p>Clearly something happened in the period from mid 2015 to the Council's report in November, 2015, and those events were touched on by the last Inspector but in the absence of any explanation by the Council as to why an acceptable site had been dropped in favour of less favourable one(s) they appeared to us be:</p> <ul style="list-style-type: none"> <li>• 1) Objections from a tenant and others relating to the horse racing industry issue;</li> <li>• 2) The appearance in the document of a brand new site LAM015 in Newbury Road;</li> <li>• 3) Highway comments;</li> <li>• 4) A contention relating to the delivery of the site.</li> </ul> <p>We address each issue in turn.</p> <p><u>1. The Racehorse Industry.</u></p> <p>This issue significantly rests upon the assertions of the tenant and others and ignores the history of the site's previous submissions. Comments had been received by the Council on this subject before June 2015, and the Council had given LAM007 "preferred status".</p> <p>The planning basis for current omission of LAM007 is stated in the papers as Core Strategy Policy CS12. This policy is based on three core objectives :-</p> <ul style="list-style-type: none"> <li>• Retention of suitable establishments/facilities;</li> <li>• Resistance to permanent fragmentation;</li> <li>• Redevelopment away from essential uses to the industry will be subject to suitability and necessity tests.</li> </ul> <p>Fundamental to application of the policy is an understanding of the particular site characteristics and industry practice.</p> <p>Our Client and his wife, through their interests have two yards, one at Felstead Court and the other at Highview in Lambourn. It should be noted that the subject land is not part of any racing establishment and in separate ownership from the adjacent stables of Felstead Court and Highview, which are in Company ownerships, and now let, having previously been operated by the Clients wife (as trainer) and himself until their retirement due to health and age issues.</p> <p>Felstead Court, which is also subject to a tenancy, is larger and has no adjacent land within its agreement (more follows). The tenant of Felstead is very successful – hence</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>the need for further investment in new and improved stables.</p> <p>To the south of site LAM007 is a housing development (Rockfel Road), formerly part of the proposal land, on which our Client obtained residential permission via an appeal in the 1980's. This land was subsequently built out by Westbury in the 90's.</p> <p>To the east of the site, at Stork House stables in 2002 our Client obtained residential permission, and separately, a new stables (i.e. the Highview) permission. Although the permissions are subject to S.106 Agreements, these agreements (relating to open space and jockeys accommodation at Highview) do not bind or enjoin site LAM007 in any way. The residential site was, subsequently, built by Bovis.</p> <p>In addition, to the new Highview Stables, through our Clients' companies, they have invested at the Felstead and Highview sites in a stable lads accommodation unit, a horse walker, and ancillary developments. They are currently planning further stables investments at Felstead, additional lads accommodation units and a new stables. So rather than destroying the race horse industry by seeking residential development, through their Companies, our Clients are one of the few in Lambourn to be heavily investing in it and have been able to do so because of the capital gained from gradual residential development.</p> <p>The subject land LAM007 is not part of the Felstead Court or Highview stables ownership, is not necessary for the stables and is agricultural in use. In short our Client can plough it, or keep any animals for sustenance on it or grow crops on it.</p> <p>Our Client is desirous of exploring the potential for either an alternative combined scheme (residential, stables, and lads units) or an alternative proposal including say, residential frontage development on the Folly Road frontage, with lads accommodation in the south eastern corner accessed off Rockfel Road, new stables at Felstead Court and a totally new stables in the north western corner.</p> <p>The LAM007 land is <u>agricultural</u>, in accordance with the definition in the Town &amp; Country Planning Act 1990. When our Client acquired the land from the Goulandis family trust it had been historically used for the grazing of pedigree cattle for sustenance and until three years ago it was intermittently used from Goulandis times by 3 local farmers for the grazing of sheep. All these animals grazed for sustenance from the land. Racehorses do not graze for sustenance as is explained later. To use land for the keeping of racehorses for commercial purposes is a separate user, which requires planning permission. There has never been a planning permission for such a use on the site, and to benefit from any lawfulness the horse related use would require 10 years of uninterrupted activity – 3 years is insufficient. Legally, there is no</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>application of Policy CS12 to the land.</p> <p>The main facilities required for the training of a racehorse consist of a well ventilated stable, good food, clean hay, bedding and water together with the ability of the trainer to exercise a horse safely on a sound surface as provided by the excellent public training grounds in Lambourn. Other facilities can also include horse exercisers such as walkers and turn out pens like those manufactured by Claydon. The Claydon Turnout Pens, as an example, are designed for restricted and controlled turnout in order to avoid horses galloping when they are shod with metal shoes on all four feet. The crucial factor is horses are at high risk of injury to themselves and to other horses if turned out on large areas, which owners, insurers and the like would not want. Racehorses in licensed training yards are there for the purpose of being trained for the racetrack. They are shod with metal shoes in front and behind in order that they remain sound during their training routine and that they have additional grip and stability in training and racing conditions. Most trainers will have two or three turnout pens up to the recommended 30' in diameter or a small restricted, well rail fenced area, of similar dimensions, if a shod horse needs turning out. It would be negligent to turn such horses out, other than in restricted areas.</p> <p>Horses in training for the racetrack are fed on a high protein specialised diet - they DO NOT get their sustenance from turn out.</p> <p>Our Clients two yards, which adjoin the LAM007 site are training yards and both have turn out pens, separate from the site proposed for housing. There also is an area of land which has been deliberately excluded, and will be kept open and free from any development.</p> <p>In summary on the facts the land is agricultural, does not do away with or fragment any facilities and does not involve any facilities essential to the racehorse industry.</p> <p><u>2) The appearance in the document of a new site LAM015 now RSA 23 in Newbury Road;</u> This is dealt with under our comments on site RSA 23, formerly LAM015 or HSA21.</p> <p><u>3) Highway comments;</u> In all previous considerations of site LAM007 there has not been any highways objection to the development of the site in whole or in part. Our Clients commissioned Highways Consultants to re-examine the situation. Development Transport Planning Ltd concluded, that, "in summary, they do not</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>consider there are any substantive highway reasons for Site LAM007 to be excluded from consideration as a site to be allocated for housing in Lambourn".</i></p> <p><u>4) A contention relating to the delivery of the site.</u> The site is readily available and can be delivered.</p> <p><u>Other matters.</u> Other matters that have been raised by third parties include the following:-</p> <p><u>Amenity</u> There are several opportunities for access from the LAM007 site onto Rockfel Road or on to Folly Road none of which need impact on adjoining houses. The local impact on views due to topography is strictly limited as the Council's Landscape Assessment demonstrates. Any scheme for development can be designed in such a way as to provide a good standard of amenity for proposed properties and to protect the amenities of existing properties.</p> <p><u>Foul Sewers</u> Work has recently been carried out by Thames Water. Increased sewage from this new development can be accommodated.</p> <p><u>Drainage</u> A combination of surface water drainage and SUDs can ensure the site is adequately drained without off site impacts.</p> <p><u>Infrastructure</u> The development will make CIL contributions towards any infrastructure improvements that are required. <u>Lastly in the West Berkshire Housing Site Allocations Development Plan Document - Inspector's Report March 2017 by David Hogger BA MSc MRTPI MCIHT he stated:-</u> <u>"88. Another site in the settlement between Folly Road and Stork House Drive (LAM007 in the SHLAA) displays similar characteristics to the allocated site at Lynch Lane. However, the proposed allocation is sound and there is no justification at this time for allocating further development within the AONB because the limit of 2,000</u></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><u> dwellings, as set out in the CS, would be significantly breached. I note, however, that there is a commitment from the Council to reconsider this site as part of the WBLP preparation”.</u></p> <p>This has not been done and the site has not been included in the Draft Plan.</p> <p><u>Conclusion</u></p> <p>All these matters were raised before Inspector David Hogger in the last Examination and the Council made a commitment to reconsider the site in front of the Inspector. This has not been done.</p> <p>We consider that site LAM007 should be allocated for housing and the settlement boundary altered to include this site. It has previously considered to be a suitable site It is the more logical site of the two considered (RSA 22 and RSA 23) and has been assessed as being sustainable.</p> <p>Unlike the other two it can come forward straight away to be developed. The fundamental principle of the NPPF is the presumption in favour of sustainable development.</p> <p>Elsewhere we have submitted that the housing requirement as a minimum and further sites are required. Therefore in the alternative we consider there is no clear planning reason why additional sites should not allocated for development especially as Lambourn has the services available in the town, which is recognised as a Rural Service Centre in the existing and proposed Development Plan with development potential. This positive preparation would make the Draft Plan sound.</p> <p>Allocation of Site LAM007 would be a positive approach to plan preparation and meeting the objectively assessed needs of the housing market. Allocation of the site would comply with the existing and proposed Development Plan spatial strategy because Lambourn is a Rural Service Centre where additional housing will be provided.</p> <p>The site itself is deliverable and there are no insurmountable items which preclude its development. Its development would subsidise and support the equestrian industry. There are no highways reasons why the site cannot be developed.</p> <p>The site complies with the adopted spatial strategy. It has been found to be a</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>sustainable location for development. The NPPF has at its core a presumption in favour of sustainable development.</p> <p>The inclusion of LAM007 would be consistent with the NPPF and would make the Plan sound and effective.</p> <p>Site LAM007 Land between Folly Road, Rockfel Road and Stork House Drive should be included in/restored to the Plan in Section 8 as a specific RSA Policy.</p>	
Carter Jonas for Mr & Mrs Steljes (lpr2058)	<p><i>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review. This includes the maps referred to in the representation below.</i></p> <p>We object to the Section 8 of the Local Plan as it does not allocate the land at the south of Bradfield Southend for residential development.</p> <p>The land to the south of Bradfield Southend has been promoted previously for a large allocation of 13.7ha and a number of concerns were raised about the scale of the site amongst other matters.</p> <p>In March 2020 a smaller site of 4.2ha was promoted but this was not listed in the December 2020 version of the HELAA. I am advised by the Planning Policy team that this was an oversight. As result of this oversight the smaller site has not assessed for development in the preparation of the Reg 18 Local Plan.</p> <p>The HELAA identifies the larger site at BRAD7 and comments received in respect of highways were that the “site was too large for the Bradfield area and a smaller site could be supported.” The 2014 Landscape Capacity Assessment advised that “the development of the site would result in harm. Development of the site would extend the settlement down the slope into the Bourne Valley” and that “the flood risk was low with the watercourse at the southern end of the site.”</p> <p>When the smaller, more contained site is considered the same problems do not exist. As can be seen from the attached plan the proposed smaller site is only the north east section of BRAD7. The entire site is at no risk of flooding being entirely in flood risk zone 1 (the southern part of the larger site is in flood risk zones 2 and 3).</p> <p>In terms of impact on the landscape, the HELAA suggests that the larger site would have an unacceptable impact on the landscape as it extends south down the Bourne Valley. The reduced site would not extend as far into the Bourne Valley and thus would not have the same impact.</p>	<p>Comments noted.</p> <p>A larger area was assessed in error in the HELAA. The smaller site has been assessed in the updated version of the HELAA, and the assessment of the site concludes that the site is ‘not developable within the next 15 years. This is because development would also extend the settlement down the slope towards the Bourne Valley, and would also fail to respect the traditional linear pattern of development in much of the village</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The scale of development that could be accommodated on the smaller site is in the region of 60-70 dwellings compared to the 128 dwellings which was suggested was the potential for BRAD7. As such the scale would be more in keeping with the scale of Bradfield Southend and thus the impact on the village would be much less, but would nevertheless help sustain local services and facilities and help deliver housing numbers.</p> <p>The site is contiguous with the southern boundary of the settlement and extends no further south into the countryside than the development to the east.</p> <p>The settlement is identified in the Draft Local Plan as a Service Village and it offers a good range of services and facilities including a primary school, pre-school, village shop and post office, pub, village hall, grange, cricket club, and playground. The Local Plan identifies that it is a suitable location for non-strategic allocations for housing and economic development, as demonstrated by the other two allocations in the village.</p> <p>The land is available, and the development of the site can be delivered within the next 5 years. A plan showing the proposed allocation edged in red is attached to this submission.</p> <p>The 4.2ha site on land south of Bradfield Southend to be allocated for residential development of no more than 70 dwellings.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR ref: Chapter 8 - Sites allocated for residential development: Newbury and Thatcham area**

**(Proposed Submission LPR ref: Chapter 8 - Sites allocated for residential development: Newbury and Thatcham area)**

Number of responses received: 3

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
None		
<b>General consultation bodies</b>		
None		
<b>Other stakeholders</b>		
Sir Christopher Gent (lpr2083)	<p>The Council will be aware of previous representations made to the Council in respect of land known as Land to the West of Wantage Road (“Site”). We originally wrote on behalf of our clients in May 2017 and subsequently on 19 February 2020 in response to the Council’s published HELAA which included that Site (Reference SCD2).</p> <p><b>Site Reference SCD2</b></p> <p>Our Clients are pleased to see that the Council has not allocated SCD2 for residential development within the Local Plan. We understand that the reason for the exclusion of the Site is its location outside of the settlement hierarchy, rather than the site “not being developable within the next 15 years”. Our Client’s position remains that the site is not developable not only due to its</p>	<p>Comments noted. The Council does not propose to allocate the site within the proposed submission (Regulation 19) version of the Local Plan Review for the reasons set out at Regulation 18, ie. the site lies within a settlement that falls outside of the settlement hierarchy.</p> <p>The site selection work considers various strands of evidence to determine which sites should progress to the more detailed assessment stage. This takes into consideration the settlement hierarchy, which guides the broad location of new and sustainable development, and takes account of the function and sustainability</p>

Respondent (with lpr ref)	Response	Council Response
	location outside of the settlement area but also its proximity to Donnington Castle and further the existence of various restrictive covenants which our Clients would seek to enforce	of settlements. Sites that fall within settlements / areas outside of the settlement hierarchy have not been subject to any further assessment.
Morwenna McKay (lpr2443)	<p>Croudace Homes ('Croudace') is promoting land at Henwick Park, Thatcham (also known as land west of Heath Lane and north of Bowling Green Road) for inclusion in the Local Plan Review, which could accommodate approximately 225 new homes along with an extensive area of public open space (circa 18 hectares).</p> <p>An appeal for up to 225 homes at Henwick Park was recommended for approval by the Inspector in 2017 but ultimately dismissed by the Secretary of State on the grounds that, although there were no technical reasons for refusal, the Council had a 5-year housing land supply at the time, and it was felt that this site ought to be considered as part of the Council's Local Plan process, not as a standalone planning application.</p> <p>Since that decision, we have been promoting Henwick Park within the framework of the Council's Local Plan Review, and were obviously disappointed that the Emerging Draft, published last month, does not include the site as one of the proposed development sites for Thatcham. You will be aware that the Emerging Draft proposes the overwhelmingly majority of Thatcham's housing needs (approximately 2,500 homes) be delivered on a single, strategic site at North East Thatcham; the only other site proposed at Thatcham - just 85 homes on land at Lower Way - has been allocated already in the Council's 2017 Housing Site Allocations DPD.</p> <p>Whether or not the council ultimately decides to proceed with development at North East Thatcham, we feel there are compelling reasons why Henwick Park should be allocated in the Local Plan Review as an integral part of any growth strategy for Thatcham.</p> <ul style="list-style-type: none"> <li>• <b>Henwick Park would deliver the Thatcham Surface Water Management Plan</b></li> <li>• <b>Henwick Park has already been judged a sustainable location for development</b></li> <li>• <b>Henwick Park is a 'shovel-ready' scheme capable of completion within four years</b></li> </ul>	<p>Comments noted. The Council does not propose to include the site as an allocation.</p> <p><u>Flood alleviation works:</u></p> <p>New flood alleviation measures would be built in to the North East Thatcham allocation. There is a current planning application (as of 11 April 2022) for a basin on the corner of Floral Way and Bath Road, as part of Thatcham's flood alleviation strategy.</p> <p><u>Over reliance on one site / non-allocation of Henwick Park</u></p> <p>Strategic sites in Newbury and Thatcham are expected to deliver housing in the last 10 years of the plan period and beyond while the smaller allocations and existing permissions will deliver throughout the plan period. A trajectory will be prepared to accompany the Reg.19 consultation and will be reviewed annually and reported in the AMR.</p> <p>Development in West Berkshire must consider numerous constraints, most notably the constraints posed by the North Wessex Downs AONB, AWE and the associated DEPZs and flooding.</p> <p>As part of the LPR, all sites promoted to the Council have been assessed in the HELAA and this has concluded that there are sufficient sites to accommodate the Council's housing requirement outside of these constraints.</p> <p>The principles which underpin the spatial distribution of new development stem from the overriding objective of enabling sustainable development, development that will meet the social</p>



Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• <b>Henwick Park would not be a major extension of Thattham into open countryside</b></li> <li>• <b>Thattham needs a number of sites to ensure housing delivery, not just one large site</b></li> </ul> <p><b>Henwick Park would deliver the Thattham Surface Water Management Plan</b></p> <p>The Henwick Park Site is designated within Flood Zone 1 (lowest risk). However, we are very aware that Thattham has suffered from flooding in the past, particularly in 2007, and a Surface Water Management Plan for Thattham has been prepared, designed to avoid a repeat of this flooding. To implement the Thattham Surface Water Management Plan, West Berkshire Council has formulated a drainage scheme that requires the creation of attenuation basins on part of the Henwick Park site, to reduce peak rate downstream water flow into Thattham and reduce the risk of flooding for current residents.</p> <p>At present, delivery of this drainage scheme would depend on the Council securing the necessary funding to purchase this part of the site and build the scheme itself. However, if Henwick Park were allocated for residential development, Croudace would fully fund and build the drainage scheme to the Council's specifications, saving the Council approximately £250,000.</p> <p><b>Henwick Park has already been judged a sustainable location for development</b></p> <p>Having been the subject of a planning application, an appeal and a call-in by the Secretary of State. Henwick Park has already been judged a sustainable location for development of 225 homes. The following quotes are taken from the Secretary of State's letter published in July 2017:</p> <ul style="list-style-type: none"> <li>• <i>"The Secretary of State considers that there is <u>no clear reason to conclude that local services and infrastructure would not be able to accommodate the additional housing.</u></i></li> <li>• <i>"The Secretary of State considers that [Henwick Park] <u>would not be out of keeping with the present character of the area.</u>"</i></li> <li>• <i>"The Secretary of State considers that there is <u>no indication that the development would have a harmful impact on the setting of the Area of Outstanding Natural Beauty.</u>"</i></li> </ul>	<p>and economic needs of the District while respecting the environmental assets of the District and meet the objective to mitigate and adapt to the effects of climate change and minimise demand for energy and other resources.</p> <p>The LPR aims to build on the principles of the Core Strategy with regard to the spatial distribution of development. The focus is on existing settlements, using the settlement hierarchy to steer development to the most sustainable areas, with an appropriate balance between urban and rural development, in order to meet local needs and maintain vibrant and balanced communities with their own sense of identity.</p> <p>The proposed allocation of sites takes account of the evidence from the HELAA and Sustainability Appraisal (SA) and are made in accordance with the settlement hierarchy, with higher levels of development at the higher levels of the hierarchy. Thattham lies in the top tier of the settlement hierarchy (it is an Urban Area). Urban Areas will be the prime focus for housing and economic development.</p> <p>The proposed strategic allocation of North East Thattham is in accordance with the spatial strategy set out in the LPR.</p> <p>It is the Council's preferred approach to allocate site THA20 as a strategic site. Due to the scale of development that could take place on THA20, it is considered that there should be no further allocations in Thattham in the period to 2037 particularly as development of both north east and north Thattham would result in the loss of the separate identifies of Cold Ash and Bucklebury, and would harm the setting of the AONB settlement pattern.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• <i>"The Secretary of State considers that <u>the addition of up to 225 homes in an accessible location would contribute to the Council's housing supply.</u>"</i></li> </ul> <p><b>Henwick Park would not be a major extension of Thatcham into open countryside</b></p> <p>As the enclosed [see attachment on Objective] Design Vision Plan shows, Henwick Park would not extend Thatcham to the north any further than existing development on the opposite side of Cold Ash Hill. A 250-metre buffer would be maintained between Henwick Park and Cold Ash, with any future development to the north prohibited to actively prevent coalescence. We would turn the northern and western part of the site into a 14-hectare country park, providing significant areas of open space for a wide variety of community uses including allotments, orchards, play space and sports facilities. The park would be maintained in perpetuity in order to retain a permanent gap between Thatcham and Cold Ash.</p> <p>Thatcham needs a number of sites to ensure housing delivery, not just one large site</p> <p>Large strategic sites are by their nature complex to deliver, and delays in delivery could result in speculative planning applications on unallocated sites. Before proceeding with a large strategic site such as North East Thatcham, Thatcham needs a broader housing strategy - incorporating several sites, of various sizes - to guarantee sufficient delivery.</p> <p><b>Henwick Park is a 'shovel-ready' scheme, capable of completion within four years</b></p> <p>Henwick Park has the advantage of easy access onto Bowling Green Road, and requires limited new infrastructure. We anticipate that the development could be completed within four years of securing an outline planning consent, making a quick and significant contribution to the Council's housing supply. Croudace is a family-owned housebuilder with over 70 years' experience, and we hold the prestigious Home Builders Federation Customer Satisfaction Survey five-star award, one of only 20 housebuilders nationally to achieve this accolade. If Henwick Park is allocated for development in the Local Plan Review, we fully intend to build out the site ourselves, and can commit to providing:</p>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• <b>The drainage scheme needed to deliver the Thatcham Surface Water Management Plan</b></li> <li>• <b>A 14-hectare country park taking up the northern and western parts of the site</b></li> <li>• <b>90 affordable homes (40%), allocated in accordance with council policy</b></li> <li>• <b>Funding for a bus service through the development</b></li> </ul>	
Washwater Properties Ltd	<p><b>The Chase, Wash Water</b>  In response to the Local Plan Review, covering the period up to 2037, Washwater Properties Ltd would like to submit an application for inclusion in the allocation for development outlined in the Review.  Please find enclosed details of our proposal including a Planning Appraisal, Positional Map, Arial Photos and an Indicative Potential Layout of the site. I trust all of the details contained in these documents will be considered together, as being able to deliver a really good variety of housing. This will provide many new homes suited to modern lifestyles, with them being sympathetically developed within the natural landscape. We believe our proposals can deliver on many of the metrics of interest to the Council. More detailed proposals and explanations can be provided to elaborate our Planning Appraisal. The Indicative Potential Layout is intended as an initial step in the allocation process and, if successful will be developed further in conjunction with your planning department and local councillors.  My family has lived in Wash Common for over 50 years and were previously owners of this land. Such local connections will contribute to a worthy and sympathetic development. we would welcome the opportunity to explain and answer any queries that arise in connection with this matter.</p>	<p>The Council does not proposed to allocate the site. The site is located outside, but adjacent to the settlement boundaries of Newbury and Wash Water. Development of the site would result in the coalescence of the two settlements</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR ref: Chapter 8 Sites allocated for residential development: Eastern Area**

**(Proposed Submission LPR ref: Chapter 8 Sites allocated for residential development: Eastern Area)**

Number of responses received: 1

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
Landowners, site promoters and developers		

Respondent (with lpr ref)	Response	Council Response
Woolf Bond Planning for JPP Land and Spitfire Bespoke Properties (lpr2338)	<p>Our client's interests relate to land located at Brook House Farm, Sulhamstead Road, Burghfield (HELAA ref BUR1).</p> <p>The site has a significant planning history, including two previous applications for the erection of 40 dwellings (24 market houses and 16 affordable units) (LPA Ref. 16/03638/OUTMAJ and 18/03014/OUTMAJ). Some of the information associated with these applications are included in support of these representations.</p> <p>The site extends to a total 2.9ha and is suitable for housing development comprising up to 40 no. dwellings in a sustainable location either as an extension to the settlement of Burghfield Common or alternatively as an extension to the settlement of Burghfield village. This twin approach has been proposed as there is uncertainty as to whether the existing residential development to the south of the site (development off Roman Way) is to be regarded as an integral part of Burghfield Common or forms part of the area between the settlements of Burghfield Common and Burghfield Village.</p> <p>The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period.</p> <p>The following plans are submitted in support of these representations [see attachments], alongside the requisite form:</p> <ul style="list-style-type: none"> <li>• Indicative Site Layout for 40 dwellings (Ref. 2330.10); &amp;</li> <li>• Landscape &amp; Visual Impact Assessment (CSA Environmental).</li> </ul> <p><u>National Planning Policy Framework (NPPF) and the Tests of Soundness</u></p> <p>The NPPF (February 2019) sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified the DPD must be founded upon a proportionate evidence base and represent an appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground.</p>	<p>Comments noted. The site is not proposed for allocation.</p> <p>The site was promoted as part of the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA is one of the evidence documents for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>Within the HELAA the site was assessed as 'not developable within the next 15 years', and as such it was not considered as part of the more detailed site assessment work to determine which sites should be proposed for allocation within the LPR.</p> <p>The site was assessed as such within the HELAA because development would be inappropriate in the context of the existing form, pattern, and character of the landscape. The site is located to the south of Burghfield village. Burghfield comprises of linear development, and on Sulhampstead Road which the site is located, development is situated along the northern side of Sulhampstead Road only. There is some residential to the south of the site off Clayhill Road, and this extends very close to Burghfield Common. Development of the site would therefore result in the coalescence of Burghfield and Burghfield Common. In addition, there are open fields to the east of the site which give the area a rural character and development would have an urbanising effect.</p> <p>Since the HELAA was first published, the Detailed Emergency Planning Zone (DEPZ) around the Atomic Weapons Establishment (AWE) Burghfield was reviewed and amended. The site lies fully within the DEPZ.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The positive preparation test requires plans to as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical.</p> <p>For the reasons set out in these submissions there are a number of potential matters that need to be addressed in future iterations of the emerging Plan. These are outlined following the relevant questions and supporting information within the consultation document.</p> <p><u>The Vision Statement</u> See Council response to 'Our Vision' (representation ref: lpr2316). <u>Assessment of Local Housing Need.</u> See Council response to policy SP12 Approach to Housing Delivery (representation ref: lpr2317). <u>Review of settlement hierarchy</u> See Council response to policy SP3 Settlement Hierarchy (representation ref: lpr2318). <u>Reviewing settlement boundaries</u> See Council response to Appendix 3 Settlement Boundary Review (representation ref: lpr2320).</p> <p><b>What changes are you seeking / what would be your preferred approach?</b></p> <p><u>Further matters - Suitability of land at Brook House Farm, Burghfield Common</u> Through including the established residential area off Roman Way and Saxon Gate within Burghfield Common's settlement boundary results in our clients' land at Brook House Farm being a logical addition to the settlement. Our client's scheme for 40 dwellings is consistent with the scale of schemes which the Council has allocated to the villages through their Housing Site Allocations Local Plan. For the above reasons we are of the strong view that an extension to Burghfield Common should occur and accordingly the subject 2.9ha site, forming land at Brook House Farm should be identified in the emerging plan</p>	<p>The Office for Nuclear Regulation (ONR) has indicated that on the basis of its current model for testing the acceptability of residential developments around the AWE sites, it would advise against nearly all new residential development within the DEPZs.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>as a housing allocation. The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan. Alternatively, it can readily be identified as an extension to Burghfield Village (which as outlined above) could justifiably be re-classified as a Service Village due to the accessibility to services and employment opportunities. It would also be included as an allocation in the Plan. The alternative approaches are consequently outlined below.</p> <p><u>Extension to Burghfield Common</u> As noted above, we propose an amendment to the settlement boundary of Burghfield Common to include our client's site at Brook House Farm together with the adjoining established residential area off Roman Way and Saxon Gate. This forms an accessible and sustainable location for a medium sized residential development opportunity which as outlined above, is consistent with the current strategy. The site is defined and contained by further permitted development on its western side at Brookhouse Farmhouse (12/00484/FULD, 13/01541/FUL and 14/00604/FUL all submitted by Kingfisher First Ltd). Photographs of Saxon Gate as seen from within Saxon Gate our client's site and Saxon Gate - see attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED'. Our client's site is located adjacent to established residential properties to the north of Burghfield Common. It is a naturally well contained parcel surrounded by development of varying forms on all sides. The site itself represents an open pasture of little visual quality. This is confirmed with the submitted Landscape and Visual Impact Assessment. Aerial photograph - see attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED'. As illustrated in the aerial photograph above, our client's site is contained in the wider landscape by not only additional frontage residential development to the north, comprising parts of Burghfield village, but also prominent tree belts associated with a parkland landscape further to the west, mature tree belts to the south west, west and north west. The site is not only well contained by existing forms of development (housing and roads) but is also characterised by its strong visual as well as physical</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>affinity with existing built forms of residential development. These have open aspects onto the site, reinforcing the visual connection between these developments and the site. As a result the site forms a logical well contained parcel of land well related to the existing form and pattern of development that will give little rise to harm to the wider landscape characteristics and appearance of this part of the District. In this context, reference should be made to Section 4 of the Landscape and Visual Impact Assessment (paragraphs 4.1-4.19).</p> <p>It is noted that in the HELAA, the land north of the current Pondhouse Farm allocation/commitment has been promoted for residential development (ref BUR10) together with the land west of the Roman Way development (ref BUR8).</p> <p>Map of HELAA sites in Burghfield - see attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED'.</p> <p>Within the HELAA's assessment, it acknowledges that BUR10 lies adjacent to the existing settlement boundary whereas it suggests this does not apply for our clients land (BUR1) and the land west of Roman Way (BUR8).</p> <p>This assessment however discounts the settlement boundary defined in the existing Development Plan for Burghfield Village which our clients site at Brook House Farm adjoins. Furthermore, as previous noted, the Council's own Core Strategy (Policy CS1) committed the authority to undertaking a review of all settlement boundaries within its Housing Site Allocations Local Plan. Although this occurred with respect of the larger settlements, no review took place for Burghfield Village and other places within the "smaller villages" classification. A review of the settlement boundaries of Burghfield Village and other smaller villages is consequently long overdue. It is therefore essential that this review takes place.</p> <p>Furthermore, the failure of the Council's HELAA to recognise that our clients land at Brook House Farm adjoins a defined settlement boundary (for Burghfield Village) indicates that the overall assessment of the site is unjustified and that the evidence does not support the discounting of the site. As noted, the Roman Way development adjoins the Burghfield Common settlement boundary which was amended following the allocation of Pondhouse Farm in the Site Allocations Local Plan. Having regard to the Council's methodology, this would logically be included within the settlement</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>boundary of Burghfield Common, especially as it is the largest area of residential development not currently within a defined settlement.</p> <p>In reviewing the HELAA assessment of our clients land alongside the others around the Roman Way development, it is clear that they all had recognised development potential (notwithstanding the flawed assessed that our clients land (BUR1) was detached from a settlement boundary).</p> <p>With respect of the Stage 2b “Suitability” assessment, our clients land (BUR1) is unjustifiably rejected due to its contended impact upon the character of the area and the risk of coalescence of settlements. However, as illustrated in the applications for 40 dwellings on the site previously submitted, residential development can readily be accommodated on the site without harm to the wider character. The HELAA does not identify other harms for development of the site.</p> <p>Whilst it is acknowledged that following the Council’s refusal of the two applications, the subsequent appeal [Footnote 2: Appeal ref APP/W0340/W/19/3234882 dismissed on 5th February 2020] was also dismissed but this was within the context of the Development Plan at that time.</p> <p>It is however imperative that the authority review all settlement boundaries and as illustrated in the current Draft Plan, that significant sites outside of settlements like land to the north-east of Thatcham are being advocated for development, the authority should reconsider this.</p> <p>The discounting of the appeal decision on our clients land would also reflect the approach of the authority in recognising the preparation of a new Local Plan means earlier conclusions on a site have been overtaken by events. Although the current Draft Local Plan includes an allocation for 2,500 homes north east of Thatcham (Draft Policy SP17), the suitability of this area was rejected by the Secretary of State on 27th July 2017 in an appeal for up to 495 dwellings on part of the site (PINS ref APP/W0340/W/15/3141449). The Council’s proposed allocation of an area rejected by the Secretary of State on appeal for residential development indicates why the earlier rejection (including on appeal) of the Brookhouse Farm site also needs to be thoroughly reassessed.</p> <p>The NPPF (paragraph 78) is clear of the need to support growth in villages especially where it is sustainable [Footnote 3: The sustainability of the site is</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>acknowledged in paragraph 52 of the appeal decision.]. Development of our clients site would contribute towards this and would also avoid the valued landscpaes within the district [Footnote 4: Site is accepted to not be a valued landscape – paragraph 26 of the appeal decision] (74% within an AONB). There is a clear need to identify further land to ensure that the forthcoming Local Plan both plans for the full 15 years post adoption together with contributing towards the unmeet needs of adjoining authorities, particualrly Reading.</p> <p>Alternatively, the site can be delivered as an extension to Burghfield Village which colud replicate the existing linear form of development along Sulhamstead Road (within the settlement boundary). Whislt such a scheme was not envisaged in the previous applications, there is the opportunity for this within the landholdings available, notwithstanding the views of the Inspector in the earlier appeal (paragraph 18).</p> <p>The assessment of the other sites (BUR8 and BU10) whilst acknowledging the residential development at Roman Way, did not consider the logic of its inclusion within the settlement of Burghfield Common and consequently for there to be settlement extensions to this area. It is therefore not considered that the Council's assessment of our clients land is justified.</p> <p>As our client's land was unjustifiably discounted as Suitable, the HELAA did not assess its availability, achievability or deliverability, notwithstanding the clear evidence of this as outlined in the earlier submissions for the planning application.</p> <p><u>Development considerations</u></p> <p>As discussed above, there is a clear imperative in the revised NPPF to provide housing development in rural locations where a site offers the ability to deliver a sustainable form of development.</p> <p>The Council will recall that an outline application was submitted in 2016 (16/03638/OUTMAJ) with a further application submitted in 2018 (18/03014/OUTMAJ). An appeal was submitted against the Council's refusal of the later decision.</p> <p>The principle elements of these applications as illustrated on the enclosed Site Plan comprise:</p> <ul style="list-style-type: none"> <li>• 40 dwellings.</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• A policy compliant proportion of affordable homes.</li> <li>• An inclusive mix of dwellings.</li> <li>• A character led 2 storey housing scheme of mainly detached and semi-detached houses.</li> <li>• A highway compliant means of access from Clayhill Road.</li> <li>• Retention of mature trees and hedgerows along all site boundaries.</li> <li>• New public open space.</li> <li>• An on-site surface water drainage mitigation that enhances surface water drainage capacities for the wider area.</li> <li>• New, enhanced landscape buffer planting along southern boundary with Saxon Gate and Mundy Close development.</li> <li>• The land take for landscaping/open space is 39%.</li> <li>• Traffic calming scheme along Clayhill Road, enhancing road and pedestrian safety and improvements to the pedestrian route at the junction of Sulhamstead Road, with Clayhill Road.</li> <li>• Development set back from Clayhill Road respecting the building line and the rural setting of the road.</li> <li>• Lower density on north western corner of the site respecting the more rural character of Sulhamstead Road.</li> <li>• A means of access (off Clayhill Road) that avoids access, additional traffic and residential amenity issues in Saxon Gate, an issue with the previous planning application.</li> <li>• Creation of new public open space, opposite existing frontage dwellings on the opposite side of Sulhamstead Road. Avoiding development here preserves existing frontage outlooks and resolves previous amenity issues associated with the earlier planning applications, although this was not a concern raised on the application by Kingfisher First Ltd on the farm house (12/00484/FULD, 13/01541/FUL and 14/00604/FUL).</li> </ul> <p>The information submitted alongside the previous and current planning applications demonstrates why our client's land at Brook House Farm is a deliverable site that will deliver significant benefits for both existing and future residents in the area.</p> <p>Accordingly, the Council should allocate it for a residential led development.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>We note that the site's size comprises 2.9ha and enables a scheme to be brought forward that provides for approximately 40 no. dwellings.</p> <p><u>Master Planning &amp; Landscape Considerations</u></p> <p>A Landscape and Visual Impact Assessment ('LVIA') has been carried out to assess the likely impacts of the proposed development in landscape terms. The LVIA describes the existing landscape character and quality of the site and its visual characteristics. The report then goes on to discuss the development proposals and any potential landscape or visual impacts on the wider area.</p> <p>The site is not subject to any statutory or non-statutory designations for landscape quality, scientific or nature conservation interest and there are no known heritage assets which will be affected by the proposals. The LVIA goes onto conclude (paragraphs 6.2 to 6.5):</p> <p>"Neither the Site nor the immediate landscape is covered by any statutory or non-statutory designations for landscape quality. The Site contains a number of mature landscape features on its boundaries which contribute to the wider landscape character and the adjoining settlement, and the vast majority of them are capable of retention within the development proposals. The Site is assessed as being of medium to low landscape quality, and low landscape sensitivity to the type of residential development being proposed given the proximity of similar development in the immediate vicinity of the Site. The Site is judged as being of medium landscape value due to its lack of designation, public access or heritage assets.</p> <p>The visual assessment found that the Site is well contained by virtue of the well wooded character of the area, the adjoining settlement, and by the undulating topography of the area. There are some partial as well as oblique, near distance views from the properties in the immediate vicinity of the Site, however, views from the adjoining roads of the interior of the Site are, for the most part, screened by the dense boundary hedgerows.</p> <p>The Landscape Strategy Plan shows how an appropriate development can be accommodated at the Site which respects the Site's existing landscape features, and respects the immediate and wider landscape character. The retention of the existing mature landscape framework, and the enhancement of the Site's green infrastructure including tree and thicket planting, as well</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>as the provision of public open space, with community orchard at the north eastern corner, will minimise public views of the new homes and help integrate the development into the wider landscape.</p> <p>For the reasons set out in this assessment, development in accordance with the Landscape Strategy Plan and the principles set out in Section 5, it is considered that the Site can be developed in the manner proposed without giving rise to significant landscape / townscape or visual effects.”</p> <p>The Site Plan has been informed by a thorough landscape appraisal. As a result, the proposed layout provides for a considerable reduction in built form and a significant amount of green infrastructure which helps to assimilate the development into the wider landscape character comprising dwellings interspersed with trees/landscaping.</p> <p>Overall, the LVIA concludes that the scheme provides a comprehensive approach to redevelopment of the site as a logical, modest extension to the village. The localized nature of any visual impacts was acknowledged in the appeal decision (paragraph 53).</p> <p><u>Highway Considerations</u>  Vehicular access to the site is proposed from Clayhill Road with appropriate visibility splays provided. The acceptability of a vehicular access is acknowledged in the Council’s assessment of the site within the HELAA.</p> <p><u>Drainage Considerations</u>  The site is located entirely within flood zone 1 and there will be no adverse impact on floodplain flows or conveyance as a result of the development.</p> <p><u>Ecological Considerations</u>  A suite of ecology surveys have previously been undertaken and confirm that the site is not of high biodiversity value. Subject to appropriate mitigation measures, the proposed scheme is appropriate in ecological respects. This was acknowledged in the appeal decision (paragraph 35).</p> <p><u>Summary</u>  These are substantial benefits of the site which have been identified and accepted by officers of the Council. The detailed analysis and commentary above demonstrate the suitability of the site for allocation within the new Local Plan. Further it is under the control of a local housing developer, who</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>is in a position to bring forward the site for an approximate 40 no. dwellings, parking, open space and landscaping. In addition, the site is deliverable in the immediate five year period and can provide a material number of housing units in a location where the short term need is pressing. Reflecting this assessment of the site and the need for additional housing within the district (to meet its own needs and/or those of adjoining authorities), there are consequently two options for revisions to settlement boundaries that we therefore advocate. These are illustrated on the images below.</p> <p><u>Option 1 -allocation as an extension to Burghfield Common</u></p> <p>For the reasons set out above the site should be allocated within the emerging plan as a housing site allocation for approximately 40 no. dwellings and associated open space. The settlement boundary should therefore be revised as illustrated on the below plan (area bound in red) in future iterations of the Local Plan.</p> <p>Map of the site as an allocation to Burghfield Common - see attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED'. This revision would be consistent with the response detailed above regarding the incorporation of the existing residential development off Roman Way within Burghfield Common, as a direct consequence of the allocation of Pond House Farm through the Council's Site Allocation's Local Plan. We are aware that this site has an extant planning permission for the erection of 100 dwellings and once implemented, this would result in integration of the Roman Way development with the other parts of Burghfield Common.</p> <p><u>Option 2 – Extensions to Burghfield Common and Burghfield Village</u></p> <p>Alternatively, the site could be allocated as sympathetic extension to Burghfield Village with a linear form of residential development (the northern area bound in red). Housing on both sides of the road is already a characteristic feature within the defined settlement of Burghfield and consequently the allocation of Brook House Farm as illustrated below would replicate this. The previous appeal Inspector highlighted a slight dome in the centre of the site. Retaining this topographical feature with a sensitive cluster of residential development well related to Roman Way would create an attractive looking development on this well-contained site (as part of the</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>southern area bound in red).</p> <p>Map of the site as an allocation to Burghfield Common - see attachment 'W Berks Local Plan reps February 2021 Burghfield Common REDACTED'.</p> <p><u>Conclusion</u></p> <p>For the reasons set out above, the Local Plan could risk failing the NPPF tests of soundness for the following reasons:</p> <ul style="list-style-type: none"> <li>• Negatively Prepared – If it does not plan for appropriate housing delivery having regard to minimum needs within West Berkshire District or the wider needs occurring in neighbouring authorities. Further if it fails to allocate a sufficient amount of housing land to meet pressing needs early on in the plan period.</li> <li>• Unjustified – If the proposed housing distribution strategy fails to acknowledge the continued suitability of Burghfield Common or Burghfield Village as an appropriate location for housing growth and identifies inappropriate potential housing sites when considered against the reasonable alternative of a housing allocation at Brook House Farm.</li> <li>• Ineffective – If the plan fails to propose an appropriate housing distribution strategy or introduce sufficient flexibility into the developable supply over the plan period.</li> </ul> <p>Inconsistent with the National Policy – If the plan fails to allocate an appropriate amount of housing land or in the right location, having particular regard to the need for housing in rural locations as emphasized in the revised NPPF</p>	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA1 The Kennet Centre, Newbury**

Number of responses received: 14

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr765)	<p>Support for policy.</p> <p>Mention needs to be made of archaeological potential; despite the redevelopment of the 1970s below ground deposits may survive within the Kennet Centre that could tell us more about Newbury's origins. A programme of assessment will be required.</p>	<p>Support for allocation noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1.</p> <p>The site was originally promoted as part of the 'call for sites' for the Housing and Economic Land Availability Assessment (HELAA) in 2017. The promoter at the time indicated that there was potential to accommodate residential and/or a hotel to complement the existing uses on the site.</p> <p>The Level 1 Strategic Flood Risk Assessment (SFRA) indicated that 40% of the site was within Flood Zone 1 (low risk of flooding), with 60% within Flood Zone 2 (medium risk of flooding). The Site Selection Background Paper for the emerging draft (Regulation 18) Local Plan Review (LPR) therefore advised that any residential development should be located within the southern area of the site which falls within Flood Zone 1.</p> <p>Since the Regulation 18 consultation on the LPR, the site has changed ownership and alternative proposals have been put forward by the promoter. These proposals seek a comprehensive redevelopment with residential uses spread across much of the site.</p>



Respondent (with lpr ref)	Response	Council Response
		<p>The National Planning Policy Framework states at paragraph 159 that “<i>inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).</i>” It goes on to state at paragraph 161 that “<i>all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.</i>”</p> <p>There are other more sequentially preferable sites (ie. which are at a low risk of flooding) that are suitable for allocation.</p> <p>It is however recognised that the site is brownfield, within a sustainable location, and presents a significant opportunity for redevelopment.</p>
<b>Statutory consultees</b>		
Historic England (lpr1567)	<p>There is currently no conservation area appraisal for Newbury town centre. Given the scale of the proposed development (250 dwellings), ideally, a conservation area appraisal should be carried out to evidence that this scale of development would be appropriate here and to help inform the design approach of the development. As a minimum, a heritage impact assessment should be carried out prior to allocation, in order to ensure an appropriate level of development is allocated in the plan. Without such evidence to inform the plan-making stage, there is a risk that the plan could allocate too much or too little development on the site.</p> <p>In terms of detailed policy criteria for archaeology, we would recommend that the Council be guided by advice from the West Berkshire Archaeology Service. As a minimum, we would expect a desk-based analysis, and subject to the results of the DBA, field evaluation.</p>	<p>Comments noted.</p> <p>A Conservation Area Appraisal for Newbury Town Centre is currently in preparation.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council’s response to representation lpr765.</p>
Natural England (lpr1611)	<p>This allocation is extremely close to the River Kennet SSSI, at 35-40m at the closest point. Extreme care will have to be taken at the planning stage to ensure no impact from construction on the river.</p>	<p>Comments noted.</p>

Respondent (with lpr ref)	Response	Council Response
		The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.
Newbury Town Council (lpr2250)	We strongly support this site but have some reservations about the heights of some buildings proposed in the draft Master Plan. We note that currently there is no housing within the site, which is 100% town centre uses. We support the proposed mix of uses, the use of ground source heat pumps and the degree of vitality that should come with a large residential component.	Support for allocation noted.  The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.
Shaw-Cum-Donnington Parish Council (lpr218)	No comment	Noted.
Savills (UK) Ltd for Thames Water (lpr1774)	<p><b>Water response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste Response:</b></p>	Comments noted.  The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.

Respondent (with lpr ref)	Response	Council Response
	<p>The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	
<b>General consultation bodies</b>		
Heritage Forum (lpr85)	<p>Support for allocation.</p> <p>We agree that the design and scale of the Kennet Centre development should complement existing buildings and the Newbury Conservation Area.</p>	<p>Support for policy noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p>
Newbury Society (lpr1150)	<p>We think that the proposed development sites need to be handled with sensitivity, with the views of existing residents taken into account. In relation to Newbury, we are in favour of flats being built above the Kennet Centre, but would need to see designs before we can assess appropriate numbers. We are not yet convinced that the centre can comfortably take 250, let alone the 400 currently proposed by a developer. We think that development approval should be conditional on spending a significant part of</p>	<p>Comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p>

Respondent (with lpr ref)	Response	Council Response
	the financial return from the flats on revitalising the ground floor premises, whether for shops or other uses. This could be an opportunity to improve the appearance of this part of Newbury.	
<b>Other stakeholders</b>		
Keith Hoddinott (lpr1995)	<p>The recent application for the redevelopment of the Kennet Centre, concerns were expressed at the height of the buildings. I would suggest that no new construction roof line should be higher than one floor below the iconic Town Hall clock tower.</p> <p>What is to be the future of the Bayer complex, which has significant underground parking? There were rumours of locating all public organisations (Council, police, citizens advice etc) here.</p>	<p>Comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p> <p>Bayer House in Newbury town centre has prior approval for 191 residential apartments.</p>
Susan Millington (lpr470)	This part of town is very susceptible to flooding. I am concerned that further high rise buildings on this site, with the requirement for deep foundations, will affect the drainage of this whole area.	<p>Comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p>
Ian Parsons (lpr832)	<p>Support for allocation.</p> <p>Housing in town centres, especially where the provision suits first time buyers and young families is to be welcomed.</p> <p>Also, it would be great if the council were able to prevent housing being bought by private landlords and then rented out.</p>	<p>Support for allocation and comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p> <p>It is recognised that the site is brownfield, within a sustainable location, and presents a significant opportunity</p>

Respondent (with lpr ref)	Response	Council Response
		for redevelopment. It is therefore proposed amend policy SP1 Spatial Strategy to reflect this.
Clive Tombs (lpr134)	<p>Support for allocation.</p> <p>The area identified under policy RSA1 appears to offer the potential to deliver residential development in a sustainable location in the heart of Newbury, that affords easy access to transport links including cycle routes, train and bus stations, as well as offering the potential to help sustain existing shops and local services.</p> <p>Any re-development of the Kennet Centre needs to avoid being overbearing and creating a canyon effect on Market Street when considered with the Weavers Yard development on the opposite side of the road.</p> <p>Provision could also usefully be made, within the proposed Eagle Quarter redevelopment, for a covered market (similar to Oxford's) as a distinctive feature to attract people to Newbury, encourage new stalls, and as a means to hold the charter market under cover especially during bad weather.</p>	<p>Support for allocation and comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p> <p>It is recognised that the site is brownfield, within a sustainable location, and presents a significant opportunity for redevelopment. It is therefore proposed amend policy SP1 Spatial Strategy to reflect this.</p>
Councillor Tony Vickers (lpr562)	<p>Support for allocation.</p> <p>We welcome the zero carbon commitment of this developer as well as the high number of new dwellings it will deliver in a town centre location to enhance the town's vitality.</p>	<p>Support for allocation and comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.</p> <p>It is recognised that the site is brownfield, within a sustainable location, and presents a significant opportunity for redevelopment. It is therefore proposed amend policy SP1 Spatial Strategy to reflect this.</p>
<b>Landowners, site promoters and developers</b>		
Lochailort Newbury Ltd (lpr2037)	<p><b>Context</b></p> <p>Following its heyday, the Kennet Centre entered a period of gradual but sustained decline, affected by a number of factors including:</p>	<p>Comments noted.</p> <p>The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• In 2011 a competing shopping centre opened on the opposite side of the town centre at Parkway, which saw one of the Kennet Centre’s two anchor stores (Debenhams) relocate to the new centre and footfall drawn away from the Kennet Centre. The 300,000sqft Parkway centre has 48 shops and 550 car parking spaces – but following the recent closure of its two anchor stores (Debenhams and John Lewis) is now struggling with the demise of High Street retail.</li> <li>• The other of the Kennet Centre’s two anchor stores (Sainsburys) moved to new premises at Hector’s Way in 1995, which were extended in 1999 and then doubled in size in 2013 to a total of 86,000sqft net sales area (140,000sqft total area) with 529 free parking spaces.</li> <li>• Newbury Retail Park had opened at Pinchington Lane in 1997 and was extended in 2006 to a total of 180,000sqft across 14 stores and 4 restaurants. The retail park is well over a mile south of the town centre and has 770 free car parking spaces – almost double that of the Kennet Centre multi-storey pay &amp; display car park. The adjacent Tesco store, originally opened in 1988, was itself extended in 2003 a total of 91,000sqft net sales area (99,000sqft total area) with 645 free parking spaces.</li> <li>• During this period, Vodafone moved from several offices in the town centre to a new world headquarters campus on a Green Belt site two miles north of the town centre. When the 575,000sqft facility opened in 2001 (with its 2,457 car parking spaces) 4,500 Vodafone staff relocated out of the town centre to the new out-of-town office campus.</li> </ul> <p>These locally-specific factors occurred at a time when UK retailing was itself going through a significant structural transition towards online retailing. Online sales went from virtually zero in 1998 to 17.8% of all UK retail spend in 2018, having a well-documented adverse effect on UK High Streets.</p> <p><b>Imminent planning application</b></p>	<p>already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council’s response to representation lpr765.</p> <p>It is recognised that the site is brownfield, within a sustainable location, and presents a significant opportunity for redevelopment. It is therefore proposed amend policy SP1 Spatial Strategy to reflect this.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Following our purchase of the Kennet Centre in January 2020, we have assembled an extensive professional team and have consulted widely on our proposals to comprehensively redevelop the centre. A detailed full planning application is being finalised and will be submitted this month, proposing:</p> <p><i>“Full: Phased redevelopment of the Kennet Centre comprising (i) partial demolition of existing building (ii) flexible-use commercial space (iii) headquarters office building (iv) 400 dwellings plus residents’ ancillary facilities (v) access, car parking and cycle parking (vi) landscaping &amp; open space (vii) sustainable energy installations (viii) associated works”</i></p> <p>Our commercial property advisors have been clear that there is significant risk in constructing a new headquarters office building without an occupier prelet being in place, and therefore in order to provide flexibility in the development mix and to avoid delays in the scheme’s delivery, a second “Scheme B” application is also being submitted which replaces the office element of there development with a 91-unit retirement living scheme.</p> <p>Our masterplan has been subject to several rounds of preapplication consultation with the Local Authority, the Town Council, technical consultees, interested parties and the general public. There has been widespread support for both the principle of redevelopment and for the mix of uses proposed.</p> <p><b>National planning policy context</b></p> <p>We have already identified exceptionally strong policy support for our proposed comprehensive redevelopment within the National Planning Policy Framework, Planning Practice Guidance, and the numerous ministerial and Prime Ministerial announcements and speeches on the importance of revitalising our town centres. It is trite to repeat those policy imperatives here, but suffice to say there is unequivocal national policy support for increased residential, employment and leisure spaces in highly sustainable town centre locations such as the Kennet Centre.</p> <p>It is within the context of the above background that we make the following representations.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><b>Draft Policy RSA1 The Kennet Centre, Newbury (Site Ref: NEW3)</b>            We support the identification of the Kennet Centre as a site in need of regeneration.            We support the explicit recognition that this is a highly sustainable location.            We also support the flexible wording of the policy in referring to a mix of uses rather than setting out any use mix requirement or restriction.            However, we also request the following policy changes to align the emerging site-specific allocation with our comprehensive redevelopment masterplan that has already been subject to extensive consultation:</p> <ol style="list-style-type: none"> <li>1. <u>Quantum of residential development</u>              The iterative masterplanning process that we have undertaken over the past months has confirmed that, as part of a mix of uses, this highly-sustainable location could accommodate 400 dwellings. The reference to “<i>approximately 250 dwellings</i>” in the draft policy should be increased to “<i>approximately 400 dwellings, or approximately 500 dwellings should C2 uses form part of the redevelopment.</i>”</li> <li>2. <u>Existing uses</u>              It would be difficult to extend or redevelop the Kennet Centre in its current form from an engineering and energy performance perspective and to that end, whilst we intend to retain the existing multi-storey car park and the 2009-built cinema wing, the rest of the centre (built in phases from the 1970s onwards) will be demolished in its entirety. The policy wording should be amended to read “<i>The residential aspect would complement any retained and/or additional non-residential uses on the site.</i>”</li> <li>3. <u>Development density</u>              The Kennet Centre occupies a significant parcel of land in West Berkshire’s largest town centre. It benefits from excellent sustainable transport links by virtue of its location mid-way between the railway station and bus station. It has a level of accessibility to services, facilities and employment opportunities that no other brownfield site in the District can equal. Its comprehensive redevelopment offers an unparalleled opportunity to revitalise and regenerate this part of the town centre.</li> </ol>	



Respondent (with lpr ref)	Response	Council Response
	<p>Consequently, the site’s unique sustainability credentials, together with its scale, mean that redevelopment here should be maximised to make the most efficient use of the site and thus minimise the quantum of development needed on greenfield land elsewhere. The opportunity for sustainable energy installations is also maximised with higher density schemes. This means that an appropriate development density should be informed by proper masterplanning and contextual analysis, rather than being led or constrained by the more generalised approach adopted in the West Berkshire Density Pattern Book. Accordingly, the policy wording should be amended to read <i>“The site occupies a highly sustainable location and presents an opportunity for a substantially higher density than estimated using the West Berkshire Density Pattern Book.”</i></p> <p>4. <u>Appraisal criteria</u> We support the “town centre first” strategy and the sequential approach within it. We also support the presumption in favour of sustainable development and that the redevelopment of previously-developed land within defined settlement boundaries will be acceptable in principle. To ensure consistency with the above changes to draft Policy RSA1, draft Policy SP1 should be amended to read <i>“Other developments will include redevelopment of previously developed land, including a substantial element of residential use as part of a town centre mixed use development at the Kennet Centre (Policy RSA1).”</i></p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: RSA2 Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)

### (Proposed Submission LPR Policy: RSA1 Land north of Newbury College, Monks Lane, Newbury)

Number of responses received: 5

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Newbury Town Council (lpr2247)	These sites (RSA2, 4 and 6) all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.	Comments noted. Development has not yet commenced on the site. The allocation will therefore continue to be included in the LPR.
Shaw-Cum-Donnington Parish Council (lpr219)	We question whether it is wise provide housing here rather than reserve it for the future extension to the college.	Comments noted. The land has been promoted by Newbury College.
Historic England (lpr1568)	We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted.
Savills (UK) Ltd for Thames Water (lpr1744)	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Comments noted. A phase 1 and phase 2 water cycle study has now been prepared and will be reflected in the policy as follows - <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u>

Respondent (with lpr ref)	Response	Council Response
		These comments will inform the emerging draft Infrastructure Delivery Plan.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr563)	This site has full planning consent. It is likely to be complete before the new Local Plan is adopted.	Comments noted. Development has not yet commenced. The site will therefore continue to be included in the LPR.

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: RSA3 Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)

### (Proposed Submission LPR Policy: RSA2 Land at Bath Road, Speen, Newbury)

Number of responses received: 5

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Thatcham Town Council (lpr1408)	We make some observations where principles of environmental protection set a principle that must be applied equality to policy SP 17. Policy RSA 3: We note that this non-strategic site places emphasis on noise and air quality surveys, environmental protection such as habitat protection for wildlife, limitation of built form to avoid development on the skyline, tree planted landscapes and tree belts, and that rights-of-way across the site will be protected. We would expect that a strategic, rural, countryside site would also at least the same environmental protection. This policy establishes a principle of protection that should apply equally to policy SP 17. It is necessary to include the same principles to SP 17 including noise and air quality surveys and environmental protection.	Comments noted.  These comments relate to Policy SP17 and no changes to this policy are required in light of this representation. Please see the Council's response to comments on Policy SP17.
Historic England (lpr1569)	We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comment noted.
<b>General consultation bodies</b>		
Mid and West Berkshire Local	MWBLAF warmly welcomes the statement in this policy that: The rural character of the existing Public Rights of Way across the site will be protected.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
Access Forum (lpr1866)	The Forum believes that this should apply to all sites in this Local Plan that are crossed by or adjacent to public rights of way.	The Local Plan policies seek to protect and enhance public rights of way.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr566)	Policy is supported. This site has had full planning consent for a year. The allocation should remain in the Plan in case the developer fails to complete it early.	Comments noted. As development has not yet commenced, the site will continue to be included in the LPR.
<b>Landowners, site promoters and developers</b>		
Pro Vision on behalf of Sir Richard Sutton Limited (lpr1271)	<p>Policy is supported.</p> <p>Sir Richard Sutton Ltd (SRSL) own all of the land comprised in the RSA3 Allocation (with the exception of a small section of the former railway line which serves to maintain an existing footpath link between the two development parcels only). SRSL fully supports the proposed allocation and confirm that it is deliverable; that is, it is available now, is in a suitable location and development is achievable within the next 5 years.</p> <p>SRSL supports draft policy RSA3 because it allocates housing on the edge of the Newbury urban area, which will be the focus for most new development, recognising that additional allocations are required to meet the need for additional housing in the area.</p> <p>The SA/SEA that supported the site's previous allocation in the HSADPD noted that "There are no significant sustainability issues with this site. The site is easily accessible by public transport, walking and cycling and with close proximity to open countryside and local sports facilities to help promote a healthy active lifestyle all of which will have a positive impact on sustainability". There have been no material changes to the local area since the HSADPD was adopted. The Local Plan Review (LPR) SA/SEA confirms that the site is in a sustainable location, close to a wide range of services.</p> <p>The RSA3 site is not subject to any significant constraints that might limit or delay development in the manner proposed. The site is capable of being readily accessed and serviced. Indeed, the site benefits from outline planning permission (OPP). The site is therefore capable of early delivery; an important consideration given the current Housing Land Supply position in the area.</p>	Comments noted.

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR Policy: RSA4 Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)**

**(Proposed Submission LPR Policy: RSA3 Land at Coley Farm, Stoney Lane, Newbury)**

Number of responses received: 9

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Newbury Town Council (lpr2248)	These sites (RSA2, 4 and 6) all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.	Comments noted. No changes to the policy are required in light of this representation.
Thatcham Town Council (lpr1409)	<i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i> We make some observations where principles of environmental protection set a principle that must be applied equality to policy SP 17. Policy RSA 4: We note that a distinct reference is given to a flood risk assessment for flood risk downstream. This policy establishes a principle of protection that should apply equally to policy SP 17. It is necessary to include the same principles to SP 17.	Comments noted. No changes to the policy are required in light of this representation. Please see the Council's response to comments on policy SP17.
Thames Water Utilities Ltd (lpr1743)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of	Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows - <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for</u>

Respondent (with lpr ref)	Response	Council Response
	<p>the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p> <p>Groundwater: The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <p>Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3) (SITE ALLOCATED PENDING) The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development</p>	<p><u>water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

Respondent (with lpr ref)	Response	Council Response
	does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website. On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	
<b>General consultation bodies</b>		
Mid & West Berks Local Access Forum (lpr1867)	<p>MWBLAF supports the statement within the policy: This site will be delivered in accordance with the following parameters:</p> <ul style="list-style-type: none"> <li>• Comprises a development design and layout that includes the following measures:</li> <li>• Provides cycle and footpath connections into existing routes and beyond into the open countryside.</li> </ul> <p>However, there do not appear to be any existing connections from this site to the open countryside, and particularly to the nearby public footpaths. The Forum would welcome clarification on what is intended.</p>	Comments noted. No changes to the policy are required in light of this representation. The proposed footpath connections for this site are detailed in the documents accompanying the planning application for this site (reference 20/00604/FULEXT). Footpath and cycle connections are also included in the emerging draft Infrastructure Delivery Plan.
<b>Other stakeholders</b>		
Name withheld (lpr1465)	I believe the site for 75 proposed houses at Coley Park is also not suitable for the large development proposed for many of the same reasons as the above [see lpr1464]. Additionally, I cannot believe that this site is planned considering the dreadful access along Stoney Lane, both from South & North. This road is a narrow country lane which makes travelling it very dangerous at certain points. What is to stop the new residents of this development turning right out of the site to travel North & joining the Cold Ash road at the Ridge/Ashmore Green crossroads in order to access the M4 at Chieveley? Negotiating this crossroads in itself is a very difficult prospect in rush hour. Stoney Lane going North is totally unsuitable for any volume of traffic at all. Access from the south would involve ripping out hedgerows/trees in order to widen the road & provide pedestrian access by footpath. This area is also a haven for wildlife.	Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained. The site has planning permission. The site will therefore continue to be included in the plan and no further amendments need to be made in light of this representation.
Paula Sanderson (lpr971)	Hasn't this already been agreed, if so this revised plan is already out of date?	Comments noted. No changes to the policy are required in light of this representation.



Respondent (with lpr ref)	Response	Council Response
		Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained. The site has planning permission. As development has not yet commenced, the site will continue to be included in the LPR.
Councillor Tony Vickers (lpr568)	We opposed this allocation but it now has full planning consent. The developer wants to start soon. However should this not happen, we would welcome planning consent lapsing.	Comments noted. No changes to the policy are required in light of this representation.
<b>Landowners, site promoters and developers</b>		
Solve Planning Ltd for West Development Partnership (lpr1426)	Policies SP13 and RSA4 identify a site at Stoney Lane for the delivery of up to 75 dwellings. This site is well placed on the edge of Newbury but, alongside an additional site has the potential to deliver more dwellings on the edge of the main settlement of Newbury. Previous representations have been made relating to the additional site to the north and this has the potential to increase further the level of housing delivery from this site. Changes to be made/preferred approach: Extension of allocation HSA3 to increase the extent of the allocation. See additional information that accompanies this submission.	Comments noted. No changes to the policy are required in light of this representation. These comments relate to the HELAA site CA8 (Land off Stoney Lane, Stone Copse, Newbury). The HELAA has assessed that site CA8 is 'not developable within the next 15 years'.
Southern Planning Practice Ltd on behalf of The Saunders Family (lpr1931)	The land to the south west of the site, land at Coley Farm, is allocated for the development of 75 dwellings in the Local Plan Review. The site is also currently allocated in the adopted Local Plan under policy HSA3. An online planning history search has revealed that outline planning permission for 75 dwellings was permitted in May 2016 and an application for full planning permission was submitted in March 2020. This application was presented at the November 2020 committee and was recommended for approval by Officers, however the minutes of the committee meeting were not published at the time of writing.	Comments noted. No changes to the policy are required in light of this representation. Comments are made in relation to HELAA site CA9 (Land north of Waller Drive (West of Yate's Copse) Newbury). The HELAA recommended that site CA9 is potentially developable in part. Full details on why the site was not taken forward as an allocation are set out in the Site Selection Paper.

Respondent (with lpr ref)	Response	Council Response
	<p>We note that the site layout plan for the 2020 application provides opportunities for links to the land east of Stoney Lane. There are two obvious access points to the site, one to the north and one to east.</p> <p>In light of the approval on land at Coley Farm and links that is provides to the land east of Stoney Lane, it is considered that the land east of Stoney provides a logical extension to the previous allocation and is clearly located in an area which the Council considers appropriate for the development of new homes.</p> <p>Conclusion: Paragraph 15 of the NPPF makes it clear that plans should be prepared in a way that is aspirational but deliverable.</p> <p>It is considered that as currently drafted, the emerging local plan is not positively prepared and is unlikely to assist the Government in its objective to significant boost the supply of new homes as it carries forward previous allocations which have failed to deliver and proposes new allocations which also may not deliver new homes or take a long time to provide new homes, when the need is now.</p> <p>To remedy this deficiency, it is considered that the council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply. In this respect, we would point out the suitability of the land east of Stoney Lane.</p> <p>In accordance with the definition of 'deliverable' within the National Planning Policy Framework (2019), the site is available for development now, it is a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.</p> <p>The opportunities and constraints plan demonstrates how the site could be delivered to provide a landscape-led residential development. The plan details the potential development area together with open space, links to green infrastructure together with links to the wider area.</p> <p>In conclusion, as demonstrated throughout these representations, the land east of Stoney Lane is available, suitable and achievable and would make a positive contribution to help meet West Berkshire's housing need, in particular the housing need for Newbury. The site could also potentially contribute to meeting unmet need arising from Reading Borough.</p>	

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR Policy: RSA5 Land adjoining New Road, Newbury (Site Ref: GRE6)

Number of responses received: 7

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
BBOWT (lpr988)	BBOWT believe that it would be difficult to develop this site without significant impact on the ancient woodland, particularly when considered in combination with the amount of recent development within close proximity. The site provides a semi-natural buffer which would be hard to retain in sufficient quantity in any development proposals. There would also be increased recreational pressures from new residents.	Comments noted. Drainage officers comment that development of the site would lead to a reduction in groundwater level affecting the hydrology of the site to the detriment of the Ancient Woodland. A stream runs through the eastern part of the site. Development should be kept away Planning application 18/01148/OUTD for four dwellings, roads, ancillary structures, and landscaping, with access to New Road was refused on 19 <sup>th</sup> July 2018. Aside from the reason of the site being located outside of the settlement boundary, the second reason for refusal focused on the resulting pressure on the Ancient Woodland, with the canopies of the trees around the site coming under undue pressure from the occupiers of the dwellings. Given that the site is proposed to be allocated for approximately 10 dwellings, and with the updated advice, it is considered

Respondent (with lpr ref)	Response	Council Response
		<p>that the pressure on the Ancient Woodland would be too great to progress with the site as a housing site. The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p>
Natural England (lpr1610)	<p><b>Policies RSA5, RSA6</b> These allocations are directly adjacent to an area of ancient woodland, and their development will reduce connectivity between the woodland and other areas of green infrastructure. Please refer to Natural England's standing advice (<a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort</a>) on ancient woodland to avoid significant impact. Planning decisions should be made in line with para. 175 (c) of the NPPF.</p>	<p>Comments noted. The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the</p>

Respondent (with lpr ref)	Response	Council Response
		ancient woodland would be so great that the site is not suitable for development.
Thames Water Utilities (lpr1771)	<p><i>See attachments on Objective for full response to the Local Plan Review.</i></p> <p><b>Water response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste response</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Comments noted.</p> <p>The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’, and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p>
Thatcham Town Council (lpr1410)	<p><i>Full representation relating to North East Thatcham strategic site allocation attached to representation on SP17 (lpr1401).</i></p> <p><b>Policy RSA 5</b> We note the specific reference given to protection of Ancient Woodland and buffer.</p> <p>This policy establishes a principle of protection that should apply equally to policy SP 17.</p>	<p>Comments noted. Please see response to SP17.</p> <p>The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that ‘development</p>

Respondent (with lpr ref)	Response	Council Response
	It is necessary to include the same principles to SP 17.	resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.
<b>General consultation bodies</b>		
Mid & West Berks Local Access Forum (lpr1868)	<p>Public footpath GREE/13/1 crosses the southern boundary of this site and bridleway GREE/3/1 is adjacent to the Eastern Boundary.</p> <p>MWBLAF is disappointed that there is no mention of these in the policy.</p> <p>The Forum recommends the following addition to the policy to address public rights of way:</p> <p>Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements that will cover amongst others a buffer between the developable area and the ancient woodland that is situated to the west of the site, <b><u>protection of the character of the public rights of way</u></b>, and access.</p>	<p>Comments noted. Had the site progressed to allocation in the submission document detailed criteria would be drawn up relating to site-specific matters, including public rights of way.</p> <p>The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p>
<b>Other stakeholders</b>		

Respondent (with lpr ref)	Response	Council Response
Councillor Tony Vickers (lpr570)	<p>We oppose this allocation. It has ancient woodland on two sides and a planning application for a mere 4 dwellings was refused in 2018, so how can it be expected to deliver 10?</p> <p>Remove from the Plan</p>	<p>Comments noted.</p> <p>The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p>
<b>Landowners, site promoters and developers</b>		
Pro Vision for Rivar Ltd (lpr1634)	<p>We have previously submitted this site to the Council as part of the 'Call for Sites (CfS)' exercise and is identified in the Council's Housing and Economic Land Availability Assessment (HELAA) as site ref: GRE6. The HELAA concludes that the site is 'potentially deliverable in part'.</p> <p><u>Background</u></p> <p>Policy SP 13 of the Consultation Document identifies 'Land adjoining New Road, Newbury' as a preferred site allocation for approximately 10 dwellings. Whilst the site is identified as a 'large site (1 ha or over)', given its context the developable area of the site is for a small-scale development. A site-specific Policy is included at Policy RSA 5 of the Consultation Document and confirms that "detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements that will cover amongst others a buffer between the developable area and the ancient woodland that is situated to the west of the site, and access".</p>	<p>Support for policy noted.</p> <p>The allocation will now be removed from the LPR, due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the NPPF which states at paragraph 180 c) that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists', and further to the refused planning application for</p>

Respondent (with lpr ref)	Response	Council Response
	<p><u>Housing Requirement and Supply</u> The Council needs to ensure that there is sufficient flexibility in the Local Plan with regards to the overall housing strategy. The National Planning Policy Framework ('the Framework') acknowledges at paragraph 68 that small and medium sized sites '<i>can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly</i>'. Accordingly, the Local Plan should identify a range of sites of various sizes – from small scale to large scale developments - to provide extra resilience and flexibility to the Local Plan. With this in mind, we welcome the proposed allocation of our client's land for a small-scale development of around 10 dwellings at Newbury which will provide choice and contingency to the market.</p> <p><u>Land adjoining New Road, Newbury</u> We agree with the Council's conclusions in the HELAA and the Site Selection Background Paper (December 2020) that the site is suitable for allocation for development of approximately 10 dwellings. It is considered that developing the 'Land adjoining New Road, Newbury' is a developable option for the following reasons:</p> <ul style="list-style-type: none"> <li>(a) There is a need to identify small/medium scale sites for housing in West Berkshire to meet the indicative housing requirements during the plan period.</li> <li>(b) The site is located in the 'Newbury and Thatcham Area' which is capable of accommodating significant levels of growth given the range of services and facilities it currently offers and is therefore a sustainable location for development.</li> <li>(c) The land has a strong relationship with the existing residential development to the north and follows the existing pattern of the settlement.</li> <li>(d) The site is visually well contained by existing woodland and trees which affords a degree of separation from the wider landscape.</li> <li>(e) An appropriate buffer (i.e. 15 metres) can be maintained to the Ancient Woodland.</li> </ul>	<p>four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>(f) The site is not subject to any specific environmental or statutory designations such as Green Belt, Special Protection Area (SPA), Area of Outstanding Natural Beauty (AONB) or Site of Special Scientific Interest (SSSI).</p> <p>(g) The site is located in Flood Zone 1 (i.e. low probability of flooding) and a sustainable drainage system would be provided.</p> <p>(h) The site has access to local employment opportunities within Newbury, Greenham and beyond;</p> <p>(i) The site is in close proximity to local bus routes, and within walking distances of key facilities and services available. Future residents would therefore benefit from these existing services.</p> <p>(j) A vehicular access and appropriate visibility splays can be delivered from New Road;</p> <p>(k) The scale of dwellings proposed (i.e. around 10 new homes) is capable of delivering housing in line with local objectives, such as need for affordable housing.</p> <p>(l) Further opportunity to deliver new areas of green infrastructure and the creation of areas of green amenity/open space for recreation, ecological and biodiversity enhancements.</p> <p>(m) The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.</p> <p>(n) The site is available for a residential development immediately. The land is within single landownership and Rivar have an option to purchase the site which will facilitate its timely development early in the plan period.</p> <p>(o) Furthermore, as far as we are aware, there are no legal problems which would prevent this site coming forward for residential development.</p> <p>Accordingly, it is considered that there are no identifiable constraints that would prevent the delivery of the site for a small-scale residential development. The site is therefore suitable, available, and achievable for around 10 new homes, in a timely and sustainable manner.</p>	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA6 Land off Greenham Road and New Road, South East Newbury (Site Ref: HSA 4)****(Proposed Submission LPR Policy: RSA4 Land off Greenham Road, Newbury)**

Number of responses received: 5

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Newbury Town Council (lpr2249)	These sites (RSA2, 4 and 6) all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.	Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. It is acknowledged that two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy will be amended accordingly.
Natural England (lpr1609)	These allocations [RSA5 and RSA6] are directly adjacent to an area of ancient woodland, and their development will reduce connectivity between the woodland and other areas of green infrastructure. Please refer to Natural England's standing advice ( <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort</a> ) on ancient woodland to avoid significant impact. Planning decisions should be made in line with para. 175 (c) of the NPPF.	Comments noted. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy will be amended accordingly.

Respondent (with lpr ref)	Response	Council Response
		These comments will also inform the emerging draft Infrastructure Delivery Plan. The emerging draft IDP already includes costings for developer contributions towards woodland in relation to the site. The policy wording referring to buffers between the development and ancient woodland will be strengthened.
Thames Water (lpr1772)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -  <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>General consultation bodies</b>		
Mid and West Berkshire Local	Public footpath GREE/13/1 passes through the northern part of this site. However, this part of the site is already built, at least in part. Any further	Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The

Respondent (with lpr ref)	Response	Council Response
Access Forum (lpr1869)	<p>development of this part of the site is likely to obstruct the right of way, or at least substantially change its character.</p> <p>MWBLAF therefore requests clarification on whether any further development is planned for this part of the site.</p>	<p>site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. It is acknowledged that two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy will be amended accordingly. These comments will also inform the emerging draft Infrastructure Delivery Plan. The emerging draft IDP already includes costings for developer contributions towards footpaths in relation to RSA6.</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr572)	<p>Policy is supported.</p> <p>This allocation has full planning consent and one site is nearly complete.</p>	<p>Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. It is acknowledged that two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy will be amended accordingly.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: RSA7 Land at Lower Way, Thatcham (Site Ref: HSA 5)

### (Proposed Submission LPR Policy: RSA5 Land at Lower Way, Thatcham)

Number of responses received: 7

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Environment Agency (lpr1667)	There should be no adverse impacts on the protected sites to the south: Thatcham Reed Beds SSSI; River Kennet SSSI; Kennet and Lambourn Floodplain Special Area of Conservation (SAC). Without this wording strengthening the allocation, the local plan could be found unsound in the future.	<p>Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained. The site has planning permission.</p> <p>The policy will be amended to address these comments as follows –  ‘Development will be informed by an <u>appropriate Ecological Impact Assessment (EclA) extended phase 1 habitat survey together with further detailed surveys arising from that as necessary</u>. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any <u>designated sites and/or</u> protected habitats and/or species are not adversely affected <u>This includes any adverse impact on the Thatcham Reed Beds SSSI, River Kennet SSSI and Kennet and Lambourn Floodplain SAC. Opportunities to improve biodiversity and green</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>connectivity alongside the nearby Long Lake Marsh Local Wildlife Site should be considered.</u>'</p> <p>These comments will also inform the emerging draft Infrastructure Delivery Plan. The emerging draft IDP already includes costings for developer contributions towards biodiversity in relation to the allocation.</p>
Historic England (lpr1570)	We support the requirement for proposals to be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted. No further amendments need to be made in light of this representation.
Natural England (lpr1608)	<p>This allocation has the potential to cause adverse impact on the Kennet and Lambourn Floodplain SAC and Thatcham Reedbeds SSSI, if mitigation isn't implemented at planning application stage.</p> <p>There is also significant opportunity here to improve biodiversity and green connectivity at this site, with the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust alongside the nearby Long Lake Marsh Local Wildlife Site. Any future planning application should explore these opportunities to contribute to a biodiversity net gain.</p>	<p>Comments noted. This policy rolls forward allocations from the former Housing Site Allocations DPD which have not yet been completed but remain available and deliverable. This site has planning permission. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p> <p>The policy will be amended to address these comments as follows –</p> <p>'Development will be informed by an <u>appropriate Ecological Impact Assessment (EclA)</u> <del>extended phase 1 habitat survey together with further detailed surveys arising from that as necessary.</del> Appropriate avoidance and mitigation measures will need to be implemented, to ensure any <u>designated sites and/or</u> protected habitats and/or species are not adversely affected. <u>This includes any adverse impact on the Thatcham Reed Beds SSSI, River Kennet SSSI and Kennet and Lambourn Floodplain SAC. Opportunities to improve biodiversity and green</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>connectivity alongside the nearby Long Lake Marsh Local Wildlife Site should be considered.</u>'</p> <p>These comments will also inform the emerging draft Infrastructure Delivery Plan. The emerging draft IDP already includes costings for developer contributions towards biodiversity in relation to the allocation.</p>
Thames Water (lpr1773)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website.</p> <p>The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website.</p>	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p> <p><u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
Mid and West Berkshire Local Access Forum (lpr1870)	<p>MWBLAF supports the statements:</p> <ul style="list-style-type: none"> <li>• Pedestrian and cycle linkages will be expected through the site and linking to the surrounding area.</li> <li>• It is expected that development will ... be set back from the existing public rights of way to the east and west of the site.</li> </ul> <p>The Forum notes that a new public footpath runs along the southern boundary of the site and then crosses the site to join Lower Way close to its junction to Paynesdown Road. This new public right of way does not appear to be addressed in the policy. We suggest that this route could be enhanced and extended as a traffic-free cycle route along the southern boundary to the entrance to the Discovery Centre, and also possibly extended eastwards beyond the site to The Moors. This would provide a continuous traffic-free cycle route from The Moors estate towards Newbury.</p> <p>The Forum recommends the following addition to item iv):            (iv) It is expected that development will front onto Lower Way to enable effective integration with the existing built form and be set back from the existing public rights of way <b>within or adjacent to to the east, and west of the site, which should be retained as distinct routes, <u>separate from the roads within the development.</u></b></p>	<p>Comments noted. The policy will be amended to address these comments as follows –            'It is expected that development will front onto Lower Way to enable effective integration with the existing built form and be set back from the existing public rights of way <u>within or adjacent to the east and west of the site, which should be retained as distinct routes separate from the roads within the development.</u>'</p> <p>These comments will also inform the emerging draft Infrastructure Delivery Plan. The emerging draft IDP already includes costings for developer contributions towards footpaths in relation to the allocation.</p>
<b>Other stakeholders</b>		
Nataliya Topliss (lpr811)	<p>The site will be accessed via Lower Way that leads to the A4. The A4 is of full capacity with excessive congestion daily (when there is no lockdown). West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted. No further changes are required in light of this representation. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained. The site has planning permission.</p>
Councillor Tony Vickers (lpr574)	<p>Policy is supported.            This site has full planning consent.</p>	<p>Comments noted.</p>



## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: RSA8 Land at Poplar Farm, Cold Ash (Site Ref: HSA 6)

Number of responses received: 4

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Thames Water (lpr1748)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>This response is provided assuming that discharge will be via gravity and that no surface water will be discharged to the wastewater network.</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>The National Planning Policy Framework (NPPF) at paragraph 122 states that:  <i>“Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan...they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)...”</i></p> <p>Further to this, Planning Practice Guidance (PPG) (para 019, ref ID: 3-019-20190722) states that a site can be considered available if there is confidence that there are no legal or ownership impediments to development. It also states that the existence of planning permission can be a good indication of availability, as can the delivery record of landowners / developers.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>In terms of achievability, the PPG (para 020, ref ID: 3-020-20190722) states that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.</p> <p>In the nearly 5 years since the HSA DPD was adopted there has been no progress on bringing the site forward. The site does not have planning permission and no planning applications have ever been submitted. In light of this, the fact that no one landowner has overall control of the site, and the issues around financial viability, officers consider that it is not possible to demonstrate that the site is still available, achievable, and deliverable.</p> <p>The allocation will be removed from the LPR due to concerns over deliverability.</p>
Historic England (lpr1571)	<p>We support the requirement for a heritage impact assessment to assess the impact of development on the Grade II listed Poplar Farmhouse and its setting and to inform development on the site and for development to ensure the conservation and enhancement of the Farmhouse and its setting.</p>	<p>Comments noted.</p> <p>It is proposed that the allocation be removed due to concerns over deliverability. (see response to Thames Water above)</p>
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1871)	<p>MWBLAF welcomes the recognition in this policy of the effect of developments on the appearance of the landscape from viewpoints. The Forum therefore supports the following statement:</p> <p>The scheme ... will include: ... The provision of woodland blocks in the north western corner and along the southern edge to mitigate effects on views from the public rights of way to the north west and to the south.</p> <p>The Forum recommends that the Council considers including a similar statement in other policies where development would have a similar effect on views.</p>	<p>Comments noted.</p> <p>The allocation will be removed from the LPR due to concerns over deliverability. (see response to Thames Water above)</p>

Respondent (with lpr ref)	Response	Council Response
<b>Other stakeholders</b>		
Name withheld (lpr1464)	<p>Policy not supported.</p> <p>My main area of comment is in regards to any further housing development in Cold Ash as that is where I live &amp; that is therefore my foremost area of interest but having said that I do have general comments to make about potential proposed housing sites across the West Berkshire area.</p> <p>Firstly, I have concerns about the proposed site at Poplar farm Cold Ash. Although some of this site is currently taken up by farm buildings/farmyards, which incidentally I would not like to see go, a chunk of it is greenfield land currently used for grazing of one sort or another. This land is notoriously wet &amp; I fear that any building on this site would increase the chances of flooding to the houses just a little further down the hill.</p> <p>Also the proposed access points are both a contentious point. The first access point would use the current lane leading into the farm which is directly opposite the very dangerous &amp; much overused junction with Collaroy Road. In normal circumstances, when schools are fully attended &amp; we are not in a lockdown situation, this junction is exceedingly busy with numerous cars using Collaroy Road as a rat run to St Finians school. The junction comes out onto Cold Ash hill which is also extremely busy at several times during the day &amp; where traffic is usually going far in excess of the 30mph limit in place through Cold Ash. In fact I have seen traffic actually overtaking on the approach to Collaroy Road on several occasions &amp; that is no exaggeration ...ask anyone who lives along this stretch of road. There have been serious accidents at this junction previously. A crossroads there would increase the risk to traffic emerging from the junctions &amp; traffic travelling on the hill itself. The Collaroy junction also has bad visibility when exiting as does the current farm lane.</p> <p>The second proposed access appears from the plan to go across the middle of the existing paddock below Orchard End. As mentioned previously this paddock is extremely wet at times &amp; so building a road across it may increase potential flooding issues for the housing below. There is also the more obvious problem that if a road is built through that field, planners will see that as a golden opportunity to "infill" with further housing between Orchard End &amp; the first house South of the paddock. Any further loss of greenfield sites in Cold Ash would be terrible for the village, the wildlife</p>	<p>Comments noted.</p> <p>The site specific policy for this site (Policy RSA8) takes account of the flood risk on the site and seeks the delivery of a detention pond on the southern part of the site to accommodate development drainage. The policy also requires that any scheme is informed by a Flood Risk Assessment which will include the provision of safe flow routes and appropriate flood mitigation measures, including SuDS, as it is recognised the site and adjacent properties are susceptible to surface water flooding.</p> <p>The policy sets out options for the access points to the site, and requires an upgrade, as necessary, to the existing access should this be retained. Any development on the site would need to ensure adequate access is provided through a planning application.</p> <p>Policy SP23 of the LPR sets out the planning policy approach for infrastructure requirements and delivery. Developer contributions are sought on most new development within the District. These contributions are sought in order to provide for additional facilities and infrastructure demands as a result of new development.</p> <p>The allocation will be removed from the LPR due to concerns over deliverability. (see response to Thames Water above)</p>

Respondent (with lpr ref)	Response	Council Response
	<p>population, biodiversity &amp; indeed, the loss in this case of good old fashioned meadow grazing currently used for horses, pigs, donkeys &amp; geese. The loss of some beautiful views &amp; landscapes I am sure would also be of great concern to all those who live in this area of Cold Ash as well as myself. We live in a much sort after &amp; beautiful village which is in danger of becoming just another urban sprawl.</p> <p>The increase in housing in the village is also a concern with regards to general infrastructure. The doctors surgeries in Thatcham are full to bursting point with very long waits to access appointments at the best of times. St Marks school is full to breaking point &amp; I believe under no circumstances should any attempt be made to build a replacement in the village as that would also have to take up more valuable greenfield land. The local bus service is almost non existent &amp; cycling to Thatcham on Cold Ash hill is a very dangerous prospect indeed these days. Thatcham is also a considerable distance to walk if you are carrying heavy shopping or are in the older age bracket. Of course, further housing also increases the traffic on the already overused rat run of Cold Ash hill.</p> <p>From a wider prospective, I totally understand the need for some additional housing in the West Berkshire area but I do believe that new housing should be concentrated on brown field sites, on sites which do not suffer from flooding already or where building would cause flooding from drain off, &amp; should not take place except on very exceptional circumstances on our very precious greenfield land which is home to British wildlife flora &amp; birdlife, which once built on can never be replaced. I also believe that in order for housing to be built the correct infrastructure should be in place beforehand &amp; consideration should be taken to the increase in traffic &amp; the nightmare which ensues for the existing residents of those areas.</p> <p>Please consider my views when taking the local plan forward into its next stages.</p>	

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR Policy: RSA9 St Gabriel's Farm, The Ridge, Cold Ash (Site Ref: HSA 7)

Number of responses received: 3

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Thames Water (lpr1749)	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (16/02529/OUTD) was granted in October 2017 and Reserved Matters permission (19/00832/REM) in January 2021.</p> <p>The allocation will now be removed from the LPR as the site has planning permission and development is under construction.</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr941)	<p>We strongly objected to this allocation but it now has full planning consent. Remove from Plan as it is likely to be built before Plan adoption.</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (16/02529/OUTD) was granted in October 2017 and Reserved Matters permission (19/00832/REM) in January 2021.</p> <p>The allocation will now be removed from the LPR as the site has planning permission and development is under construction.</p>

Respondent (with lpr ref)	Response	Council Response
<b>Landowners, site promoters and developers</b>		
Pro Vision on behalf of TA Fisher and Sons Ltd (lpr1933)	<p>Our client supports the proposed allocation of the site and is keen to continue working collaboratively with the Council to secure its sustainable development. These representations therefore focus on responding to / clarifying specific elements in the wording of Policy RSA9 to ensure that it is clear and factually accurate.</p> <p>Table 9.1 of the Council's Site Selection Background Paper (December 2020) provides the Council's deliverability update.</p> <p>The only comments that we have in relation to the Council's deliverability update is to confirm that, as noted above, Reserved Matters consent has now been granted (at appeal).</p> <p>Regarding Policy RSA9 of the draft Local Plan, our only comments relate to ensuring that its wording reflects the details of the site / development for which Outline planning permission and Reserved Matters consent was granted (ref. 16/02529/OUTD and 19/00832/REM). This relates to the following:</p> <p>Part ii) refers to individual accesses being provided from The Ridge in keeping with the local pattern. However, the approved development shows three access points to serve the five new dwellings. Therefore, while one dwelling has an individual access, the remaining four dwellings share two access points. We therefore respectfully request the following amendment if the remaining wording is deemed necessary:  <del>"(ii) Individual accesses</del> <u>Access will be provided from The Ridge in keeping with the local pattern."</u></p> <p>Part ii) refers to individual accesses being provided from The Ridge in keeping with the local pattern. However, the approved development shows three access points to serve the five new dwellings. Therefore, while one dwelling has an individual access, the remaining four dwellings share two access points. We therefore respectfully request reference to individual access points is deleted.</p> <p>Part (iii) (bullet 3) refers to the retention of the front boundary hedgerow treatment. However, the approved development shows the removal of some hedgerow to allow access to the new dwellings. We therefore respectfully request the following amendment:</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (16/02529/OUTD) was granted in October 2017 and Reserved Matters permission (19/00832/REM) in January 2021.</p> <p>The allocation will now be removed from the LPR as the site has planning permission and development is under construction.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p><i>“The retention of the front boundary hedgerow treatment <u>where possible, with the exception of that required for access and visibility splays.</u>”</i></p> <p>Part (iii) (bullet 3) refers to the retention of the front boundary hedgerow treatment. However, the approved development shows the removal of some hedgerow to allow access to the new dwellings. We therefore respectfully request the wording is adjusted to reflect that it will be necessary to remove some boundary hedge to facilitate the points of access.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: RSA10 Stoneham’s Farm, Long Lane, Tilehurst (Site Ref: HSA9)

### (Proposed Submission LPR Policy: RSA6 Stoneham’s Farm, Long Lane, Tilehurst)

Number of responses received: 4

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Thames Water (lpr1750)	<p>The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p> <p>Water: Not enough information provided to form a valid view of expected demand from this development.</p>	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p> <p><u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u></p>
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1872)	<p>MWBLAF notes that the public footpath to the south west of this site (TILE/6/2) forms part of a Berkshire Circular Route. It is therefore an important public right of way, whose character should be protected. The Forum therefore strongly supports the following statement in the policy: The site will be developed in accordance with the Landscape Capacity Assessment (2014) and will include: The retention of boundary hedgerows and trees along Long Lane and the Berkshire Circular Route.</p>	<p>Comments noted.</p>



Respondent <i>(with lpr ref)</i>	Response	Council Response
<b>Other stakeholders</b>		
Ian Parsons (lpr833)	Policy is supported. Traffic will increase now in Sulham and Tidmarsh - and ways of mitigating the effects of this are worth exploring.	Comments noted. No further changes are required in light of this representation.
Councillor Tony Vickers (lpr964)	Policy is supported.	Support noted.

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA11 Stoneham’s Farm, Tilehurst - Site B (Site Ref: HSA 10)**

Number of responses received: 4

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Historic England (lpr1572)	We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted. The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Outline planning permission (16/01223/OUTMAJ) was granted in December 2016 and Reserved Matters permission (19/00718/RESMAJ) in June 2019. The allocation will now be removed from the LPR as the site has planning permission and development is under construction.
Thames Water (lpr1751)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website.	Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared. The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Outline planning permission (16/01223/OUTMAJ) was granted in December 2016 and Reserved Matters permission (19/00718/RESMAJ) in June 2019. The allocation will now be removed from the LPR as the site has planning permission and development is under construction.

Respondent (with lpr ref)	Response	Council Response
	On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.	
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1873)	<p>Contrary to what is stated, the path to the north of this site does not form part of a Berkshire Circular Route. For part of its length, it is adjacent to the site, but for another part it is within the boundary of the site – as shown on the map in the draft Local Plan.</p> <p>MWBLAF therefore supports the references in the policy to public rights of way, but suggests that they are clarified, to refer to the public right of way that is both within and adjacent to the boundary of this part of the site.</p> <p>The Forum recommends the following changes to the policy: The site will be developed in accordance with the Landscape Capacity Assessment (2014) and will include: <i>Tree planting along Long Lane and the edge of Stonehams Farm, the retention of the trees and boundary hedgerows along Long Lane <del>and Berkshire Circular Route</del> and the provision of a new tree belt and hedgerow along the northern exposed boundary, to preserve the character of the public footpath.</i></p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (16/01223/OUTMAJ) was granted in December 2016 and Reserved Matters permission (19/00718/RESMAJ) in June 2019.</p> <p>The allocation is now proposed to be removed from the LPR as the site has planning permission and development is under construction.</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr963)	Policy is supported.	<p>Support noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (16/01223/OUTMAJ) was granted in December 2016 and Reserved Matters permission (19/00718/RESMAJ) in June 2019.</p> <p>The allocation is now proposed to be removed from the LPR as the site has planning permission and development is under construction.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA12 72 Purley Rise, Purley on Thames (Site Ref: HSA 11)****(Proposed Submission LPR Policy: RSA7 72 Purley Rise, Purley on Thames)**

Number of responses received: 5

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Purley on Thames Parish Council (lpr1853)	<p>Purley on Thames Parish Council is generally supportive of the proposals to meet the requirements for housing development by location and type taking account of the AONB locations. Specific comments relating to Purley on Thames are as follows:</p> <ul style="list-style-type: none"> <li>We are satisfied with the approved plans for 72 Purley Rise included in Section 8 as it provides a green buffer between the Housing and existing open land together with the inclusion of a Public Open Space.</li> <li>As there is very little potential for development within Purley on Thames we do have concerns over attempts to apply for planning permission in the woodland adjoining the A329 which forms the green corridor either side of the A329 through the village.</li> </ul>	Comments noted. No further amendments need to be made in light of this representation. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. As development has not yet been built out, the allocation is being retained.
Historic England (lpr1573)	We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted. No further amendments need to be made in light of this representation.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr962)	Policy is supported.	Support noted.

Respondent (with lpr ref)	Response	Council Response
<b>Landowners, site promoters and developers</b>		
John Phillips Planning Consultancy on behalf of Mr Henry Venners (lpr1166)	<p>Despite the development area where housing is suggested being previously developed land and not within any sensitive area nor near any heritage interests the allocation seeks to provide an excessive amount of open space around the site. Considering all the sites allocated for housing within the plan - many of which are within the AONB - very much smaller areas are suggested as being needed for 'open space' proportionally to the area to be developed</p> <p>The suggested land take is excessive, but this can be addressed (see box below)</p> <p><b>Criterion (wording of)</b> 'The open northern part will be retained as undeveloped open space' to be deleted and replaced with 'residential buildings shall be confined to the blue highlighted area'</p> <p>Or 'landscaping, fields, and/or open space shall be provided on the northern part of the site as shown hatched'</p> <p>Land adjacent the railway cannot be planted with trees and there is no reason why farm use cannot continue there. Fields need not be defined as 'open space'. Other peripheral areas not needed for tree planting nor public open space should be able to be retained as field and the policy make that clear. It would not be appropriate for members of the public to be encouraged next to the railway for safety reason nor for trees etc to be planted inappropriately.</p> <p>This area is also required for access to other farm fields and access should be considered an acceptable use.</p> <p>Drainage infrastructure is 'development' yet would be acceptably located within the suggested open space areas. It is inappropriate to use the term undeveloped when types of 'development' such as drainage infrastructure, landscaping, and change of use are acceptable forms of development within the 'non-housing area'. The clumsy and therefore the unhelpful language employed should be changed- avoid the word development which means a different thing in planning legislation to what was meant- which actually means buildings.</p>	<p>Comments noted.</p> <p>The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan and reflects the site as promoted through the HELAA. As a large part of the site is not considered appropriate for development this is reflected in the amount of the site allocated as required landscape buffer.</p> <p>As part of the LPR, and in the interests of clarity, the Council now intends to adjust the boundary of the allocated site to remove the landscape buffer. The site allocated in the LPR will therefore encompass the current developable area of the site only.</p> <p>Amend the policy as follows –</p> <p><del>The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.</del></p> <p>The site will be developed in accordance with the Landscape Capacity Assessment (2015) and will include: ...</p> <ul style="list-style-type: none"> <li>• <del>The open northern part will be retained as undeveloped open space.</del></li> <li>• <del>The tree cover on the site and around the boundaries will to be retained.</del></li> <li>• <del>Open space and Green Infrastructure will be provided to conserve and enhance the setting of the AONB and the landscape character of the settlement edge.</del></li> </ul>

Respondent (with lpr ref)	Response	Council Response
Boyer Planning on behalf of Shanly Homes (lpr1976)	<p>Policy is supported. Some wording changes are suggested given that the site has outline permission with some assessments already submitted. Shanly Homes are currently preparing Reserved Matters applications which will undertake assessments in relation to Flood Risk Assessment and a Phase 1 Habitat Survey in order to demonstrate the site is suitable to accommodate new development. The site is a proposed allocation for up to 35 residential units with an element of self-build homes. Policy RSA 12 provides an indicate map of developable area of approximately 1 hectare. The outline permission is consistent with the developable area illustrated within the LPR as it makes an appropriate balance between making efficient use of land and protecting the surrounding landscape. The Policy states that the site will be developed in accordance with a Landscape Visual Impact Assessment (LVIA). The outline permission was informed by a LVIA that has taken into account the Landscape Capacity Assessment (2015) which would ensure the site has capacity to accommodate the proposed development whilst ensuring the densities and the mass and scale of development would reflect the adjacent settlement character and be designed to avoid increasing the visual prominence of development on the edge of Purley. The LVIA concluded that the overall balance of landscape effects accommodating demolition, clearance and construction, with extensive landscape measures is assessed to lead to a minor/moderate local impact significance, with the balance of works leading to a neutral effect in year 1. The assessment concludes that the landscape measures will lead to a moderate positive local landscape effect at year 10 and will result in a positive landscape enhancement thereafter. Given that a detailed LVIA has been undertaken for the site already, it is recommended that the wording of section (vii) is changed to read “The scheme will be informed by the findings of a full detailed Landscape Visual Impact Assessment (LVIA)”.</p> <p>Policy RSA 12 states that the scheme will be supported by a Flood Risk Assessment, a Phase 1 Habitat Survey and an Archaeological Desk Based Assessment.</p>	<p>Comments noted.</p> <p>The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan and reflects the site as promoted through the HELAA. As a large part of the site is not considered appropriate for development this is reflected in the amount of the site allocated as required landscape buffer. As part of the LPR, and in the interests of clarity, the Council intends to adjust the boundary of the allocated site to remove the landscape buffer. The site allocated in the LPR will therefore encompass the current developable area of the site only.</p> <p>Amend the policy as follows –</p> <p><del>The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.</del></p> <p>The site will be developed in accordance with the Landscape Capacity Assessment (2015) and will include: ...</p> <ul style="list-style-type: none"> <li><del>• The open northern part will be retained as undeveloped open space.</del></li> <li><del>• The tree cover on the site and around the boundaries will to be retained.</del></li> <li><del>• Open space and Green Infrastructure will be provided to conserve and enhance the setting of the AONB and the landscape character of the settlement edge.</del></li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>As part of the outline permission the Council's Archaeological Officer reviewed the application using the approach set down in the NPPF and concluded that there would be no major impact on any features of archaeological significance. The Archaeological Officer made reference to the desk-based assessment and field evaluation reports which supported the pre-application stage of the application and concluded that no archaeological assessment or programme of investigation and recording is necessary for the proposed development.</p> <p>It is therefore suggested that reference to the Archaeological Desk Based Assessment is removed from Policy RSA 12. For clarity this would remove section (v) from Policy RSA 12.</p> <p>Shanly Homes are currently preparing Reserved Matters applications which will undertake these assessments in relation to Flood Risk Assessment and a Phase 1 Habitat Survey in order to demonstrate the site is suitable to accommodate new development.</p> <p><b>Conclusion</b></p> <p>Shanly Homes is seeking to promote 72 Purley Rise, Purley on Thames housing allocation. We welcome West Berkshire Local Plan Review (2037) Regulation 18 Consultation and proposed allocation of 72 Purley Rise to accommodate new development. The site is owned by Shanly Homes, who are a willing developer committed to bringing this land and the reserved matters forward. Shanly Homes look forward to working with West Berkshire Council on the reserved matters applications.</p> <p>The proposed 29 dwellings is an appropriate balance between making efficient use of land and protecting the surrounding landscape while also providing 34% affordable housing and providing an element of self-build homes.</p> <p>On the basis of the above, the land is deliverable for housing development in the context of existing and emerging national planning policy contained within the NPPF.</p> <p>Given that a detailed LVIA has been undertaken for the site already, it is recommended that the wording of section (vii) is changed to read "The scheme will be informed by the findings of a full detailed Landscape Visual Impact Assessment (LVIA)".</p>	

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	Suggested that reference to the Archaeological Desk Based Assessment is removed from Policy RSA 12. For clarity this would remove section (v) from Policy RSA 12.	



## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: RSA13 Land adjacent to Junction 12 of M4, Bath Road, Calcot (Site Ref HSA12)

Number of responses received: 4

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Historic England (lpr1574)	<p><i>See attachments on Objective for full response to the Local Plan Review.</i></p> <p>We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Full planning permission (19/01544/FULEXT) was granted in February 2020. The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>
Savills (UK) Ltd for Thames Water (lpr1752)	<p><i>See attachments on Objective for full response to the Local Plan Review.</i></p> <p><b>Water response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Full planning permission (19/01544/FULEXT) was granted in February 2020. The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste Response:</b> The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p> <p><b>Additional comments:</b> None</p>	
<b>General consultation bodies</b>		
Mid & West Berks Local Access Forum (lpr1874)	<p>MWBLAF welcomes and supports the statements within these policies to:</p> <p>Provide footpath and cycle linkages to RSA13, connecting into the wider footpath and cycleway network.</p> <p>And</p> <p>The site ... will be delivered in accordance with the following parameters: with additional pedestrian access provided which links into existing</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Full planning permission (19/01544/FULEXT) was granted in February 2020. The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>

Respondent (with lpr ref)	Response	Council Response
	pedestrian and cycle links and the proposed residential development at RSA12.	
<b>Other stakeholders</b>		
Councillor Tony Vickers	<p>This would appear to potentially almost close the 'green gap' between Tilehurst / Holybrook and Theale, as well as expose its future residents to high levels of noise and air pollution.</p> <p>We feel the number allocated to this site ought to be at or below the minimum (150) to keep housing away from A4 and M4 and give more GI on site.</p> <p>We welcome the prospect of improved connectivity off road between Holybrook linear park and the Hypermarket through the site.</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Full planning permission (19/01544/FULEXT) was granted in February 2020. The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>
<b>Landowners, site promoters and developers</b>		
None		

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR Policy: RSA14 Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref: HSA 13)**

**(Proposed Submission LPR Policy: RSA8 Land adjacent to Bath Road and Dorking Way, Calcot)**

Number of responses received: 3

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Thames Water (lpr1746)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>WASTE - There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer.</p>	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows</p> <p><u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

Respondent (with lpr ref)	Response	Council Response
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1875)	MWBLAF welcomes and supports the statements within these policies to: Provide footpath and cycle linkages to RSA13, connecting into the wider footpath and cycleway network. And The site ... will be delivered in accordance with the following parameters: with additional pedestrian access provided which links into existing pedestrian and cycle links and the proposed residential development at RSA12.	Comments noted. No changes are required to this policy in light of this representation.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr973)	Policy is supported.	Comments noted. No changes are required to this policy in light of this representation.

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR Policy: RSA15 Land between A340 and The Green, Theale (Site Ref: HSA 14)

#### (Proposed Submission LPR Policy: RSA9 Land between A340 and The Green, Theale)

Number of responses received: 5

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Historic England (lpr1575)	We support the requirements for a landscape buffer and retention of the grade II listed milestone.	Comments noted.  The policy will be amended to make clear that the landscape buffer will be retained outside the settlement boundary for Theale.
Thames Water (lpr1753)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> .	Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -  <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u>  These comments will inform the emerging draft Infrastructure Delivery Plan.

Respondent (with lpr ref)	Response	Council Response
	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p>	
<b>Other stakeholders</b>		
Melanie Paul (lpr1371)	<p>West Berkshire's own policy C1 outlines that the council are opposed to developing the countryside. Yet all the areas identified in the plans in and around Theale are part of a small area of countryside that we have left as you have persisted in your unrelenting drive to destroy the village. The areas identified are home for wildlife of many types, including for example; Deer, Roebuck, Foxes, Owls and Pheasant. We can't keep blindly pushing animals out, this is selfish and only represents West Berkshire Council's support for human greed and the belief that humans own this world and every other being is irrelevant. This has to stop, animals need a habitat to live in too.</p> <p>The well-being of the people that live in the village have had no consideration in the planning. Theale residents have had enough of West Berkshire Council's need to dump all the development at this end of the County. There is plenty of space to choose from at the Newbury end. Please stop your land grabbing in and around the area near the M4, it's impacting the wellbeing of the residents you are supposed to represent.</p> <p>Covid-19 has demonstrated that packing people into closely built housing estates only fuels the spread. West Berkshire's cases have been lower because of the open areas. This needs to be considered for future as there is no doubt there will be more exposure to pandemics if we continue to ignore the need for green space and less compacted settlement areas.</p> <p>The areas in question act as natural borders around Theale, protecting us from the noise of the M4 &amp; A4.</p>	<p>Comments noted.</p> <p>No further changes to the policy are required in light of this representation because this site already has planning permission. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>We don't need more commercial buildings, Arlington Business Park and the Arrowhead Road area has plenty of un-used space on the other other side of the A4. By building on the Village side, you only increase traffic volumes in the village and cause more noise and air pollution.</p> <p>The volume of traffic in Theale, and the area of Junction 12 of the M4 is already ridiculously heavy, your plans will only make this worse, and absolutely insufferable for residents that live here.</p> <p>Previous applications to build on these sites have been declined for reasons already highlighted by residents etc. Nothing has changed in the views of the people that have objected previously. Why include the areas in your planning, we keep going around this loop, it's getting you nowhere.</p> <p>West Berkshire Council should consider the bigger picture and not just pockets of land in isolation. With the planning being considered in and around Theale, we are looking at excessive business and residential traffic, the area cannot take it all, movement on the roads will stop.</p> <p>We don't have the infrastructure and support services to accommodate any more housing and its residents. We need better drainage, better roads and improved medical services. The new primary school is already full.</p> <p>Please take my concerns and those from others, that I am sure you will receive, more seriously and stop this madness just to meet unreasonable government targets.</p>	
Councillor Tony Vickers (lpr974)	Policy is supported.	Comments noted.
<b>Landowners, site promoters and developers</b>		
Savills on behalf of Englefield Estate (lpr1534)	<p>The LPR Emerging Draft proposes to carry forward a significant number of site allocations from the Housing Site Allocations DPD (HSA DPD), including two sites owned by the Englefield Estate at The Green, Theale (HSA DPD ref. HSA14) and at Pondhouse Farm, Burghfield Common (HSA DPD ref. HSA15). As noted above, the intention to carry forward these two sites is welcomed. It is noted that the new draft LPR Policies RSA15 (Land between A340 and The Green, Theale) and RSA18 (Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common) are identical to HSA DPD Policies HSA14 and HSA15.</p>	<p>Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. As development has not yet been built out, the allocation is being retained. The site has planning permission.</p>



**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR Policy: RSA16 Whitehart Meadow, Theale**

**(Proposed Submission LPR Policy: RSA10 Whitehart Meadow, Theale)**

Number of responses received: 25

Respondent <i>(with lpr ref)</i>	Response	Council Response
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Theale Parish Council (lpr1103)	<p><b>Theale’s character</b> Theale is a historic village with its own rural identity. Its location entails strong rail and road links, making it an excellent location for businesses. However, this presents a risk to the village’s character and makes it vital to keep the two areas separate. The allocated and proposed sites for development listed below bely this.</p> <p><b>Proposed residential developments at Whitehart Meadow (RSA 16) and the former sewage works (RSA 17)</b> The proposed sites for development at Whitehart Meadow and the former sewage works present similar issues. Both sites suffer from inadequate access. The former would increase traffic on the High Street and at the A4 roundabout with Hoad Way, which presents risks to pedestrians and drivers alike. Both developments would result in a significant loss of green space between the village and the M4. This green barrier helps to retain the village’s rural character. It is also an unnecessary change to the existing settlement</p>	<p>Comments noted.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by</p>

Respondent (with lpr ref)	Response	Council Response
	<p>boundary. Both sites also sit on a flood plain. Any development would remove necessary ground drainage and increase the risk of flooding.</p> <p><b>Theale's infrastructure</b></p> <p>The proposed developments present a substantial increase in Theale's population. Following the approval of the Lakeside development of over 300 houses—already a large increase—the village needs an adjustment period to recognise deficiencies in the existing infrastructure. The following facilities would need addressing urgently:</p> <ul style="list-style-type: none"> <li>• the medical centre would need to expand</li> <li>• sewage and drainage would need upgrading</li> <li>• the new primary school was built to accommodate the existing number of pupils attending—this would need to expand and</li> <li>• there would need to be a community hub or leisure centre—something which is currently lacking.</li> </ul> <p><b>Conclusion</b></p> <p>Taken in their totality, the additional sites for development identified in the draft Local Plan represent an unacceptable increase to the size of Theale. The parish council strongly encourages a period of adjustment following the already approved large-scale developments, otherwise it is concerned how the existing infrastructure will be able to cope.</p> <p>The parish council strongly encourages a period of adjustment following the already approved large-scale developments, otherwise it is concerned how the existing infrastructure will be able to cope.</p>	<p>development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>In relation to infrastructure the development would generate CIL monies to be put towards the improvement of facilities, though the development would not be large enough to justify the provision of a community hub or leisure centre.</p> <p>Thames Water comment that the water network capacity will need to be improved, and request a detailed water supply strategy informing what infrastructure is required, where, when and method of delivery. Implementation of the strategy would be secured through the planning permission.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p>

Respondent (with lpr ref)	Response	Council Response
		Given the landscape advice provided and the reduction of the developable area the number of dwellings expected to be delivered would reduce from 100 to approximately 40.
Environment Agency (lpr1668)	<p>The headwaters of the Sulham Brook (main river) flow through the centre of the site and there is an ordinary watercourse on the eastern boundary. Headwaters of rivers are important as they play a number of essential roles including maintaining biodiversity, retaining nutrients and providing natural flood control measures. They are often extremely valuable for fish spawning that would include native brown trout and bullhead in this location. Therefore a detailed environmental appraisal would need to be undertaken to assess potential impacts of a development, from direct loss of habitats in the footprint of the development and indirect impacts such as changes in the groundwater.</p> <p>If this site was to become an allocated site for development, we would require a minimum 10m wide undeveloped buffer zone on both sides of the Sulham Brook, preferably wider given these are the headwaters. It would also need to be proven that there were no adverse impacts on the springs arising from the chalk that feeds the brook. Without this wording strengthening the allocation, the local plan could be found unsound in the future.</p>	<p>Comments noted.</p> <p>The policy will require a minimum 10m wide undeveloped buffer zone on both sides of the Sulham Brook.</p> <p>The policy will also include a criterion requesting an ecological assessment, to include an investigation of direct and indirect changes to habitats.</p>
Natural England (lpr1607)	Similarly to EMP6, the line of pylons form a good natural point to end any development out of Theale, whilst still providing buffer to the M4 and disconnect from Reading. The triangle of open green space at the north west of the site should be retained and enhanced into the site to create areas which are of recreational benefit for people enjoying the outdoors, as well as improved and managed habitats for biodiversity. Development itself should not come hard up against the triangle of open space to avoid overlooking (which might cause safety concerns for people using green space and lead to lack of use). We welcome the proposed further landscape assessment to determine the developable area.	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA.</p> <p>The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to</p>

Respondent (with lpr ref)	Response	Council Response
		limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.
Thames Water Utilities (lpr1754)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p> <p><u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
BBOWT (lpr996)	<p>The Whitehart Meadow site appears to support a varied habitat mosaic and has potential to support a variety of protected species that have not been considered in the policy wording.</p> <p>BBOWT suggests the suitability of this site to support the proposed scale of development should be informed by an ecological assessment.</p>	<p>Comments noted.</p> <p>The site is within close proximity to a number of environmental receptors. An ecological assessment will be required as part of a planning application, together with appropriate mitigation, as follows:</p> <p><u>'An Ecological Impact Assessment (EclA) will be required. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected. Such a survey will cover the potential impacts from the direct loss of habitats in the footprint of the development and indirect impacts such as changes in the groundwater.'</u></p> <p>The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p>
Mid & West Berks Local Access Forum (lpr1876)	<p>MWBLAF notes that a public footpath runs through this site, but that the route of the 'footpath on the ground' does not appear from satellite photos to follow the line of the public right of way on the definitive map. This is not addressed in the policy.</p> <p>The Forum recommends that an additional statement is added to this policy, to address this public footpath:  <b><u>The public footpath should be retained as a distinct route for pedestrians, and not absorbed into the road network of this development.</u></b></p>	<p>Comments noted.</p> <p>The following criterion is proposed:</p> <p><u>'Main internal walking and cycle routes for the site will be provided and will be linked to existing routes including the Public Rights of Way network'.</u></p>
North Wessex Downs AONB (lpr1616)	<p>The existing site is overgrown scrub which has a negative impact on the setting of the AONB and Theale. An appropriately scaled and design development has the potential to enhance the local landscape. A strong landscape buffer on the NE edge would soften the edge of the M4 whilst providing a natural acoustic barrier to any new homes. The existing</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA)</p>

Respondent (with lpr ref)	Response	Council Response
	overhead lines (pylons) provides a natural break point for defining the developable area.	for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.
<b>Other stakeholders</b>		
Councillor Alan Macro (lpr761)	<p>This site is important to the setting of Theale and to its maintenance as a separate settlement. Any development on this site would erode Theale's separation from Calcot and Tilehurst, contrary to the requirement in policy SP1 that "the individual identities of the separate settlements within this [Eastern Spatial] area will be maintained".</p> <p>The site is bounded by the M4 motorway and thus subject to noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or standstill past this site. This worsens air pollution because:</p> <ul style="list-style-type: none"> <li>• The density of vehicles increases as they close up</li> <li>• Vehicle engines produce more pollution when idling or running slowly</li> <li>• The pollution does not disperse so widely because it is not dispersed by moving traffic.</li> </ul> <p>High voltage power lines run over the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA.</p> <p>The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features</p>

Respondent (with lpr ref)	Response	Council Response
	<p>oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitiu and Natalia Raischi:  <a href="https://www.researchgate.net/publication/319878124">https://www.researchgate.net/publication/319878124</a>  <u>Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines</u>).</p> <p>This would add to the pollution caused by the M4.</p> <p>The site also suffers from groundwater flood risk and much of it is in flood zone 2. High groundwater levels also preclude infiltration as a SUDS solution.</p> <p>The site is the source of the Sulham Brook and the high peat content of its soil attenuates surface water run-off into the brook. Any development of the site would significantly reduce this attenuation and increase the flood risk downstream (the brook flooded part of Pangbourne in 2007).</p> <p>Traffic generated from the housing would contend with the traffic from the congested High Street at the Hoad Way Junction and with that on the busy A4, particularly in the morning peak. This would add to congestion in the High Street, at the Hoad Way/A4 roundabout and at M4 J12. It would also exacerbate traffic problems elsewhere in the highway network in Theale as described in the comments on the Non-strategic site allocations section.</p> <p>The use identified in the HELAA is "Employment uses (B2/B8)". Residential use is therefore contrary to policy SP1 of this plan which states that "allocations will be related to the role and function of settlements and the development opportunities <b>identified through the HELAA</b>".</p> <p>The reasons for removing this site from the Housing Site Allocations DPD are still valid:</p> <ul style="list-style-type: none"> <li>The site was assessed in the 2013 Strategic Housing Land Availability Assessment (site ref was THE002) as 'potentially developable'. The site was subsequently assessed in more detail during the preparation of the Housing Site Allocations Development Plan Document, whereby the site was not recommended for allocation due to the location of the site adjacent to the M4 (and resultant noise and air quality issues), and the location of a pylon in the centre of the site</li> </ul>	<p>should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The site has been the subject of a challenge to the Flood Zone designation (landowner led), where the Environment Agency has amended the area of flood risk. The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>The Environment Agency has specified that a 10m buffer is provided and maintained either side of the Sulham Brook, and this will form part of the policy criteria.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p> <p>The site has also been promoted for housing.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>In addition, the Environment Agency strongly recommended that the site was not allocated due to majority of it being in Flood Zone 2. A sequential test would have been required to allocate the site in the Housing Site Allocations Development Plan Document. Other suitable sites with a lower risk of flooding were available in Theale and across the district, so the Council would have been unable to carry out the sequential test.</li> </ul> <p>Site RSA16 should be removed from the plan</p>	
Councillor Tony Vickers (lpr575)	<p>This site is important to the setting of Theale and to its maintenance as a separate settlement. Any development on this site would erode Theale's separation from Calcot and Tilehurst, contrary to policy.</p> <p>The site is bounded by the M4 motorway and thus subject to noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or standstill past this site. This worsens air pollution because:</p> <p>The density of vehicles increases as they close up  Vehicle engines produce more pollution when idling or running slowly  The pollution does not disperse so widely.</p> <p>High voltage power lines run over the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitiu and Natalia Raischi <a href="https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines">https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines</a>). This would add to the pollution caused by the M4.</p> <p>The site also suffers from groundwater flood risk and much of it is in floodzone 2. High groundwater levels also preclude infiltration as a SUDS solution.</p> <p>The site is the source of the Sulham Brook and the high peat content of its soil attenuates surface water run-off into the brook. Any development of the</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA.</p> <p>The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west</p>



Respondent (with lpr ref)	Response	Council Response
	<p>site would significantly reduce this attenuation and increase the flood risk downstream (the brook flooded part of Pangbourne in 2007). Traffic generated from the housing would contend with the traffic from the congested High Street at the Hoad Way Junction and with that on the busy A4, particularly in the morning peak. This would add to congestion in the High Street, at the Hoad Way/A4 roundabout and at M4 J12</p>	<p>of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The site has been the subject of a challenge to the Flood Zone designation (landowner led), where the Environment Agency has altered the area of flood risk. The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application. The Environment Agency has specified that a 10m buffer is provided and maintained either side of the Sulham Brook, and this will form part of the policy criteria.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p>
Yvonne Thorngate (lpr36)	<p>I live in Rotherfield Close and the noise and pollution from the Motorway is horrendous. In fact I am in the process of moving because of this. I am sure the pollution must exceed the legal levels, and in the recent case of a child dying from the effects of breathing in vehicle fumes who lived along side the North Circular in London. I am appalled that you would expect families with young children to live so close to this busy Motorway. I therefore find it hard to believe you are proposing to allow homes to be build even nearer to the M4 than the home I am currently living in. The noise levels are so bad that at certain times of the day it is impossible to sit outside. As well as the Motorway these new properties will have high voltage electric pylons</p>	<p>Comments noted.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p>

Respondent (with lpr ref)	Response	Council Response
	overhead. You may think I just don't want houses built near to my property, but this is not the case at all. The land which you are proposing to allow building on is an eyesore, but it is entirely unsuitable for homes for young families.	National Grid have advised the Council that there should be a buffer around the high voltage power lines. Guidance has been released which the developers will need to take into account, as per the criterion in the policy.
David Addis (lpr40)	100 homes on Whitehart Meadow - Again totally insufficient access and significantly increased traffic both on the High Street and into Woodfield Way.	Comments noted.  The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.
Diane Spence (lpr1020)	<p>I wish to raise my objections to the following proposals for yet more development in Theale village. This is despite the fact that you have already given the OK to build 400+ homes on the western side of Theale. We do not want Theale to become a town like Thatcham – we want to remain a village.</p> <p><u>RSA16 100 homes on Whitehart Meadow</u></p> <p>My objections are:- flood risk, noise and pollution from M4, possible land contamination and the existence of pylons.</p> <p><u>General objections</u> to the above (including 70 homes at old Theale Sewage site) – do you ever take into account the pressure large development will cause to the already over subscribed Theale Medical Centre and the increased traffic. (We don't all ride bikes).</p> <p>Lastly, I know this view will not count, but can't we leave some field space for the deer to roam – we have already taken acres away from them and they were here first?</p>	<p>Comments noted.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>It is important for the development (and taking into account the Sewage Treatment Works) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to the west of the pylons, allowing open space and a landscaped buffer.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The policy requires the submission of a contamination report, identifying any mitigation should it be necessary.</p> <p>National Grid have advised the Council that there should be a buffer around the high voltage power lines. Guidance has been released which the developers will need to take into account, as per the criterion in the policy.</p> <p>In relation to infrastructure the development would generate CIL monies to be put towards the improvement of facilities. Legal agreements, to be prepared through the planning application, may also include mitigation for essential services.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p>
Lisa Cox (lpr1245)	<u>RSA 16 &amp; 17</u>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>WBC have already approved 425+ dwellings at the opposite end of the village with no regard for improvements to the infrastructure that cannot cope. The Primary School and Doctors Surgery are already at capacity, drainage and sewerage facilities need updating.</p> <p>There are a lack of community facilities such as a leisure centre (nearest one is not accessible by public transport routes and requires a car to access it) or community hub.</p> <p>I firmly believe WBC need to see and assess the effect the already approved dwellings have on the village and its infrastructure before designating further land to housing.</p> <p>This land could be used for the community facilities the village is desperately needing and WBC should give that consideration rather than its current proposal.</p> <p>RSA 16 &amp; 17 – consider this land for use to deliver community facilities</p>	<p>In relation to infrastructure the development would generate CIL monies to be put towards the improvement of facilities, and this could include sports facilities, as the development may not be large enough to justify the provision of a community hub or leisure centre. Legal agreements, to be prepared through the planning application, may also include mitigation for essential services.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p>
Ami Painter (lpr1260)	<p>I would like to submit my objections to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and the open land situated near Junction 12 EMP6.</p> <p>The area of Theale on the opposite side of the A4 to Arlington should be kept to the existing residential areas and not be expanded for the above reasons. In addition to this, there are already office and commercial sites in both Arlington and the Station Road areas where buildings are sat empty with no companies taking up the leases. With the increase in home working and out of town warehouse sites, it would not be appropriate to impact the local environment and put stresses on the local highways by adding unnecessary commercial properties, where there are already redeveloped</p>	<p>Comments noted (relating only to Whitehart Meadow. The comments relating to Theale Sewage Treatment Works are considered under responses to RSA17, and for the employment site THE8 under SP21).</p> <p>It is important for the development (and taking into account the Sewage Treatment Works) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to the west of the pylons, allowing open space and a landscaped buffer. The policy contains criteria which guide development and associated landscaping.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>sites across Theale that are not in use and have been sat empty for some time.</p> <p>The green spaces of Theale should be left as such before the village becomes an overdeveloped struggling area of West Berks that merges into Reading Borough Council, with facilities and resources that are not fit for purpose and drives existing residents away for the sake of building on land for financial gain and not considering the people, environmental and highway impacts it would have.</p>	<p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4. It is not envisaged that Blossom Lane would be used for Whitehart Meadow.</p>
Beth Pert (lpr1287)	<p>I would like to submit my objections to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and the open land situated near Junction 12 EMP6.</p> <p>The plan includes the following:</p> <p>100 homes on Whitehart Meadow (the area of land between the Woodfield Way estate and the M4)</p> <p>70 homes on the site of the old Theale sewage works (the far end of Blossom Lane).</p> <p>20,000 square metres of new office space on the field next to M4 Junction 12.</p> <p>I object to the draft for the following reasons (across all sites):</p> <ul style="list-style-type: none"> <li>• Flood risk</li> <li>• High voltage overhead power lines cross the site</li> <li>• Noise and pollution from the motorway</li> <li>• Possible land contamination</li> <li>• Need to preserve the gap between Theale and Calcot/Tilehurst</li> <li>• Impact on the Area of Outstanding Natural Beauty</li> <li>• Risk from fluvial, surface water and ground water flooding</li> <li>• Separated from the Arlington Business Park by the busy A4 Theale bypass</li> <li>• Impact on the Theale High Street Conservation Area</li> <li>• Impact on surrounding housing</li> </ul>	<p>Comments noted (relating only to Whitehart Meadow. The comments relating to Theale Sewage Treatment Works are considered under responses to RSA17, and for the employment site THE8 under SP21).</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>National Grid have advised the Council that there should be a buffer around the high voltage power lines. Guidance has been released which the developers will need to take into account, as per the criterion in the policy.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The policy requires the submission of a contamination report, identifying any mitigation should it be necessary.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Unsuitable access via single-track Blossom Lane and Crown Lane</li> <li>• The requirement for office space was based on a council commissioned study that was carried out before the covid 19 outbreak.</li> </ul> <p>As a resident of Theale, my objections are based on my experience of living in the village on and off for nearly 20 years.</p> <p>The basic infrastructure of the village cannot cope with a further 170 homes. The GP surgery is already stretched to breaking point and not able to provide a high standard of patient care for local residents. An extra 170 homes would see upwards of 350 patients. This would overwhelm the surgery completely. This is even more of an issue given that the residents of the homes currently under construction on Beansheaf side of the M4 will also be registering at Theale Medical centre when the properties are completed.</p> <p>The local primary school, which was built on land used for sports and recreation, is also near to capacity. Building more homes and bringing more families in to Theale will mean the school is no longer fit for purpose and will require further extension, taking up yet more valuable green land.</p> <p>Having lived in a flat with no useable outside space during the covid pandemic, it has become even more evident how important local green space is. Building on Whithart Meadow will take away precious green space that is local to residents. The impact on our local wildlife would be irreversible too.</p> <p>The access to both sites is problematic. Woodfield Way is already very busy and with parked cars on both sides of the road, the road is already noisy and at times can be dangerous. As new homes are regularly built without sufficient parking, more cars would be using local access roads as a car park, thus increasing the noise, traffic and antisocial problems associated with on street parking. Blossom Lane has similar issues with the added problem of being very narrow. Construction traffic would cause a great deal of disruption to local residents too.</p> <p>Building on sites which have a risk of flooding seems incredibly short sighted, especially at a time where a change in our climate indicates an increased amount of annual rainfall. By building on these sites, there may be an increased risk to existing homes as well as any new homes.</p>	<p>It is important for the development (and taking into account the Sewage Treatment Works) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to the west of the pylons, allowing open space and a landscaped buffer. The policy contains criteria which guide development and associated landscaping. Open space provision, including the joining up of existing rights of way, are required in policy.</p> <p>The Conservation Officer does not raise an objection to the proposal's impact on the conservation area.</p> <p>The development will be visible from existing dwellings, though planning policies are in place in the Local Plan to protect amenity. Sufficient distances shall be maintained and good design will be required. It is important that the development integrates with existing development, rather than as a stand alone development.</p> <p>In relation to infrastructure the IDP sets out the infrastructure requirements.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment</p>

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	<p>While I understand the need to more homes to ease the housing crisis, I feel better options are available. Commissioning further studies in to the regeneration of empty, dilapidated and part derelict office blocks and warehouses in to energy efficient homes would be more beneficial to the local community and saving our precious green space.</p>	<p>to model the junctions at the A4 and M4 to fully assess the capacity of the A4. It is not envisaged that Blossom Lane would be used for Whitehart Meadow.</p> <p>The Local Plan provides parking standards, depending on the number of bedrooms and location. The development should therefore cater for vehicles. The location is sustainable, with access to public transport and public rights of way, and thus there is a choice of movement.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>The District is still in need of office and warehouse space, and permitted development rights exist to convert offices to dwellings. It is not considered that such evidence is necessary.</p>
Jayne Dowe (lpr2096)	<p>I would like to comment that I do not support the areas proposed for development (<i>in Theale</i>) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The impact of additional traffic on the village. The proposed access route for Whitemeadow and the adjacent field is a major route used by pedestrians to access the footbridge over the motorway. Additional traffic will raise risks to pedestrians, particularly school children. The high street is narrow and already ill-equipped to deal traffic. The junction is already busy due to its proximity to the motorway, business parks and the A4.</li> <li>• Blossom Lane is a narrow quiet residential road, increased traffic would cause further risks and inconvenience.</li> <li>• The impact on the estates that will be adjacent to the development – Woodfield Way, Alderfield Close etc, leading to overcrowding,</li> </ul>	<p>Comments noted (relating only to Whitehart Meadow. The comments relating to Theale Sewage Treatment Works are considered under responses to RSA17, and for the employment site THE8 under SP21).</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4. It is not proposed to use Blossom Lane for access to Whitehart Meadow.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>impact on view, traffic through the local area. This will impact on the living standards of existing residents.</p> <ul style="list-style-type: none"> <li>• The development will reduce the protective barrier between existing homes and the motorway.</li> <li>• The negative impact on living standards in regards to the new developments being in extremely close proximity to the overhead power lines and the motorway, leading to poor air quality, noise pollution and poor living environment for potential 'new' residents.</li> <li>• The impact on services within Theale, which are already under strain, particularly at this time health services.</li> <li>• Reduction in the boundaries between Theale and Calcot.</li> <li>• All three locations are abundant with wildlife, whose habitat would be destroyed.</li> <li>• Much of the office space within Arlington business park is currently not in use, therefore it is unclear why further office space would be required. The visual impact of the structures will affect the outlook of the village on approach.</li> <li>• The continued development in these areas will continue to spoil the aesthetic of the village as a whole. There are already approved areas of significant housing development within Theale, if these additional areas are also approved the village will lose its character and become overcrowded, overrun by traffic and will have a significant negative impact on existing residents.</li> </ul>	<p>The development will be visible from existing dwellings, though planning policies are in place in the Local Plan to protect amenity. Sufficient distances shall be maintained and good design will be required. It is important that the development integrates with existing development, rather than as a stand alone development.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>National Grid have advised the Council that there should be a buffer around the high voltage power lines. Guidance has been released which the developers will need to take into account, as per the criterion in the policy.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be</p>



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		<p>incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p>
Harvey Fletcher (lpr1967)	<p>I object to RSA16, the proposed allocation for mixed-use development in Whitehart meadow for the following reasons:</p> <ul style="list-style-type: none"> <li>• Inadequate road access will put too much traffic through the small roundabout on Theale high street and cause excess noise pollution</li> <li>• The development will negatively affect the Theale High Street conservation area</li> <li>• I do not want to look out my window and see offices and houses, I would much rather see the open green space which is there now. The proposed site is right next to my residence.</li> <li>• There is no demand for office space in this area. Half of the current existing Arlington business park is vacant.</li> <li>• The noise levels from the motorway (M4) would make it uncomfortable for residents of the proposed housing.</li> </ul>	<p>Comments noted.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p> <p>The conservation officer has not objected to the proposal based on the impact on the conservation area.</p>

Respondent (with lpr ref)	Response	Council Response
	I do not want the proposed changes for RSA16 or RSA17 approved.	<p>The development will be visible from existing dwellings, though planning policies are in place in the Local Plan to protect amenity. Sufficient distances shall be maintained and good design will be required. It is important that the development integrates with existing development, rather than as a stand alone development.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The site would not accommodate any offices.</p>
Melanie Paul (lpr1372)	<p>[See also for other Theale sites, lpr 1371,1373] I am writing to provide feedback on West Berkshire's Local Plan Review 2020 -2037 Emerging Draft December 2020.</p> <ul style="list-style-type: none"> <li>- West Berkshire's own policy C1 outlines that the council are opposed to developing the countryside. Yet all the areas identified in the plans in and around Theale are part of a small area of countryside that we have left as you have persisted in your unrelenting drive to destroy the village.</li> <li>- Thea areas identified are home for wildlife of many types, including for example; Deer, Roebuck, Foxes, Owls and Pheasant. We can't keep blindly pushing animals out, this is selfish and only represents West Berkshire Council's support for human greed and the belief that humans own this world and every other being is irrelevant. This has to stop, animals need a habitat to live in too.</li> <li>- The well-being of the people that live in the village have had no consideration in the planning. Theale residents have had enough of West Berkshire Council's need to dump all the development at this end of the</li> </ul>	<p>Comments noted (relating only to Whitehart Meadow. The comments relating to Theale Sewage Treatment Works are considered under responses to RSA17, and for the employment site THE8 under SP21).</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>There are significant housing developments planned in Thatcham and Newbury. Due to the coverage of the Area of Outstanding Natural Beauty, areas of flood risk and the restriction of development around the Atomic Weapons Establishments there are limited locations for development</p>

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	<p>County. There is plenty of space to choose from at the Newbury end. Please stop your land grabbing in and around the area near the M4, it's impacting the wellbeing of the residents you are supposed to represent.</p> <ul style="list-style-type: none"> <li>- Covid-19 has demonstrated that packing people into closely built housing estates only fuels the spread. West Berkshire's cases have been lower because of the open areas. This needs to be considered for future as there is no doubt there will be more exposure to pandemics if we continue to ignore the need for green space and less compacted settlement areas.</li> <li>- The areas in question act as natural borders around Theale, protecting us from the noise of the M4 &amp; A4.</li> <li>- We don't need more commercial buildings, Arlington Business Park and the Arrowhead Road area has plenty of un-used space on the other otherside of the A4. By building on the Village side, you only increase traffic volumes in the village and cause more noise and air pollution.</li> <li>- The volume of traffic in Theale, and the area of Junction 12 of the M4 is already ridiculously heavy, your plans will only make this worse, and absolutely insufferable for residents that live here.</li> <li>- Previous applications to build on these sites have been declined for reasons already highlighted by residents etc. Nothing has changed in the views of the people that have objected previously. Why include the areas in your planning, we keep going around this loop, it's getting you no where.</li> <li>- West Berkshire Council should consider the bigger picture and not just pockets of land in isolation. With the planning being considered in and around Theale, we are looking at excessive business and residential traffic, the area cannot take it all, movement on the roads will stop.</li> <li>- We don't have the infrastructure and support services to accommodate any more housing and it's residents. We need better drainage, better roads and improved medical services. The new primary school is already full.</li> </ul>	<p>needed to meet housing targets. The Council are considering the 'overall picture' in seeking to place developments in locations which are accessible and have existing infrastructure.</p> <p>Development would include green space, which will be public, and still of benefit to existing residents.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p> <p>In relation to infrastructure the development would generate CIL monies to be put towards the improvement of facilities. Legal agreements, to be prepared through the</p>

Respondent (with lpr ref)	Response	Council Response
	Please take my concerns and those from others, that I am sure you will receive, more seriously and stop this madness just to meet unreasonable government targets.	planning application, may also include mitigation for essential services. The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.
Melanie Paul (lpr1373)	As per 1372 above (duplicate representation).	As above representation lpr1372.
Meg Randall (lpr1440)	<p>I am writing to oppose the recent plans made for housing and offices in whitehart meadow, Theale sewage works and the field next to the m4 junction 12. I believe it is of great importance to keep these few areas of wildlife we still maintain in Theale and for a village so quaint and with such character these unlikely areas contribute greatly to the feel of the village. In times like these we have learned how important nature is to a community such as the one in Theale. These areas are the only accessible walks within the village out of the way of houses and the only thing I believe can improve Theale would be more wildlife and walks! This has benefitted my mental health greatly as well as other people's and I strongly believe we need to maintain these natural and fascinating locations rather than expanding a village that has always thrived off of its old and quaint character.</p> <p>Thankyou for taking the time to read my email and I really hope you take this into consideration</p>	<p>Comments noted (relating only to Whitehart Meadow. The comments relating to Theale Sewage Treatment Works are considered under responses to RSA17, and for the employment site THE8 under SP21).</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>Development would include green space, which will be public, and of benefit to existing residents. The policy seeks connections to existing public rights of way.</p>

Respondent (with lpr ref)	Response	Council Response
Paul Massey (lpr681)	Does not agree with the proposed site allocation.	Comments noted.
Kevin Aylett (lpr820)	<p>Objection to RSA16 Whitehart meadow, Theale  A habitat wild animals including deer  Need to have a green gap between Theale and Calcot  Flood risk as shown on 2<sup>nd</sup> Feb flood alert map  Outside the settlement boundary</p>	<p>Comments noted.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development</p>

Respondent (with lpr ref)	Response	Council Response
		<p>would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>The settlement boundary would be drawn around the site.</p>
J Painter (lpr2014)	<p><i>(Response to RSA16, RSA17, EMP6. Included text relevant to RSA16)</i> I am objecting to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and land situated near Junction 12 EMP6.</p> <p>I am a resident of Theale of over 20 years and have seen the impact that several developments over this time has had on the infrastructure of the village.</p> <p>Theale Medical Centre struggles to provide adequate facilities for the 10,000+ patients it has over the Theale and Calcot areas. With the proposed 170 properties to be built in the Surgery's geography, the impact on the current patient levels and care provided will be detrimental. This would be in addition to the already growing numbers of patients given the development site that is currently being built opposite the Sainsbury's retail site near Junction 12 in Calcot, who will also be served by Theale Medical Centre.</p> <p>Theale Primary School also had to be redeveloped onto a new site on North Street playing fields, which meant local footballs teams and the community lost open space to play on and use for recreational purposes. The impact of 170 new homes would mean more residents would not have enough space for recreational use, as well as new families moving into the village putting pressure onto the primary school, which is becoming quickly overwhelmed with the number of pupils it already has.</p> <p>The local highways in Theale would also not be able to cope with the increase in traffic across all sites. As a resident of Woodfield Way, there have been numerous times where the access to this part of Theale has been blocked due to traffic issues along the A4 and M4. The High Street is often used as a cut through when the bypass is at a standstill and this means local residents are either trapped in the village unable to leave, or unable to</p>	<p>Comments noted (relating only to Whitehart Meadow. The comments relating to Theale Sewage Treatment Works are considered under responses to RSA17, and for the employment site THE8 under SP21).</p> <p>In relation to infrastructure the IDP sets out infrastructure requirement</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p> <p>The Highways Authority comment that the site should be accessed from the High Street, entailing the removal of the road block facilities. The Highways Authority also comment that in highway capacity terms there is support for the use of the High Street and the mini-roundabout at Hoads Way. There is a need for a Transport Assessment to model the junctions at the A4 and M4 to fully assess the capacity of the A4.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>access their homes due to the volume of traffic. As there is only 1 access point for the Woodfield Way area of Theale, increasing pressure on this site with the addition of 100 home and 20,000 sqft of commercial property will cause not only disruption to those who live in these areas, but will also increase the impact on the environment with more vehicles and the pollution it will cause.</p> <p>The increase in numbers of vehicles will also cause issues given the current problems experienced with restrictions in access around the Woodfield Way/High Street area. Commercial units at the top of Woodfield Way park their vehicles outside of their units, and residents who have multiple vehicles use the roads to park their cars/vans which narrows the road access. There is constantly a risk that emergency services would not be able to get to the properties furthest down Woodfield Way due to the current number of vehicles that use the roads as a car park. Adding 100 homes, with the same number if not more cars/vans etc. would be more than the local highways would be able to cope with.</p> <p>Now more than ever the open green land of Theale should be left as such, as it allows the community the ability to take exercise without travelling which is key given the current pandemic. To lose this land would also impact on the natural habitats of the wildlife living there, which will displace many animals. Trees have already been cut in the Whitehart Meadow site, and this has caused an increase in light and noise pollution from Junction 12, IKEA and its car park along with the overnight roadwork noises from the smart motorway works. Placing 100 properties on this land would be detrimental to those who live next to and opposite the site due to the disruption the development would cause on both the residents and highways, along with it being built on a site of flood risk and uncomfortably close to the overhead power lines/pylons situated in the land.</p> <p>Lastly, with building on the proposed sites, the gap between Theale and Calcot/Tilehurst will significantly decrease. Theale is already situated in a difficult location where emergency services are pulled from opposite towns to the furthest reach of their geography to attend to us. Both Reading and Newbury Police and Ambulance crews find it difficult to attend as we are</p>	<p>developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>approx. 10 - 15 miles from each local station for crews to be sent. By adding more residential and commercial sites to Theale this will add increasing pressure to services such as blue lights which is already stretched given our location and the current pandemic situation.</p> <p>For the above reasons, in addition to a site already marked for development along The Green near the Tidmarsh/A4 end of Theale, I object to the local plan review 2020 - 2037 covering sites Whitehart Meadow, The Old Sewage Works and the open land besides the A4 and M4 opposite Whitehart Meadow.</p> <p>I hope this objection will be well considered along with the areas of Theale that are already over developed and struggling to cope with the current population of the village.</p>	
<b>Landowners, site promoters and developers</b>		
Bell Cornwell LLP for Central Corporation Projects Ltd (lpr2297)	<p>We support the proposed allocation of White Hart Meadow for residential development.</p> <p>This is a positive approach by the Council which reflects the highly sustainable location of the site. We have included an indicative masterplan as part of these representations which shows how the site can be delivered. Whilst the site is allocated in policy RSA 16 for 'approximately' 100 dwellings, we seek flexibility with regard to the final numbers for the site to ensure that an effective use of land is achieved, at an appropriate density for the site and the surroundings. The final number is proposed to be informed by the technical work for the site.</p> <p>The site has the benefit of being able to provide a high level of green infrastructure to provide a buffer to separate the developable area from the highways network and to ensure the separate identity of Theale is maintained.</p> <p>We would be pleased to work with the Council to confirm a detailed policy to guide the development of the site, based on the technical information that we have prepared.</p> <p>We confirm that White Hart Meadow can be confirmed as a deliverable site and is being actively promoted by a willing developer who is committed to bringing the site forward.</p>	<p>Comments noted.</p> <p>The Local Plan is landscape-led. Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Whilst the site is allocated in policy RSA 16 for ‘approximately’ 100 dwellings, we seek flexibility with regard to the final numbers for the site to ensure that an effective use of land is achieved, at an appropriate density for the site and the surroundings. The final number is proposed to be informed by the technical work for the site.</p>	<p>watercourse, and to enhance the existing public right of way.</p> <p>The landscape assessment reduces the developable area, and taking the area of flood risk into account this reduces the potential number of houses to approximately 40.</p>
<p>Pegasus Planning Group Ltd for Calcot Park Golf Club (lpr2330)</p>	<p>(Full representation under SP14) It is considered that some of these sites are not ideally suited or justified and they should be removed from the list. In particular, the following:</p> <ol style="list-style-type: none"> <li>1. RSA 16 – Whitehart Meadow, Theale (Site Ref THE1)</li> <li>2. RSA 17 – Former Theale Sewage Treatment Works, Theale (Site Ref THE7)</li> </ol> <p>All of these sites are small and currently in use as open fields. Although they each adjoin the edge of a settlement, they offer very limited opportunities for landscaping, as well as biodiversity and geodiversity net gain. The plans in the local plan show they have issues with flooding, motorway noise or they are 95% covered in new development with a narrow “landscaped buffer” on the site edges. These sites are less suitable for allocation and they are poor choices for new housing to help meet the local need in the next few years than that proposed at Calcot Park Golf Club (CPGC).</p> <p>This policy states that this site should be allocated in the local plan for approximately 100 dwellings. The plan shows only a red line around the site. No “landscape buffers” are indicated on the boundaries of the site. Without any details on the plan, it must be assumed that these boundary treatments will be narrow and/or weak in their likely effectiveness. Such unsubstantial boundary treatments will not provide the 10% bio and geodiversity net gain required by policy SP11. Also, they will not provide the level of landscape and visual impact mitigation that is required by policy SP10. Boundary screening will be especially important in this location, which is low-lying land to the north of Theale and will therefore be visible in several long-distance views. In addition, the area is known to be very low-lying and liable to flooding, given proximity to the Sulham Brook, as well as being close to the M4, which will create problems of noise and air quality.</p>	<p>Comments noted.</p> <p>The Local Plan is landscape-led. Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. Whitehart Meadow is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. Development only across the north western part of the site could be accommodated without totally compromising the separate settlement identity of Theale from Calcot. This is subject to limiting the developable area to extend up to the pylons (to the east), and the watercourse (to the south), with the area beyond left for open space, and that development to be limited to two storeys in height. Landscaping features should be incorporated including buffer planting along the north eastern edge; development to be a lower density to allow significant tree planting; adequate buffer space to the watercourse, and to enhance the existing public right of way.</p> <p>The landscape assessment reduces the developable area, and taking the area of flood risk into account this reduces the potential number of houses to approximately 40.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The site, which has been previously refused by the Council in 2017 on grounds of being located within the countryside and flood risk, ref: 16/03613/OUTMAJ, provided a landscape strategy, but it is considered that in the form as previously submitted the scheme would not effectively overcome issues relating to proximity to the M4 nor would it adequately mitigate flooding and drainage concerns.</p> <p><i>Policy RSA 16 – Whitehart Meadow, Theale (Site Ref: THE 1) should be removed from the local plan, because the site is not suitable for residential development.</i></p>	<p>Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>The draft policy for the site allocation did not include detail on policy criteria or mapping. This will be done for the submission version of the plan. Landscaping is an important part of the development, particularly given the setting of the AONB and in recognition of the gap between Theale and Calcot. The recommendations of the LCA are to be built in to the policy criteria. Criteria would also deal with flood risk and noise and air quality.</p> <p>Since the refusal of the planning application there has been a successful challenge to remove some of the land out of Flood Zone 2. The flood maps have since been updated.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR Policy: RSA17 Former Theale Sewage Treatment Works, Theale (Site ref THE7)**

**(Proposed Submission LPR Policy: RSA11 Former Theale Sewage Treatment Works, Theale (Site ref THE7))**

Number of responses received: 23

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Theale Parish Council (lpr1104)	<p><b>Theale’s character</b> Theale is a historic village with its own rural identity. Its location entails strong rail and road links, making it an excellent location for businesses. However, this presents a risk to the village’s character and makes it vital to keep the two areas separate. The allocated and proposed sites for development listed below bely this.</p> <p><b>Proposed residential developments at Whitehart Meadow (RSA 16) and the former sewage works (RSA 17)</b> The proposed sites for development at Whitehart Meadow and the former sewage works present similar issues. Both sites suffer from inadequate access. The latter would require the use of Blossom Avenue. This road is inadequate for heavy construction vehicles and the ensuing increase in car traffic. Both developments would result in a significant loss of green space between the village and the M4. This green barrier helps to retain the village’s rural character. It is also an unnecessary change to the existing settlement</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. The Sewage Treatment Works is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site. It is recommended to limit the developable area, and to retain landscaped buffer areas to retain the immediate planted landscape setting. The development should be designed as a positive extension to the settlement pattern of Theale, by providing an attractive façade to the public open space to the south. Tree planting will be needed to break up the development form. Such buffer planting and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>boundary. Both sites also sit on a flood plain. Any development would remove necessary ground drainage and increase the risk of flooding.</p> <p><b>Theale's infrastructure</b></p> <p>The proposed developments present a substantial increase in Theale's population. Following the approval of the Lakeside development of over 300 houses—already a large increase—the village needs an adjustment period to recognise deficiencies in the existing infrastructure. The following facilities would need addressing urgently:</p> <ul style="list-style-type: none"> <li>• the medical centre would need to expand</li> <li>• sewage and drainage would need upgrading</li> <li>• the new primary school was built to accommodate the existing number of pupils attending—this would need to expand and</li> <li>• there would need to be a community hub or leisure centre—something which is currently lacking.</li> </ul> <p><b>Conclusion</b></p> <p>Taken in their totality, the additional sites for development identified in the draft Local Plan represent an unacceptable increase to the size of Theale. The parish council strongly encourages a period of adjustment following the already approved large-scale developments, otherwise it is concerned how the existing infrastructure will be able to cope.</p>	<p>design parameters (such as two storey dwellings) should aid in maintaining the wooded view from the AONB, as well as screening the M4.</p> <p>The landscape assessment has considered the cumulative impact of the developments at the Sewage Treatment Works and Whitehart Meadow. Development of both sites could integrate well into the existing settlement form and pattern of Theale, with green infrastructure improvements.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>In relation to infrastructure the development may not be large enough to justify the provision of a community hub or leisure centre. Infrastructure requirements are set out in the IDP.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p>

Respondent (with lpr ref)	Response	Council Response
		Thames Water comment that the water network capacity will need to be improved, and request a detailed water supply strategy informing what infrastructure is required, where, when and method of delivery. Implementation of the strategy would be secured through the planning permission.
Englefield Parish Council (lpr724)	Englefield Parish Council objects to the proposed allocation under Policy RSA 17 of the Former Theale Sewage Treatment Works, Theale (Site Ref THE7) for residential development comprising approximately 70 dwellings. Having objected to an application on this site in 2016 our concerns remain unchanged. The access to this site via Blossom Lane and Crown Lane is wholly inadequate for carrying the volume of traffic concerned. The roads are too narrow and pass through quiet residential areas. If permitted, there will be unacceptable harm to local residents which will outweigh the benefit of new homes in this location. We are also concerned about the residential development being so close to the motorway given issues of noise and air quality.	<p>Comments noted.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p>
Environment Agency (lpr1669)	This site is a short distance downstream of Whitehart Meadow (RSA 16), but for this site the Sulham Brook forms the eastern boundary and an ordinary watercourse flows through the site. There are also springs arising from the chalk and therefore this is also part of the headwaters of the Sulham Brook. Therefore all of our concerns and requirements as described for RSA 16 are the same for RSA 17.	<p>Comments noted.</p> <p>The policy will require a minimum 10m wide undeveloped buffer zone on both sides of the Sulham Brook.</p>

Respondent (with lpr ref)	Response	Council Response
		The policy will also include a criterion requesting an ecological assessment, to include an investigation of direct and indirect changes to habitats.
Natural England (lpr1606)	<p>This site represents the most sensitive site for development to the East of Theale. The gap between the M4 and Theale town gets wider here and it has a very different, much more rural feel to EMP6 and RSA16.</p> <p>Development in this location would be an oddly-shaped expansion out of the existing townscape and beyond into the countryside, and would significantly alter the rural character. The triangle of non-AONB land North of Theale (between the major roads) still represents the setting of the North Wessex Downs AONB. Edging out of existing Theale into this countryside with a disconnected development could contribute to a presumption of more development in this area. The cumulative effect of this would be of significant detriment to the surrounding AONB. This allocation is one that Natural England have the most concerns with in the whole Local Plan. We would advise it is removed as a site allocation.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. The Sewage Treatment Works is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site.</p> <p>It is recommended to limit the developable area, and to retain landscaped buffer areas to retain the immediate planted landscape setting. The development should be designed as a positive extension to the settlement pattern of Theale, by providing an attractive façade to the public open space to the south. Tree planting will be needed to break up the development form. Such buffer planting and design parameters (such as two storey dwellings) should aid in maintaining the wooded view from the AONB, as well as screening the M4.</p> <p>The landscape assessment has considered the cumulative impact of the developments at the Sewage Treatment Works and Whitehart Meadow. Development of both sites could integrate well into the existing settlement form and pattern of Theale, with green infrastructure improvements.</p>
Thames Water Utilities Ltd (lpr1762)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>	<p>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>General consultation bodies</b>		
BBOWT (lpr998)	<p>The former Theale Sewage Treatment Works site appears to support a varied habitat mosaic and has potential to support a variety of protected species that have not been considered in the policy wording.</p> <p>BBOWT suggests the suitability of this site to support the proposed scale of development should be informed by an ecological assessment.</p>	<p>Comments noted.</p> <p>The site is within close proximity to a number of environmental receptors. An ecological assessment will be required as part of a planning application, together with appropriate mitigation, as follows:</p> <p><u>'An Ecological Impact Assessment (EclA) will be required. Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected. Such a survey will cover the potential impacts from the direct loss of habitats in the footprint of the development and indirect impacts such as changes in the groundwater.'</u></p>

Respondent (with lpr ref)	Response	Council Response
		The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and landscaping and tree planting.
North Wessex Downs AONB (lpr1617)	<p>The site is set out on a limb away from the settlement edge. It has a strong rural character that is detached from the urban character of Theale. The character of THE7 is significantly different to that of THE1. Development in this location would be at odds with the open countryside to the north and townscape to the south which would significantly alter the rural character of this part of Blossom Lane. The site forms an important gap within the setting of the AONB.</p> <p>The site should not be titled as former sewage treatment works as that suggests a brownfield site which is far from the case. All that remains of the sewage works are concrete foundations which occupy a tiny area of the site. The site adjoins THE1, it would have been logical to merge the 2 as one allocation which suggests the LPA are not overly confident or comfortable in including THE7 as an allocation and have therefore kept them separate which would make it easier to remove from the plan at a future stage.</p> <p>That policy RSA 17 and site THE7 be removed from the plan.</p>	<p>Comments noted.</p> <p>Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. The Sewage Treatment Works is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site.</p> <p>It is recommended to limit the developable area, and to retain landscaped buffer areas to retain the immediate planted landscape setting. The development should be designed as a positive extension to the settlement pattern of Theale, by providing an attractive façade to the public open space to the south. Tree planting will be needed to break up the development form. Such buffer planting and design parameters (such as two storey dwellings) should aid in maintaining the wooded view from the AONB, as well as screening the M4.</p> <p>The landscape assessment has considered the cumulative impact of the developments at the Sewage Treatment Works and Whitehart Meadow. Development of both sites could integrate well into the existing settlement form and pattern of Theale, with green infrastructure improvements.</p>
<b>Other stakeholders</b>		
Councillor Alan Macro (lpr762)	The site is severely contaminated from its history as a sewage works (until the mid-1980s) and as a depot for the old Bradfield Rural District Council.	Comments noted.



Respondent (with lpr ref)	Response	Council Response
	<p>The cost of de-contamination would make the provision of affordable housing on the site unviable, and perhaps make development of the site unviable.</p> <p>The site is close to the M4 motorway and thus subject to noise and air pollution. The latter is exacerbated in the morning peak because the M4 eastbound frequently slows to a crawl or standstill past this site. This worsens air pollution because:</p> <ul style="list-style-type: none"> <li>• The density of vehicles increases as they close up</li> <li>• Vehicle engines produce more pollution when idling or running slowly</li> <li>• The pollution does not disperse so widely.</li> </ul> <p>High voltage power lines run over the site. In addition to visual intrusion and danger of electrocution (e.g. from climbing ladders or scaffolding or from flying kites), scientific research shows that they generate ozone and nitrogen oxide air pollution (increased by 13% and 30% over normal levels according to paper "Emissions of pollutants and air quality in the area of influence of high voltage overhead electrical lines" by Cociorva Danut, Mihaela Andreea Mitiu and Natalia Raischi:  <a href="https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines">https://www.researchgate.net/publication/319878124_Emissions_of_pollutants_and_air_quality_in_the_area_of_influence_of_high_voltage_overhead_electrical_lines</a>).</p> <p>This would add to the pollution caused by the M4.</p> <p>A large proportion of the site is in floodzone 2. The site also has a risk from surface water and groundwater flooding (please see section in the HELAA). This significantly reduces the extent of deliverable land and the latter makes SUDS problematic.</p> <p>The access to the site would be from the single-track end of Blossom Lane. Blossom Lane is very narrow in places and also has narrow footways. The footway on its southern side (that most likely to be used by pedestrians from the site) is not continuous, meaning that pedestrians would either have to walk in the road or cross it twice giving road safety concerns.</p> <p>The majority of pedestrians walking to the western end of Theale High would walk along Blossom Lane and Crown Lane. Crown Lane's footways are extremely narrow, only 60cm in places, meaning that pedestrians would have to step off footways to pass each other. There is no footway at all on</p>	<p>Environmental Health officers note that there is a high risk of contamination at the site. This does not necessarily rule out development, and investigation, plus any remediation and possible future monitoring may be required. This is usually a planning condition with a planning permission, and was recommended for planning application 16/02850/OUTMAJ. The policy requires the submission of a contamination report, identifying any mitigation and remediation. The planning application 16/02850/OUTMAJ did not raise any viability issues in respect of contamination, as reports submitted with the application did not preclude development.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part</p>

Respondent (with lpr ref)	Response	Council Response
	<p>the west side of Crown Lane at its southern end. The combination of increased pedestrian traffic and narrow and missing footways means increased numbers walking in, and crossing, the road. This, in combination with increased vehicle movements caused by the development would pose road safety dangers.</p> <p>The majority of traffic accessing the site would use Crown Lane*. It would impose another 48 to 52 movements in the am peak and 40 to 48 in the pm peak**. This would have the following problems:</p> <ul style="list-style-type: none"> <li>• The lane is effectively sing-track because its eastern side is a parking bay reserved for residents. Opposing vehicles could cause gridlock.</li> <li>• Contention with traffic on the convoluted junction with the High Street would increase tailbacks on Crown Lane.</li> <li>• It would add to congestion on the High Street and at the Station Road min roundabout.</li> </ul> <p>12 to 16 vehicles accessing the site would use the Play Platt/Englefield Road junction in both peaks*. This would exacerbate the existing delays of 40 seconds in the am peak at this junction.</p> <p>It would also exacerbate traffic problems elsewhere in the highway network in Theale as described in the comments on the Non-strategic site allocations section.</p> <p>The reasons that the site was not allocated in the Housing Site Allocations DPD are still valid:</p> <ul style="list-style-type: none"> <li>• When the preferred options version of the Housing Site Allocations Development Plan Document was consulted upon, significant concern was raised regarding access to the site, with limited scope for improvements to be made without acquiring third party land.</li> <li>• Further technical work was carried out following preferred options, in particular landscape assessment work indicated that the site would be suitable for development subject to various mitigation measures, including a buffer to separate the site from the existing village. As a result, the site was not considered to be well related to the existing settlement and could result in a negative impact in terms of impact on the character of the built environment.</li> </ul> <p>At the submission stage, the site was not recommended for allocation.</p>	<p>of the planning application 16/02850/OUTMAJ where access issues were overcome.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>* Traffic movement information from the traffic assessment in the planning statement for application 16/02850/OUTMAJ, 88 homes at Former Sewage Treatment Works Theale, adjusted for 70 homes Site RSA17 should be removed from the plan</p>	
Councillor Tony Vickers (lpr576)	<p>The site is severely contaminated from its history as a sewage works (until the mid1980s) and as a depot for the old Bradfield Rural District Council. The cost of de-contamination would make the provision of affordable housing on the site unviable.</p> <p>The access to the site would be from the single-track end of Blossom Lane. Blossom Lane is very narrow in places and also has narrow footways. The footway on its southern side (that most likely to be used by pedestrians from the site) is not continuous, meaning that pedestrians would either have to walk in the road or cross it twice giving road safety concerns.</p> <p>The majority of pedestrians walking to the western end of Theale High would walk along Blossom Lane and Crown Lane. Crown Lane's footways are extremely narrow, only 60cm in places, meaning that pedestrians would have to step off footways to pass each other. There is no footway at all in Crown Lane at's souther end. These issues are both road safety dangers.</p> <p>The majority of traffic accessing the site would use Crown Lane*. It would impose another 53 to 57 movements in the am peak and 44 to 53 in the pm peak**. This would have the following problems:</p> <p>The lane is effectively single-track because its eastern side is a parking bay reserved for residents. Opposing vehicles could cause gridlock.</p> <p>Contention with traffic on the convoluted junction with the High Street would increase tailbacks on Crown Lane.</p> <p>It would add to congestion on the High Street and at the Station Road min roundabout.</p> <p>* According to the traffic assessment for application 16/02850/OUTMAJ, 88 homes at Former Sewage Treatment Works Theale, 75-80% of traffic going to/from the site would use Crown Lane.</p> <p>Remove this allocation from the Plan.</p>	<p>Comments noted.</p> <p>Environmental Health officers note that there is a high risk of contamination at the site. This does not necessarily rule out development, and investigation, plus any remediation and possible future monitoring may be required. This is usually a planning condition with a planning permission, and was recommended for planning application 16/02850/OUTMAJ. The policy requires the submission of a contamination report, identifying any mitigation and remediation. The planning application 16/02850/OUTMAJ did not raise any viability issues in respect of contamination, as reports submitted with the application did not preclude development.</p> <p>It is recognised that the site is in close proximity to the M4. Given the restraint on the location of housing, to the west of the pylons, the buffer, together with some landscaping, should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p>
Ollie Aylett (lpr2)	<p>Concerning the re-development of the Old Sewage Works at the end of Blossom Lane.</p> <ol style="list-style-type: none"> <li>1. According to Dominic Smith of Thames Water and Steve Barden of Kennet Properties, the soil is heavily contaminated with heavy metals, such that the land is not even fit for animal grazing. It is, therefore, unfit for human habitation.</li> <li>2. Also according to Dominic Smith of Thames Water and Steve Barden of Kennet Properties there are unrecorded, underground pockets and chambers of toxic gas on the site, with an associated risk of subsidence, such that the land is dangerous even for animal grazing. It is, therefore, unfit for development.</li> <li>3. The land is currently a site of natural beauty and a wildlife habitat for many protected species, to include: bats, hedgehogs, common lizards, grass snakes, slow worms, water voles, dormice and overwintering birds such as house sparrow, tree sparrow, starling, song thrush and yellow wagtail which are protected either protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); are listed on Birds of Conservation Concern (BoCC) Red or Amber lists; are UK BAP Priority Species.</li> <li>4. Due to existing parking, access to the site via Blossom Lane and Crown Lane is restricted to a single track, with vehicles often having to back up to allow oncoming traffic. It is, therefore, unsuitable for daily use by an additional 70 homes with the potential for 140 more cars. The roads would be gridlocked, access and egress for the residents along the lane abutting the sewage works would be</li> </ol>	<p>Comments noted.</p> <p>Environmental Health officers note that there is a high risk of contamination at the site. This does not necessarily rule out development, and investigation, plus any remediation and possible future monitoring may be required. This is usually a planning condition with a planning permission, and was recommended for planning application 16/02850/OUTMAJ. The policy requires the submission of a contamination report, identifying any mitigation and remediation. The planning application 16/02850/OUTMAJ did not raise any viability issues in respect of contamination, as reports submitted with the application did not preclude development. There may be potential for localised areas of ground contamination. Localised capping of some made ground soils may be warranted.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways</p>

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	<p>permanently blocked in, with no available access for police, emergency and service vehicles.</p> <p>5. Due to the narrow and uneven pavements, Blossom Lane and Crown Lane roadways are shared with the following vulnerable groups: walkers (especially dog walkers), cyclists, horse riders, carriage drivers, people pushing golf trolleys, prams, pushchairs and people using mobility frames and mobility scooters. Increased traffic from a potential 140 more cars would obstruct their access and egress and represent a major threat to their personal safety.</p> <p>No development of the old sewage works at Blossom Lane.</p>	<p>Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p>
David Addis (lpr23)	<p>70 homes are proposed on the site of the old Theale sewage works. This would be accessed off Blossom Lane.</p> <p>The access from Blossom Lane and indeed to there off Englefield Road is totally insufficient, especially considering the existing traffic to and from the primary school.</p>	<p>Comments noted.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p>
Elaine Morrall (lpr89)	<p>The development of this site would require access along Crown Lane and Blossom Lane. These roads are already congested with residents parking and in effect are single track roads. They would not be able to support the increase in traffic to support 70 dwellings, let alone the construction traffic. The pavements along these roads are narrow and in some places non-existent meaning that pedestrians are often walking in the road. There is also an offshoot of Crown Lane. Where this joins the main section of Crown Lane vision is already restricted by the limited splays which are not in line with current guidelines and can't be increased due to the lack of residents parking. An increase in traffic would make it more dangerous for traffic</p>	<p>Comments noted.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be</p>

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	<p>exiting this minor road. The traffic from the road is also likely to increase given the recent planning permission for flats for 19/19a High Street.</p> <p>If the former sewage works site is to be developed alternative access needs to be sought through Whitehart Meadow</p>	<p>set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p>
Ollie Aylett (lpr364)	<p>Repeat of lpr2 + 6. It is a flood risk.</p>	<p>See also response to LPR2 above.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p>
Diana Spence (lpr1022)	<p>I wish to raise my objections to the following proposals for yet more development in Theale village. This is despite the fact that you have already given the OK to build 400+ homes on the western side of Theale. We do not want Theale to become a town like Thatcham – we want to remain a village. <u>70 homes on old Theale Sewage site</u></p> <p>My objection is: the very congested access via Blossom Lane and Crown Lane.</p> <p><u>General objections</u> to the above (including 100 homes on Whitehart Meadow) – do you ever take into account the pressure large development will cause to the already over subscribed Theale Medical Centre and the increased traffic. (We don't all ride bikes).</p> <p>Lastly, I know this view will not count, but can't we leave some field space for the deer to roam – we have already taken acres away from them and they were here first?</p>	<p>Comments noted.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>In relation to infrastructure the IDP sets out the infrastructure requirements.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p>
Lisa Cox (lpr1249)	<p><u>RSA 16 &amp; 17</u> WBC have already approved 425+ dwellings at the opposite end of the village with no regard for improvements to the infrastructure that cannot cope. The Primary School and Doctors Surgery are already at capacity, drainage and sewerage facilities need updating.</p> <p>There are a lack of community facilities such as a leisure centre (nearest one is not accessible by public transport routes and requires a car to access it) or community hub.</p> <p>I firmly believe WBC need to see and assess the effect the already approved dwellings have on the village and its infrastructure before designating further land to housing.</p> <p>This land could be used for the community facilities the village is desperately needing and WBC should give that consideration rather than its current proposal.</p> <p>RSA 16 &amp; 17 – consider this land for use to deliver community facilities</p>	<p>Comments noted.</p> <p>In relation to infrastructure the development the development may not be large enough to justify the provision of a community hub or leisure centre. Infrastructure requirements are set out in the IDP.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>The site has been promoted for residential development, and the Council is duty bound to identify and assess housing and economic land to meet targets for delivery. There are no allocations for community uses.</p>

Respondent (with lpr ref)	Response	Council Response
Ami Painter (lpr1261)	<p>I would like to submit my objections to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and the open land situated near Junction 12 EMP6.</p> <p>The area of Theale on the opposite side of the A4 to Arlington should be kept to the existing residential areas and not be expanded for the above reasons. In addition to this, there are already office and commercial sites in both Arlington and the Station Road areas where buildings are sat empty with no companies taking up the leases. With the increase in home working and out of town warehouse sites, it would not be appropriate to impact the local environment and put stresses on the local highways by adding unnecessary commercial properties, where there are already redeveloped sites across Theale that are not in use and have been sat empty for some time.</p> <p>The green spaces of Theale should be left as such before the village becomes an overdeveloped struggling area of West Berks that merges into Reading Borough Council, with facilities and resources that are not fit for purpose and drives existing residents away for the sake of building on land for financial gain and not considering the people, environmental and highway impacts it would have.</p>	<p>Comments noted (relating only to the Sewage Treatment Works. The comments relating to Whitehart Meadow are considered under responses to RSA16, and for the employment site THE8 under SP21).</p> <p>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping.</p>
Beth Pert (lpr1288)	<p>I would like to submit my objections to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and the open land situated near Junction 12 EMP6.</p> <p>The plan includes the following:</p> <p>100 homes on Whitehart Meadow (the area of land between the Woodfield Way estate and the M4)</p> <p>70 homes on the site of the old Theale sewage works (the far end of Blossom Lane).</p> <p>20,000 square metres of new office space on the field next to M4 Junction 12.</p>	<p>Comments noted (relating only to the Sewage Treatment Works. The comments relating to Whitehart Meadow are considered under responses to RSA16, and for the employment site THE8 under SP21).</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>National Grid have advised the Council that there should be a buffer around the high voltage power lines. Guidance has been released which the developers will need to take into account, as per the criterion in the policy.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>I object to the draft for the following reasons (across all sites):</p> <ul style="list-style-type: none"> <li>• Flood risk</li> <li>• High voltage overhead power lines cross the site</li> <li>• Noise and pollution from the motorway</li> <li>• Possible land contamination</li> <li>• Need to preserve the gap between Theale and Calcot/Tilehurst</li> <li>• Impact on the Area of Outstanding Natural Beauty</li> <li>• Risk from fluvial, surface water and ground water flooding</li> <li>• Separated from the Arlington Business Park by the busy A4 Theale bypass</li> <li>• Impact on the Theale High Street Conservation Area</li> <li>• Impact on surrounding housing</li> <li>• Unsuitable access via single-track Blossom Lane and Crown Lane</li> <li>• The requirement for office space was based on a council commissioned study that was carried out before the covid 19 outbreak.</li> </ul> <p>As a resident of Theale, my objections are based on my experience of living in the village on and off for nearly 20 years.</p> <p>The basic infrastructure of the village cannot cope with a further 170 homes. The GP surgery is already stretched to breaking point and not able to provide a high standard of patient care for local residents. An extra 170 homes would see upwards of 350 patients. This would overwhelm the surgery completely. This is even more of an issue given that the residents of the homes currently under construction on Beansheaf side of the M4 will also be registering at Theale Medical centre when the properties are completed.</p> <p>The local primary school, which was built on land used for sports and recreation, is also near to capacity. Building more homes and bringing more families in to Theale will mean the school is no longer fit for purpose and will require further extension, taking up yet more valuable green land.</p> <p>Having lived in a flat with no useable outside space during the covid pandemic, it has become even more evident how important local green space is. Building on Whithart Meadow will take away precious green space</p>	<p>It is recognised that the site is in close proximity to the M4. The restraint on the location of housing and landscaping should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>The policy requires the submission of a contamination report, identifying any mitigation and remediation.</p> <p>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping.</p> <p>The Conservation Officer does not raise an objection to the proposal's impact on the conservation area.</p> <p>The development will be visible from existing dwellings, though planning policies are in place in the Local Plan to protect amenity. Sufficient distances shall be maintained and good design will be required. It is important that the development integrates with existing development, rather than as a stand alone development.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be</p>

Respondent (with lpr ref)	Response	Council Response
	<p>that is local to residents. The impact on our local wildlife would be irreversible too.</p> <p>The access to both sites is problematic. Woodfield Way is already very busy and with parked cars on both sides of the road, the road is already noisy and at times can be dangerous. As new homes are regularly built without sufficient parking, more cars would be using local access roads as a car park, thus increasing the noise, traffic and antisocial problems associated with on street parking. Blossom Lane has similar issues with the added problem of being very narrow. Construction traffic would cause a great deal of disruption to local residents too.</p> <p>Building on sites which have a risk of flooding seems incredibly short sighted, especially at a time where a change in our climate indicates an increased amount of annual rainfall. By building on these sites, there may be an increased risk to existing homes as well as any new homes.</p> <p>While I understand the need to more homes to ease the housing crisis, I feel better options are available. Commissioning further studies in to the regeneration of empty, dilapidated and part derelict office blocks and warehouses in to energy efficient homes would be more beneficial to the local community and saving our precious green space.</p>	<p>required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>In relation to infrastructure the development may not be large enough to justify the provision of a community hub or leisure centre. Infrastructure requirements are set out in the IDP.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p>
Jayne Dowe (lpr2097)	<p>I would like to comment that I do not support the areas proposed for development (<i>in Theale</i>) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The impact of additional traffic on the village. The proposed access route for Whitemeadow and the adjacent field is a major route used by pedestrians to access the footbridge over the motorway. Additional traffic will raise risks to pedestrians, particularly school children. The high street is narrow and already ill-equipped to deal traffic. The junction is already busy due to its proximity to the motorway, business parks and the A4.</li> <li>• Blossom Lane is a narrow quiet residential road, increased traffic would cause further risks and inconvenience.</li> <li>• The impact on the estates that will be adjacent to the development – Woodfield Way, Alderfield Close etc, leading to overcrowding, impact on view, traffic through the local area. This will impact on the living standards of existing residents.</li> </ul>	<p>Comments noted.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>It is recognised that the site is in close proximity to the M4. The restraint on the location of housing and landscaping</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• The development will reduce the protective barrier between existing homes and the motorway.</li> <li>• The negative impact on living standards in regards to the new developments being in extremely close proximity to the overhead power lines and the motorway, leading to poor air quality, noise pollution and poor living environment for potential 'new' residents.</li> <li>• The impact on services within Theale, which are already under strain, particularly at this time health services.</li> <li>• Reduction in the boundaries between Theale and Calcot.</li> <li>• All three locations are abundant with wildlife, whose habitat would be destroyed.</li> <li>• Much of the office space within Arlington business park is currently not in use, therefore it is unclear why further office space would be required. The visual impact of the structures will affect the outlook of the village on approach.</li> <li>• The continued development in these areas will continue to spoil the aesthetic of the village as a whole. There are already approved areas of significant housing development within Theale, if these additional areas are also approved the village will lose its character and become overcrowded, overrun by traffic and will have a significant negative impact on existing residents.</li> </ul>	<p>should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p> <p>National Grid have advised the Council that there should be a buffer around the high voltage power lines. Guidance has been released which the developers will need to take into account, as per the criterion in the policy.</p> <p>In relation to infrastructure the development may not be large enough to justify the provision of a community hub or leisure centre. Infrastructure requirements are set out in the IDP.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p> <p>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping.</p>
Harvey Fletcher (lpr1968)	<p>I object to the proposed development for RSA17 "former sewage works" on the following grounds:</p> <ul style="list-style-type: none"> <li>• Too close to M4 (noise pollution too much for housing)</li> <li>• Not enough access, all traffic would be sent down Blossom lane, which is a single lane track</li> <li>• The site is a flood risk</li> <li>• Housing would negatively impact area of natural beauty</li> </ul> <p>I do not want the proposed changes for RSA16 or RSA17 approved.</p>	<p>Comments noted.</p> <p>It is recognised that the site is in close proximity to the M4. The restraint on the location of housing and landscaping should soften the impact. As with the development at Dorking Way, which is closer to the road network, the policy will require a noise and air quality survey, with appropriate mitigation.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p> <p>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site. The policy contains criteria which guide development and associated landscaping.</p>
Meg Randall (lpr1441)	I am writing to oppose the recent plans made for housing and offices in whitehart meadow, Theale sewage works and the field next to the m4 junction 12. I believe it is of great importance to keep these few areas of wildlife we still maintain in Theale and for a village so quaint and with such character these unlikely areas contribute greatly to the feel of the village. In times like these we have learned how important nature is to a community such as the one in Theale. These areas are the only accessible walks within the village out of the way of houses and the only thing I believe can improve Theale would be more wildlife and walks! This has benefitted my mental health greatly as well as other people's and I strongly believe we need to	<p>Comments noted (in relation to the sewage treatment works).</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>maintain these natural and fascinating locations rather than expanding a village that has always thrived off of its old and quaint character. Thankyou for taking the time to read my email and I really hope you take this into consideration</p>	<p>As part of the proposals, and the landscaping assessment, the proposals would retain much of the existing open space and connect better with the existing public play space to the south. Links to public footpaths would be created.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p>
Kevin Aylett (lpr821)	<p>Objection to RSA17 Old sewage works, Theale Access road too narrow for extra volume of traffic Contamination of land from previous usage A habitat wild animals including deer and hedgehogs. Outside the settlement boundary Flood risk as shown on 2<sup>nd</sup> Feb flood alert map</p>	<p>Comments noted.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>Environmental Health officers note that there is a high risk of contamination at the site. This does not necessarily rule out development, and investigation, plus any remediation and possible future monitoring may be required. This is usually a planning condition with a planning permission, and was recommended for planning application 16/02850/OUTMAJ. The policy requires the submission of</p>

Respondent (with lpr ref)	Response	Council Response
		<p>a contamination report, identifying any mitigation and remediation.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>The site is currently outside of the settlement boundary. However, as part of the Local Plan Review additional sites are required and these necessitate an extension to settlement boundaries.</p> <p>The developable area would not be within Flood Zone 2, and the policy includes a criterion that no development would be permitted in this area. A FRA and SuDS scheme would also need to accompany a planning application.</p>
J Painter (lpr2015)	<p><i>(Response to RSA16, RSA17, EMP6. Included text relevant to RSA17).</i> I am objecting to the Local Plan Review 2020 -2037 Emerging Draft December 2020 in relation to the sites Whitehart Meadow (RSA16), the Old Sewage Works (RSA17) and land situated near Junction 12 EMP6.</p> <p>I am a resident of Theale of over 20 years and have seen the impact that several developments over this time has had on the infrastructure of the village.</p> <p>Theale Medical Centre struggles to provide adequate facilities for the 10,000+ patients it has over the Theale and Calcot areas. With the proposed 170 properties to be built in the Surgery's geography, the impact on the current patient levels and care provided will be detrimental. This would be in addition to the already growing numbers of patients given the development site that is currently being built opposite the Sainsbury's retail site near Junction 12 in Calcot, who will also be served by Theale Medical Centre.</p>	<p>Comments noted (in relation to the sewage treatment works).</p> <p>In relation to infrastructure the development may not be large enough to justify the provision of a community hub or leisure centre. Infrastructure requirements are set out in the IDP.</p> <p>The Education Authority comment that mitigation may be needed to absorb the additional pupils, and avoid displacement of existing families.</p> <p>The Highways Authority identify that improvements would be required to Blossom Lane to allow appropriate access, and would be deemed suitable in principle. The Highways Authority comment that the impact of the trips from the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Theale Primary School also had to be redeveloped onto a new site on North Street playing fields, which meant local footballs teams and the community lost open space to play on and use for recreational purposes. The impact of 170 new homes would mean more residents would not have enough space for recreational use, as well as new families moving into the village putting pressure onto the primary school, which is becoming quickly overwhelmed with the number of pupils it already has.</p> <p>The local highways in Theale would also not be able to cope with the increase in traffic across all sites. As a resident of Woodfield Way, there have been numerous times where the access to this part of Theale has been blocked due to traffic issues along the A4 and M4. The High Street is often used as a cut through when the bypass is at a standstill and this means local residents are either trapped in the village unable to leave, or unable to access their homes due to the volume of traffic. As there is only 1 access point for the Woodfield Way area of Theale, increasing pressure on this site with the addition of 100 home and 20,000 sqft of commercial property will cause not only disruption to those who live in these areas, but will also increase the impact on the environment with more vehicles and the pollution it will cause.</p> <p>The increase in numbers of vehicles will also cause issues given the current problems experienced with restrictions in access around the Woodfield Way/High Street area. Commercial units at the top of Woodfield Way park their vehicles outside of their units, and residents who have multiple vehicles use the roads to park their cars/vans which narrows the road access. There is constantly a risk that emergency services would not be able to get to the properties furthest down Woodfield Way due to the current number of vehicles that use the roads as a car park. Adding 100 homes, with the same number if not more cars/vans etc. would be more than the local highways would be able to cope with.</p> <p>Now more than ever the open green land of Theale should be left as such, as it allows the community the ability to take exercise without travelling which is key given the current pandemic. To lose this land would also impact on the natural habitats of the wildlife living there, which will displace many animals. Trees have already been cut in the Whitehart Meadow site, and this has caused an increase in light and noise pollution from Junction 12, IKEA</p>	<p>development to Blossom Lane and Crown Lane would not find an objection. A transport assessment would be required to assess the impact on Blossom Lane leading into Theale. Such investigation and mitigation would be set out in the policy. Further work was undertaken as part of the planning application 16/02850/OUTMAJ where access issues were overcome.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p> <p>As part of the proposals, and the landscaping assessment, the proposals would retain much of the existing open space to the east and connect better with the existing public play space to the south. Links to public footpaths would be created.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>It is important for the development (and taking into account Whitehart Meadow) to respect the character of the area, the gap between Theale and Calcot, and the setting of the AONB. Landscape work has been commissioned and has recommended development is focused to part of the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and its car park along with the overnight roadwork noises from the smart motorway works. Placing 100 properties on this land would be detrimental to those who live next to and opposite the site due to the disruption the development would cause on both the residents and highways, along with it being built on a site of flood risk and uncomfortably close to the overhead power lines/pylons situated in the land.</p> <p>Lastly, with building on the proposed sites, the gap between Theale and Calcot/Tilehurst will significantly decrease. Theale is already situated in a difficult location where emergency services are pulled from opposite towns to the furthest reach of their geography to attend to us. Both Reading and Newbury Police and Ambulance crews find it difficult to attend as we are approx. 10 - 15 miles from each local station for crews to be sent. By adding more residential and commercial sites to Theale this will add increasing pressure to services such as blue lights which is already stretched given our location and the current pandemic situation.</p> <p>For the above reasons, in addition to a site already marked for development along The Green near the Tidmarsh/A4 end of Theale, I object to the local plan review 2020 - 2037 covering sites Whitehart Meadow, The Old Sewage Works and the open land besides the A4 and M4 opposite Whitehart Meadow.</p> <p>I hope this objection will be well considered along with the areas of Theale that are already over developed and struggling to cope with the current population of the village.</p>	<p>The policy contains criteria which guide development and associated landscaping.</p> <p>There is no identified issue with emergency services.</p>
<b>Landowners, site promoters and developers</b>		
<p>Pegasus Planning Group Ltd for Calcot Park Golf Club (lpr2331)</p>	<p>(Full representations in SP14) The policy (SP14) lists a number of sites of varying sizes, which are proposed to be allocated for residential development. It is considered that some of these sites are not ideally suited or justified and they should be removed from the list. In particular, the following:</p> <ol style="list-style-type: none"> <li>1. RSA 16 – Whitehart Meadow, Theale (Site Ref THE1)</li> <li>2. RSA 17 – Former Theale Sewage Treatment Works, Theale (Site Ref THE7)</li> </ol>	<p>Comments noted, in relation to the sewage treatment works.</p> <p>The Local Plan is landscape-led. Since the publication of the Local Plan Review (LPR) further landscape work has been undertaken, as part of a Landscape Sensitivity and Capacity Assessments (LCA) for a number of sites in the LPR. The Sewage Treatment Works is subject of a LCA. The LCA identifies a number of landscape receptors which could be affected by development on site.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>All of these sites are small and currently in use as open fields. Although they each adjoin the edge of a settlement, they offer very limited opportunities for landscaping, as well as biodiversity and geodiversity net gain. The plans in the local plan show they have issues with flooding, motorway noise or they are 95% covered in new development with a narrow “landscaped buffer” on the site edges. These sites are less suitable for allocation and they are poor choices for new housing to help meet the local need in the next few years than that proposed at Calcot Park Golf Club (CPGC).</p> <p>This policy states that this site should be allocated in the local plan for 70 dwellings. The plan shows only a red line around the site. No “landscape buffers” are shown on the plan, so it must be assumed that these boundary treatments will be weak and ineffective. Such unsubstantial boundary treatments will not provide the 10% bio and geodiversity net gain required by policy SP11. Also, they will not provide the level of landscape and visual impact mitigation that is required by policy SP10. Boundary screening will be especially important in this location, which is low-lying land to the north of Theale, which will be visible in several long-distance views. A large part of the site will be sterilised by high voltage cables running across it. In addition, the area is known to be very low-lying and liable to flooding, as well as being close to the M4, which will create problems of noise and air quality.</p> <p>An application for development of 88 dwellings was made in 2017, ref: 16/02850/OUTMAJ, but was withdrawn further to objection from Highways Officers in respect of substandard road access and width, as well as concerns raised in respect of landscape and visual impact. It is considered that on the basis of the quantum of dwellings still proposed, it is unlikely that a technical solution can be found that would deliver development as envisaged.</p> <p><i>Policy RSA 17 – Former Sewage Works, Theale (Site Ref: THE7) in its current form should be removed from the local plan, because the site is not suitable for residential development. Alternatively, the proposed allocation should be reduced in quantum to a level that can be technically</i></p>	<p>It is recommended to limit the developable area, and to retain landscaped buffer areas to retain the immediate planted landscape setting. The development should be designed as a positive extension to the settlement pattern of Theale, by providing an attractive façade to the public open space to the south. Tree planting will be needed to break up the development form. Such buffer planting and design parameters (such as two storey dwellings) should aid in maintaining the wooded view from the AONB, as well as screening the M4.</p> <p>The Spatial Strategy for West Berkshire promotes development on three spatial areas: Newbury and Thatcham, Eastern Area and North Wessex Downs AONB. Theale is included in the Eastern Area and is a sustainable location, with good public transport links and active travel links. Theale, as a Rural Service Centre, is identified as a focus for additional housing through existing commitments and new allocations.</p> <p>The draft policy for the site allocation did not include detail on policy criteria or mapping. This will be done for the submission version of the plan. Landscaping is an important part of the development, particularly given the setting of the AONB and in recognition of the gap between Theale and Calcot. The recommendations of the LCA are to be built in to the policy criteria.</p> <p>An ecological survey will need to be provided with a planning application, together with avoidance and mitigation measures. The development design should also aid in retaining habitat, including the buffer to the Sulham Brook and extensive amounts of landscaping and tree planting.</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	<i>accommodated taking into consideration known site access and landscape matters</i>	Application 16/02850/OUTMAJ was withdrawn. Access and landscape issues had been overcome.

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR Policy: RSA18 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA 15)**

**(Proposed Submission LPR Policy: RSA12 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common)**

Number of responses received: 8

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Burghfield NDP Steering Group (lpr473)	<p>The Burghfield Neighbourhood Development Plan Steering Committee support the parameters:-</p> <p>Ensure a 15m buffer to ancient woodland and retain existing woodland on the site.</p> <p>Provide footpaths and cycleways to serve the site, enabling connections to the existing network of footpaths and local routes in the surrounding housing areas to increase permeability.</p> <p>Protect the water course along the south eastern boundary of the site. This is because these facets of development have been specifically identified during the work to produce an NDP.</p> <p>The Burghfield Neighbourhood Development Plan Steering Committee would like to add a buffer of trees between the housing and Clayhill Road.</p>	<p>Comments noted. However, no changes to the policy are required in light of this representation because the policy already refers to the need for the development scheme to protect and strengthen landscaping.</p>
Environment Agency (lpr1670)	<p>An ordinary watercourse forms the south eastern boundary of the site. We would therefore require a minimum 5m wide undeveloped buffer zone adjacent to this watercourse as well as an ecological assessment including protected species surveys.</p>	<p>Comments noted. The policy already refers to protecting the watercourse, but reference to a buffer zone will be added to the policy as follows –</p> <p>‘Protect the water course <u>with a 5m buffer zone</u> adjacent to the watercourse along the south eastern boundary of the site.’</p>

Respondent (with lpr ref)	Response	Council Response
Historic England (lpr1576)	We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted. No further changes to the policy are required in light of this representation.
Natural England (lpr1605)	<p>This allocation proposal serves to add a significant green infrastructure disconnect between two areas of ancient woodland - Clayhill Copse and Pondhouse Copse. A housing development of approximately 100 dwellings would serve to cut off the connectivity between the woodlands, as well as be likely to cause edge effects on the woodlands from increased vehicle traffic and pedestrians.</p> <p>Para. 174 of the NPPF states that Plans should ‘promote the conservation, restoration and enhancement of priority habitats, ecological networks...’, and para 175 (c) states that ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’.</p> <p>Any future planning application will have to show how it will mitigate for the impacts on the woodlands, and how green infrastructure through the development will help to alleviate the disconnect.</p>	<p>Comments noted. The wording in the policy referring to ancient woodland will be strengthened as follows –</p> <p><del>‘Ensure a 15m buffer to ancient woodland and</del> <u>Retain existing woodland on the site and provide an appropriate buffer of at least 15 metres between the development and the areas of ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development’</u></p>
Thames Water (lpr1763)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the</p>	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p> <p><u>‘An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.’</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p> <p>Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.</p>	
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1877)	<p>MWBLAF supports the following statements in these policies:          Provide footpaths and cycleways to serve the site, enabling connections to the existing network of footpaths and local routes in the surrounding housing areas to increase permeability. (RSA 18)          Explore options to provide footpath and cycle links to existing and proposed residential development to increase permeability to other parts of Burghfield Common. (RSA 19)          However, it is unclear from the definitive map and street gazetteer what is the 'existing network of footpaths' referred to in RSA 18.</p>	<p>Comments noted. The policy will be amended to strengthen and clarify the requirements in relation to footpath and cycle links as follows –</p> <p>'Provide footpaths and cycleways to serve the site, enabling connections to the existing network of footpaths and local routes in the surrounding housing areas to increase permeability <u>and to ensure that residents of the site can access school provision in Burghfield Common via accessible, safe and sustainable transport options.</u>'</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr976)	Policy is supported.	Support noted
<b>Landowners, site promoters and developers</b>		
Savills on behalf of Englefield Estate (lpr1535)	<p>The LPR Emerging Draft proposes to carry forward a significant number of site allocations from the Housing Site Allocations DPD (HSA DPD), including two sites owned by the Englefield Estate at The Green, Theale (HSA DPD ref. HSA14) and at Pondhouse Farm, Burghfield Common (HSA DPD ref. HSA15). As noted above, the intention to carry forward these two sites is</p>	<p>Comments noted. No changes are required in light of this representation.</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	welcomed. It is noted that the new draft LPR Policies RSA15 (Land between A340 and The Green, Theale) and RSA18 (Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common) are identical to HSA DPD Policies HSA14 and HSA15.	

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR Policy: RSA19 Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44 Lamden Way, Burghfield Common (Site Ref: HSA 16)

Number of responses received: 7

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Burghfield NDP Steering Group (lpr474)	<p>The policy is supported.</p> <p>The Burghfield Neighbourhood Development Plan Steering Committee support the parameters:-</p> <p>Reflect the semi-rural edge of Burghfield Common through appropriate landscaping.</p> <p>Provide a buffer of 15 metres to the areas of ancient woodland to the west of the site and provide appropriate buffers to the rest of the TPO woodland.</p> <p>Provide an appropriate landscape buffer on the part of the site that is adjacent to The Hollies to minimise any impact on the residents.</p> <p>Explore options to provide footpath and cycle links to existing and proposed residential development to increase permeability to other parts of Burghfield Common.</p> <p>This is because these facets of development have been specifically identified during the work to produce an NDP.</p>	<p>Comments noted.</p> <p>The allocation will be removed from the Local Plan Review following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as development had not yet been built out.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPIR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.</p>

Respondent (with lpr ref)	Response	Council Response
Environment Agency (lpr1671)	The same ordinary watercourse that forms the south eastern boundary of RSA 18, is a short distance from the western boundary of the site. But as the woodland is to be retained, this should form an adequate buffer to the watercourse.	<p>Comments noted.</p> <p>The allocation will be removed from the Local Plan Review following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as development had not yet been built out.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.</p>
Thames Water (lpr1764)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website.	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared.</p> <p>The allocation will be removed from the Local Plan Review following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as development had not yet been built out.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency</p>



Respondent (with lpr ref)	Response	Council Response
	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.	Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised. The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1878)	MWBLAF supports the following statements in these policies: Provide footpaths and cycleways to serve the site, enabling connections to the existing network of footpaths and local routes in the surrounding housing areas to increase permeability. (RSA 18) Explore options to provide footpath and cycle links to existing and proposed residential development to increase permeability to other parts of Burghfield Common. (RSA 19) However, it is unclear from the definitive map and street gazetteer what is the 'existing network of footpaths' referred to in RSA 18.	Comments noted.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr977)	Policy is supported.	Support noted.
<b>Landowners, site promoters and developers</b>		
Pro Vision on behalf of TA Fisher & Sons Ltd (lpr1934)	Policy is supported. The land allocated by Policy RSA19 is roughly divided up on the indicative map into four parcels. Our client has an interest in the three most western parcels of land labelled "RSA19". The eastern parcel of land labelled "RSA19" is owned by, and being brought forward by Crest Nicholson. The site's recent planning history relates to the eastern parcel of land i.e. not the land in which our clients have an interest.	Comments noted. The allocation will be removed from the Local Plan Review following objections by Emergency Planning. The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had

Respondent (with lpr ref)	Response	Council Response
	<p>Table 9.1 of the Council's Site Selection Background Paper (December 2020) provides the Council's deliverability update.</p> <p>The only comments that we have in relation to the Council's deliverability update is to confirm that the land in which our client has an interest does not yet benefit from planning permission. Nonetheless, it will be brought forward as a separate and subsequent phase to the eastern land. The land is however considered deliverable and available, being within the control of a local house builder.</p> <p>Regarding Policy RSA19 of the draft Local Plan, our only comments relate to confirming that the remaining number of dwellings allocated by Policy RSA19 (32 out of the allocated "approximately 60 dwellings") can be achieved on the western land. This land will be brought forward in line with the requirements of Policy RSA19 and remains deliverable.</p> <p>With reference to Policy SP4 of the draft Local Plan, it is noted that the site falls within the Atomic Weapons Establishment (AWE) Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield, as identified by Figure 4. Policy SP4 explains that "In the interests of public safety, residential development in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) has advised against that development."</p> <p>However, as the site is a retained allocation, the principle of residential development should remain acceptable.</p> <p>We note the conclusion of the Council's Site Selection Background Paper in relation to Benhams Farm (ref. SUL1), where that site was not recommended for allocation for the following reason: "Following the recent review of the DEPZ, the Council's Emergency Planning Team has advised that the site should not be allocated. This follows on from the Office for Nuclear Regulation (ONR) indicating that on the basis of its current model for testing the acceptability of residential developments around the AWE sites, it would advise against nearly all new residential development within the DEPZs."</p> <p>Our client's land however has been re-allocated for development in the draft Local Plan. Therefore, the delivery of housing at the site remains acceptable despite the revision to the AWE consultation zones. We support this view. In</p>	<p>been proposed to retain the allocation in the LPR as development had not yet been built out.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>summary, it is concluded that the development allocated in Policy RSA19 of the draft Local Plan has already been factored into AWE Burghfield's emergency planning.</p> <p>It is also noted that the site falls within the Outer Consultation Zone (OCZ) for AWE Aldermaston, as identified by Figure 3 of the draft Local Plan. The table provided in Policy SP4 outlines the consultation arrangements for applications within the OCZ. In reviewing this it does not appear that the proposals for the site would trigger the need for consultation with the ONR.</p>	
<p>John Cornwell on behalf of Messers I. Cheshire, R. Shaw and The Russell Trust (lpr1647)</p>	<p>Policy is supported.</p> <p>These submissions are made on behalf of the above landowners who own land on the southern part of the adopted housing allocation Ref: HSA16 Phase 1 of this allocation, at the northern end, is currently nearing construction completion by Crest Homes Plc. The above landowners together own the southern Phase 2 part of this allocation for circa 30 or so dwellings.</p> <p>The area of land owned by the above landowners has dwelling capacity for 30 or so new dwellings (depending on the final approved layout). The Phase 1 Crest scheme is now nearly complete, with the estate access road in to sub-base level up to the boundary of the Phase 1 and Phase 2 sites.</p> <p>The above landowners are in the final stages of entering into a Development Agreement with T A Fisher Homes of Reading to develop Phase 2. The great majority of technical assessments and surveys for this work have already been carried out, and a significant amount of civil engineering work has been undertaken to devise the most appropriate estate road route through the site, given the levels differences across it.</p> <p>The only outstanding technical requirement is the updating of the Phase 1 Habitats Assessment carried out in 2015 by GreenLink Ecology Ltd. That assessment found evidence of common reptiles which will need translocating before any development takes place. The update cannot take place until mid-April to allow for revised bat surveys. It is therefore anticipated that a detailed planning application for this land will be submitted around July 2021.</p> <p>The land is therefore very well placed to commence implementation late 2021, and be completed during 2022.</p>	<p>Comments noted.</p> <p>The allocation will be removed from the Local Plan Review following objections by Emergency Planning.</p> <p>The site was included as an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. At Regulation 18 it had been proposed to retain the allocation in the LPR as development had not yet been built out.</p> <p>At the time of the preparation of the HSA DPD, Council Emergency Planners allowed for the 60 units. However, since 2019 the Government advised following further technical research that the inner Detailed Emergency Planning Zone (DEPZ) for the Burghfield Atomic Weapons Establishment (AWE) site under the REPPiR Radiation [Emergency Preparedness and Public Information] Regulations 2019 be revised.</p> <p>The site lies in the inner DEPZ of AWE Burghfield. Development will increase the population density of the area, which will inevitably compromise the effectiveness of emergency evacuation procedures in the event of an incident at the AWE. There is potential harm to future public safety.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA20 Land North of A4 Bath Road, Woolhampton****(Proposed Submission LPR Policy: RSA13 Land North of A4 Bath Road, Woolhampton)**

Number of responses received: 6

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Midgham Parish Council (lpr183)	<p>At a meeting of the Parish Council on the 18th January 2021 the local plan was discussed, together with a recent planning application 20/03028/OUTMAJ - Junction Bath Road and New Road Hill. The observation sheet was forwarded to planning today stating that the PC object and provided the reasons why.</p> <p>With regards to the possible inclusion of the New Road Hill site in the new Local Plan we wish to clarify the parish council's objections.</p> <p>This would be building on a greenfield site in the countryside.</p> <p>The proposed site is well outside the settlement boundary and in fact abuts the Woolhampton settlement boundary. Therefore this would be a ribbon development which would be inappropriate to preserving both the Woolhampton village and the Midgham village.</p> <p>Access onto the A4 main road would be difficult and potentially dangerous.</p>	<p>Comments noted.</p> <p><u>Development on greenfield land:</u> Policy SP1 (Spatial Strategy) of the emerging draft Local Plan Review (LPR) makes it clear that in order to meet the Council's housing requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p><u>Settlement boundary / ribbon development:</u> The northern and eastern boundaries of the site adjoin the settlement boundary of Woolhampton. The settlement boundary review criteria set out in Appendix 3 of the emerging draft LPR</p>

Respondent (with lpr ref)	Response	Council Response
		<p>make clear that sites allocated through the Local Plan and Neighbourhood Plan process will be included within the settlement boundary.</p> <p>The site is contained on its western boundary by woodland. Immediately south of the site is residential development, a community centre, and allotments. To the north of the site lies residential development. The nature of the proposals will not result in ribbon development.</p> <p><u>Access:</u> The Council's Highways team have not raised any objections to an access from the A4 Bath Road.</p>
Historic England (lpr1577)	<p>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</p> <p>We recommend a policy requirement for proposals to be informed by an archaeological desk based assessment and, subject to the results of the DBA, a field evaluation, in accordance with NPPF paragraph 189.</p>	<p>Comments noted. To address Historic England's comments, the policy will include a requirement for an archaeological desk based assessment and, subject to the results of the assessment, a field evaluation.</p> <p>The requirement in the policy will read as follows: <u>'A desk-based assessment to better understand archaeological potential and survival will be required, and subject to the results of the assessment, a field evaluation.'</u></p>
Thames Water Utilities Ltd (lpr1755)	<p>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</p> <p><b>Water response:</b></p>	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste Response:</b> The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p>	<p><u><i>An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. All sites that are not connected to the mains sewerage system will ensure there are no deleterious effects to Special Areas of Conservation (SACs) and river and wetland Sites of Special Scientific Interest (SSSIs).</i></u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>General consultation bodies</b>		
Heritage Forum (lpr86)	RSA20. The correct name of the road is New Road Hill. The development of 14 houses on land on this road and north of the A4 has recently been turned down because of the dangerous access.	<p>Comments noted. References in the site LPR, selection background paper and the HELAA to 'New Hill Road' will be amended to read 'New Road Hill'.</p> <p>This site has been subject to two planning applications for 16 dwellings – 19/01942/OUTMAJ (refused) and 20/03028/OUTMAJ (pending determination). In both applications access was proposed from the A4 Bath Road. The Council's Highways Team did not raise any objections to access.</p>

Respondent (with lpr ref)	Response	Council Response
		The Council's Highways Team have been consulted as part of the preparation of the LPR and they have not raised access concerns in relation to this site.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr978)	Support for allocation	Support for allocation noted.
<b>Landowners, site promoters and developers</b>		
Woolf Bond for JPP Land Ltd (lpr2076)	<p><i>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</i></p> <p><b>Introduction</b></p> <p>We refer to the above consultation event and respond on behalf of our client, JPP Land Ltd. Our client's interests relate to land located north of Bath Road, Woolhampton. The site has a significant planning history, including its previous identification as a preferred allocation within the Draft Housing Site Allocations Local Plan (preferred option 15 – site ref WOOL001). This draft allocation indicated that the 0.83ha site could accommodate approximately 20 dwellings.</p> <p>It is acknowledged that within the current Emerging Draft Local Plan, our client's land is included as a proposed allocation for 20 dwellings (site ref RSA20) in policies SP14 and RSA20. We concur with the Council that the site is suitable for allocation, as assessed in the Sustainability Appraisal of Site Options alongside Appendix 4e of the Site Selection Background Paper. The suitability of the site for residential development is further demonstrated by the technical evidence that has been submitted to the Council as part of the current planning application for 16 dwellings on the site (ref 20/03028/OUTMAJ). Therefore, we reconfirm that the 0.83ha site is suitable for housing development comprising between 16 and 20 dwellings in a sustainable location as an extension to the settlement of Woolhampton. The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period. This is supported by the Technical evidence which accompanies the current planning application.</p>	<p>Support for allocation noted.</p> <p>The site was promoted as part of the 'call for sites' for the Council's HELAA. To determine the development potential on sites proposed for residential uses, the West Berkshire Density Pattern Book Study was used.</p> <p>Regulation 18 is an early stage of a plans preparation, and as further evidence is produced and technical data becomes available, numbers will be refined.</p> <p>Since the Regulation 18 consultation, technical data has been submitted by the applicant which indicates that 16 dwellings is achievable on the site. This has taken into account matters such as the buffer for the ancient woodland and pipeline easements.</p> <p>The development potential on the site will therefore be amended down from 20 to 16 dwellings.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>National Planning Policy Framework (NPPF) and the Tests of Soundness</b></p> <p>The NPPF (February 2019) sets out the principal components to be included in local plans. Paragraph 35 requires that in order to be “sound” a Development Plan Document (‘DPD’) should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified the DPD must be founded upon a proportionate evidence base and represent an appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the Statement of Common Ground.</p> <p>The positive preparation test requires plans to as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical.</p> <p>For the reasons set out in these submissions there are a number of potential matters that need to be addressed in future iterations of the emerging Plan. These are outlined following the relevant questions and supporting information within the consultation document.</p> <p><b>The Vision Statement</b></p> <p>In our response to the earlier draft version of the Local Plan (December 2018), we highlighted our concern regarding the inconsistency of the Council’s proposed vision with the approach of the NPPF, particularly paragraph 78). This related to the failure of the proposed vision to effectively support growth in villages. The revision to the vision (particularly the second paragraph) which includes references to both towns and villages is therefore consistent with national advice, as is the allocation our client’s land north of Bath Road, Woolhampton.</p> <p><b>Further matters – Comments on draft Policy RSA20 regarding the allocation of land north of Bath Road, Woolhampton</b></p> <p>The draft policy indicates that the site is proposed to be allocated for a residential development comprising approximately 20 dwellings. On behalf of our clients, an outline application for the erection of 16 dwellings has been submitted and is currently under consideration by the authority (20/03028/OUTMAJ). This followed an earlier outline application (19/01942/OUTMAJ) for 16 dwellings on the site which was refused by the authority. The Council’s determination of the earlier application together with the technical information submitted with the current scheme highlight those matters which are most likely to be relevant for inclusion in a policy for the development of the site.</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>In contrast, the assessment of the site for the Local Plan (through both the 2020 HELAA and the Site Selection Background Paper (December 2020)) have unjustifiably identified other issues which should not be detailed in any policy for the development of the site.</p> <p>The technical information submitted with the current application confirms that development of the site could proceed with mitigation to address any potential impacts upon the adjoining Local Wildlife Site. The inclusion of a 15m buffer along the site's western boundary ensures development of the site also safeguards the ancient woodland which is the designated Local Wildlife Site. This is shown on the illustrative layout submitted with the application [see attachment].</p> <p>A review of the Council's published Housing Economic Land Availability Assessment (HELAA) 2020 in light of the current planning application scheme reaffirms the suitability, deliverability and availability of the site.</p> <p>The site was one of five sites assessed in Midgham Parish, three of which lie on the edge of Woolhampton. The conclusion of the Assessment is that the site is the only site with development potential at Woolhampton. The suitability of the site is acknowledged in the December 2020 update on the HELAA, which re-affirms that it is the sole site at Woolhampton with development potential. As to the site itself, the Assessment assumes a density of 30 dwellings per hectare which contrasts with the more sensitive and agreed lower density of 19.4 dwellings per hectare proposed for the application scheme. Accordingly, the HELAA Assessment should be seen in this light. The HELAA looks at:</p> <ol style="list-style-type: none"> <li>1. Development potential;</li> <li>2. Suitability;</li> <li>3. Availability;</li> <li>4. Achievability; and</li> <li>5. Deliverability Each is addressed in turn below.</li> </ol> <p><b>1. Development potential</b></p> <p>The first section of the HELAA deals with development potential. The Assessment highlights site specific issues which could affect capacity as relating to the ancient woodland and the need for a buffer. The illustrative application scheme includes such a buffer, consistent with Natural England guidelines, with a depth of 15 m. In withdrawing reason for refusal 3 in connection with the previous application, the Council now confirms that the site can be developed without harm to the ancient woodland. The Assessment assumes a density of 30 dwellings per hectare and an estimated development potential of 20 dwellings. This contrasts to the more sensitive and agreed lower density of 19.4 dwellings per hectare and the 16 dwellings proposed.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><b>2. Suitability</b></p> <p>Under relevant planning history, the HELAA Assessment confirms no relevant planning applications but records the site being assessed as “potentially developable” in the 2013 strategic housing land availability assessment as recorded above. The Council’s assessment notes that:</p> <p>“During the site selection work for the Housing Site Allocations Development Plan Document, the site was recommended as an option for allocation in the Housing Site Allocations (HSA) DPD because it was well connected to existing settlement, close to local services and facilities.</p> <p>At preferred options the Parish Council commented that development of the site would extend the village westwards. Concern was also raised over additional traffic movement on to New Road Hill. The Parish Council stated a preference for WOOL006 to be allocated for development.”</p> <p>The application scheme no longer proposes an access onto New Road Hill. Whilst the proposal would “extend the village westwards”, the alternative site was extending the settlement eastwards. There is no distinguishing difference between the principle of such an extension. In any event, the proposal is contained by a mature woodland block which screens and encloses the site from the more open and wider landscape further to the west. In this sense the suggested extension of the village is not out into the wider open countryside but up to a very well established and contained landscape feature. The relationship of the scheme to this landscape feature is also respected.</p> <p>In respect of location (settlement hierarchy, relationship to settlement boundary) the HELAA Assessment notes that the site is adjacent to the settlement of Woolhampton, an identified Service Village that has a more limited range of services and “some limited development potential”. The reference to the settlement having a limited range of services fails to acknowledge the significant, higher order, railway station within Woolhampton. The Assessment records that the site adjoins the settlement boundary on the northern and eastern sides. The A4 Bath Road together with a community facility, car park, allotments and some frontage dwellings lie to the south and south east. The HELAA Assessment confirms that development on the site would not result in harm to the AONB.</p> <p>In respect of highways and access, the Assessment confirms the position in respect of the planning application that there are no objections to the proposed means of access off the Bath Road, no significant impact is expected in respect of local highway capacity, and Highways England has advised that individually, the site would be unlikely to materially impact on the operation of the strategic road network.</p> <p>In respect of flooding, the Assessment confirms that the site lies within flood zone 1 with a low probability of flooding.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>No issues are raised in relation to surface water, ground water flood risk and the Council's drainage officer confirms that the site is suitable for development.</p> <p>The Assessment confirms that the site is not defined as public open space and that there is no requirement for additional public open space provision over and above development plan policy requirements.</p> <p>The Assessment confirms that the site has not been identified as Local Green Space which reinforces the point that the site is not significant in townscape terms.</p> <p>In respect of agricultural land, the site is classified as non-agricultural land. This is hardly surprising given the well contained nature of the site, and its divorced nature from the more open and usable countryside further to the west, all of which point to the site being of limited use other than paddock land on the settlement edge.</p> <p>The Assessment under the heading air quality, pollution and contamination refers to the location of the site adjacent to the A4, with possible Nitrogen Dioxide and Particulate Matter from construction and operational impacts, and possible contamination and high risk of noise and vibration problems to future residents from the A4. It is relevant to note that no such objections were raised in relation to the planning application in respect of these matters. Furthermore, the site allocated and under construction at the eastern end of the village shares a similar frontage relationship onto the Bath Road. These are not therefore considered determinative issues.</p> <p>In respect of potential adverse nature conservation impacts, the Thames Valley Environmental Research Centre highlights the site lying within 500m of priority habitats, ancient woodland, European protected species, priority species, statutory sites, SSSI Impact Risk Zone and local wildlife sites.</p> <p>The Berkshire, Bucks and Oxon wildlife Trust highlight a number of potential impacts to these interests in the absence of any avoidance or mitigation measures. The planning application includes appropriate avoidance and mitigation measures such that the only outstanding nature conservation impacts relate to bats and dormice surveys. The recent surveys submitted to the council as part of the current planning application confirm that these do not present a constraint to the development of the site in the manner proposed. The Council's withdrawal of reason for refusal 3 to an earlier application confirms this too.</p> <p>The 15m buffer zone also confirms appropriate avoidance and mitigation to the nearby ancient woodland.</p> <p>In respect of whether development would be appropriate in the context of existing settlement form, pattern and character of the landscape, a generic passage from the West Berkshire Landscape Character Assessment (2019) is set out in the HELAA. This could apply to any edge of settlement</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>field thereby precluding any form of development at the edge of a sustainable settlement within the identified settlement hierarchy.</p> <p>The site-specific comment does recognise the fact that there is existing residential development to the east and north of the site. It records: “Western boundary of the site nearby open countryside is well screened by mature trees. Further landscape assessment required”. This does not rule out the development having regard to this consideration. “Further landscape assessment required” comes in the form of the application Landscape and Visual Impact Addendum report that accompanies this Statement.</p> <p>The Assessment confirms no harm to or loss of significance to any designated heritage assets. In terms of designated heritage assets, a desk-based archaeological assessment together with some possible fieldwork techniques may be necessary. However, the determination of the earlier application has not identified any such interest. The Planning Statement (paragraph 4.41) also notes that whilst heritage has been identified as a potential matter to be reviewed, this was not identified in the Council’s earlier determination of application 19/01942/OUTMAJ.</p> <p>In terms of minerals and waste, it is noted that the site lies within an existing and proposed mineral safeguarding area. Although the Site Assessment Background Paper refers to a need to consider minerals steralisation issues, as the Planning Statement accompanying the pending application 20/03028/OUTMAJ confirms (paragraph 4.41) states:</p> <p>The site could not reasonably be quarried in a standalone respect due to its limited area and the need to ensure appropriate buffers to the residential properties, oil pipeline and ancient woodland within or adjoining the site. However, should any minerals be observed on site during construction, these can be sent to a local processor rather than sent to landfill [footnote: It is understood that quarries within West Berkshire can accept such limited quantities of minerals for processing]. Again, this could be dealt with by condition. Consequently, mineral extraction is therefore not a constraint for the site.</p> <p>This flexibility should be acknowledged within any policy although as explained above, this is not considered to be a relevant factor for the determination of the earlier application.</p> <p>The suitability conclusions refer to the need for appropriate avoidance and mitigation measures in respect of the ancient woodland, the potential high risk of adverse nature conservation impacts. These have now been addressed as confirmed in the recent ecological survey report and Council’s withdrawal of reason for refusal 3 to the earlier application. The only outstanding matter therefore relates to a further landscape assessment. This as noted is now provided through this application which confirms the acceptable effect of the scheme in landscape character terms. The Assessment confirms that all other sites at the edge of Woolhampton are unsuitable, leaving the application site as the only suitable site at this sustainable Service Village, which the HELAA confirms is suitable</p>	

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>and capable of accommodating additional development. To not support additional meaningful development at Woolhampton, bearing in mind the level of existing transport infrastructure (in particular the railway station), would not be sustainable.</p> <p><b>3 and 4. Availability and Achievability</b> The HELAA confirms that the site is immediately available and achievable with no new issues constraining the development of the site. This representation and the current planning application reaffirm this matter.</p> <p><b>5. Deliverability</b> Within this section of the HELAA the Assessment confirms that the site is available, achievable, potentially developable in part owing to a buffer required joining the ancient woodland on the western site boundary, with suitability unknown due to the outstanding nature conservation surveys and landscape assessment, both of which are now addressed through this application.</p> <p><b>Concluding remarks on 2020 HELAA</b> Overall, the Council’s most recent Assessment highlights the suitability of the site even for a higher level of development than that proposed through the current application scheme. The lower number of dwellings now proposed allows for the appropriate identified mitigation and avoidance measures to be incorporated, in particular in relation to the ancient woodland buffer. The outstanding nature conservation constraints are now resolved through the recent season sensitive bat and dormice surveys, whilst the submitted Landscape and Visual Impact Assessment Addendum to the current application addresses landscape impact. That said, the acknowledgement of the well contained nature of the site confirms the landscape and visual impact is limited. Moreover, the planning officer’s report on the earlier application confirms that “the presence of housing would be conspicuous in public views, albeit localised and filtered (to varying degrees) but would inevitably be an intrinsic change to the character of the area (the site) in this location”. There can be no doubt that with virtually every greenfield site the presence of housing would be conspicuous in public views, but in this case, it is acknowledged that these would be “localised and filtered”. Furthermore, the change from a greenfield site to a housing development, albeit set within a settled and mature landscape, would bring about a change, however, the degree of change in this case is limited, as well as that change being well related to existing built form seen in the same context of the site. This too reduces further the extent of change and impact to a level that is judged by the applicants to be acceptable.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>It is clear that the Council's determination of application 19/01942/OUTMAJ has reviewed the various factors which would need to be addressed to enable residential development of the draft allocation to proceed. Although the HELAA and Site Assessment Background Paper have listed other issues, it is evident that the recent planning application scheme and material submitted with it have addressed these. Council's provisional identification of heritage and minerals as potential factors for development of the site should consequently not be incorporated into the specific expectations of the authority within the policy of the draft Submission Local Plan.</p> <p>The inclusion of our client's land north of the Bath Road in Woolhampton as envisaged by draft Policy RSA20, whilst assisting in the enhancement or maintenance of the vitality of rural communities as required by the NPPF (paragraph 78), will also contribute towards the minimum of 10% of housing allocations to meet the district's overall housing need on a site of less than 1ha, as required by paragraph 68.</p> <p><u>Summary</u></p> <p>These are substantial benefits of the site which have been identified and accepted by officers of the Council through its allocation in policies SP14 and RSA20 of the Emerging Draft Local Plan for the erection of about 20 dwellings.</p> <p>As demonstrated through the submission of applications, including the application currently under consideration ref 20/03028/OUTMAJ, it is under the control of a local housing developer, who is in a position to bring forward the site for approximately 16 no. dwellings, parking, open space and landscaping. The site is therefore deliverable in the immediate five year period and can provide a material number of housing units, including affordable housing, in a location where the short term need is pressing.</p> <p>For the reasons set out above the site's provisional allocation for around 20 dwellings should be retained and confirmed through the Submission Draft Local Plan. The settlement boundary should therefore be revised outlined earlier in this response.</p> <p><b>Conclusion</b></p> <p>Whilst we concur with the Council's inclusion of our client's land north of Bath Road, Woolhampton as an allocation for around 20 dwellings in policies SP14 and RSA20.</p> <p>We welcome the opportunity to open up dialogue with the Council in order to further proposals and the formulation of the detailed policy requirements associated with the allocation of our client's land as currently envisaged in policies SP14 and RSA20.</p>	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA 21 Land east of Salisbury Road, Hungerford**

Number of responses received: 4

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
-		
<b>Statutory consultees</b>		
Thames Water Utilities Ltd (lpr1756)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Outline planning permission (16/03061/OUTMAJ) was granted in November 2017 and Reserved Matter permission (19/01406/RESMAJ) was granted in February 2020.</p> <p>The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>

Respondent (with lpr ref)	Response	Council Response
	Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application	
<b>General consultation bodies</b>		
CPRE Berkshire (lpr1700)	CPRE Berkshire has voiced concerns over the site previously about the large-scale development of 100 houses its impact on the AONB landscape. Exception conditions do not exist for the development in the AONB, which has now started and its distance from the main town is not appropriate for key workers, low income families and those without private transport.	<p>Comments noted. The principle of developing the site was established through the Housing Site Allocations Development Plan Document. Planning permission has already been granted and development is under construction.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Outline planning permission (16/03061/OUTMAJ) was granted in November 2017 and Reserved Matter permission (19/01406/RESMAJ) was granted in February 2020.</p> <p>The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>
Mid and West Berkshire Local Access Forum (lpr1879)	<p>This site is crossed by a public footpath. However, unlike other policies this is not shown on the map. The footpath is adjacent to a hedgerow that continues beyond the site. MWBLAF proposes that this hedgerow is preserved, to retain the character of the footpath.</p> <p>The Forum recommends that the preservation of the hedgerow should be recognised in the policy: The development will be delivered in accordance with the following parameters:</p> <ul style="list-style-type: none"> <li>• The retention of the Public Right of Way <b>and the preservation of the adjacent hedgerow</b> through the site.</li> </ul>	<p>Comments noted. It is understood that the footpath will not be diverted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Outline planning permission (16/03061/OUTMAJ) was granted in November 2017 and Reserved Matter permission (19/01406/RESMAJ) was granted in February 2020.</p>



Respondent (with lpr ref)	Response	Council Response
		The allocation will be removed from the LPR as the site has planning permission and the development is under construction.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr578)	<p>This site is being built out, has full planning consent. However the Applicant is now trying to avoid having any social housing or allotments. This must be resisted at all costs. See comments on SPs 10, 11 &amp; 19 above.</p> <p>No change other than to update the detail on numbers.</p>	<p>Comments are noted. The matters of social housing and allotments are covered by existing policies in the Core Strategy, which the decision maker will need to take into consideration.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017. Outline planning permission (16/03061/OUTMAJ) was granted in November 2017 and Reserved Matter permission (19/01406/RESMAJ) was granted in February 2020.</p> <p>The allocation will be removed from the LPR as the site has planning permission and the development is under construction.</p>
<b>Landowners, site promoters and developers</b>		
-		

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA22 Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)****(Proposed Submission LPR Policy: RSA14 Land adjoining Lynch Lane, Lambourn)**

Number of responses received: 10

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Lambourn NDP Steering Group (lpr1709)	<p>We note the parameters in Policy RSA22 and agree with them. They must be applied.</p> <p>This is a particularly sensitive site, given its proximity to the River Lambourn and the distinctive landscape feature, Lynch Wood.</p> <p>The Landscape Character Appraisal (<i>attached to representation</i>) undertaken to inform the LNDP has identified a Landscape Character Area centred on Lynch Wood, and including this site, to be of major landscape importance within the Parish. It states:</p> <ul style="list-style-type: none"> <li>• The housing allocation for some 60 dwellings (Housing Site Allocations DPD Policy) at Lynch Lane needs to be carefully scaled and designed to complement the village's existing built form and embrace sylvan qualities whilst maintaining strong visual links with the church.</li> <li>• The existing built form includes low density housing often comprising bungalows. Any new development should carefully consider the strong riverine valley features with the hanging woodland that make this location so distinctive.</li> </ul> <p>It further notes: The 2015 Landscape Capacity Study of the land near Lynch Wood concluded that: New development should be severely restricted to conserve character of existing settlements - large-scale developments are not appropriate in this narrow river valley.</p>	<p>Comments noted.</p> <p>The requirements set out in the policy already address these issues.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The number of houses should be no more than 60. The density and height of housing will be of critical importance at this edge of settlement.</p> <p>The River Lambourn, as a protected chalk stream, is of international importance and any development on this site must ensure it is not adversely impacted. Water quality in the river needs to be improved and any run-off from the site, or damage to the river banks and bed, will affect water quality throughout the whole of its course.</p> <p>The LNDP is developing Design Codes which may be relevant to development on this site, but the LPR does state a high standard of housing design is expected.</p> <p>According to Policy SP19 - and given the need for affordable housing <b>in the Parish</b>, especially to support employees in the valuable racehorse training industry - this greenfield site is expected to provide 40% affordable housing.</p> <p>NB: Average figures for rented property in Lambourn are as follows (June 2020):</p> <p><b>Sovereign</b> (social rent): 3 bed: £139 - £146 per week; 2 bed: £127 - £131 per week</p> <p><b>Private rented:</b> 3 bed: £219 per week (£950 per month); 2 bed: £185 per week (£800 per month)</p> <p><b>Affordable rented at 80%:</b> 3 bed: £175 per week; 2 bed £148 per week.</p> <p>Those on single lower quartile incomes (£23,803 pa in Lambourn) are limited to only one form of tenure - social rent. They cannot afford "Affordable" rented accommodation.</p>	
Lambourn Parish Council (lpr1444)	<p>RSA22: (Formerly HSA19) Land adjoining Lynch Lane: 60 dwellings</p> <p>RSA23: (Formerly HSA20) Land at Newbury Road: 5 dwellings</p> <p>This leaves a shortfall of 25 units, 90 being the number of houses WBC judge will be needed. (This number can be updated during the life of the Local Plan). Housing, especially affordable housing, is needed in Lambourn. WBC are aware the emerging Lambourn NDP is not planning to bring forward sites for the allocation of housing. It is anticipated natural development will fill the quota. The emerging LNDP will contain Design Codes to address issues of density and appearance. A NDP, once made is subject to monitoring and review.</p>	<p>Comments noted.</p> <p>Comments in relation to housing numbers and the NDP are dealt with under the Council's response to Policy SP1 and Policy SP12.</p> <p>The Landscape Character Appraisal undertaken for the emerging Lambourn Neighbourhood Development Plan (Lambourn LCA) will usefully inform the required Landscape and Visual Impact Assessment (LVIA)</p>

Respondent (with lpr ref)	Response	Council Response
	<p>RSA22: (Formerly HSA19) Land adjoining Lynch Lane: 60 dwellings. The developers of the site are currently in pre-planning discussions with WBC. They would like to build a larger number of houses on the site than 60. The on-going problems with the incursion of groundwater into the sewers is a constraint on the development.</p> <p>The Landscape Character Appraisal undertaken for the emerging Lambourn Neighbourhood Development Plan (Lambourn LCA) has identified Lynch Wood (LCA5) as a Landscape Character Area which includes this site. In Recommendations to plan, manage and protect distinctiveness of LC5 it states:</p> <p>Lynch Wood should continue to be managed on a sustainable basis, maximising biodiversity and visual appeal.</p> <ul style="list-style-type: none"> <li>• The woodland management needs to plan for the effects of climate change.</li> <li>• Broad leaved species are a key characteristic of the woodland and should continue to prevail.</li> <li>• The housing allocation for some 60 dwellings (Housing Site Allocations DPD Policy) at Lynch Lane needs to be carefully scaled and designed to complement the villages existing built form and embrace sylvan qualities whilst maintaining strong visual links with the church.</li> <li>• The existing built form includes low density housing often comprising bungalows. Any new development should carefully consider the strong riverine valley features with the hanging woodland that make this location so distinctive.</li> <li>• The 2015 Landscape Capacity Study of the land near Lynch Wood concluded that “New development should be severely restricted to conserve character of existing settlements - large-scale developments are not appropriate in this narrow river valley.</li> </ul> <p>The density of development at the edge of the settlement is important, as is sensitivity to the River Lambourn and the SSSI. The River Lambourn is one of only 210 chalk streams in the world. There are already difficulties with water quality, not just with sewage discharge, so care must be taken not to make this worse when</p> <p>Changes:[For RSA22] The policy in the Local Plan Review (RSA22, formerly HSA19) has not changed since the Housing Site Allocations DPD (2006-</p>	

Respondent (with lpr ref)	Response	Council Response
	2026) was adopted in 2017. Many of the concerns about development of the site are addressed in it. We expect those criteria/conditions to be adhered to and would like consideration to be given to the recommendations in the Lambourn LCA.	
Environment Agency (lpr1672)	<p>We welcome the fact that Development will not take place within Flood Zones 2 and 3 including essential infrastructure and water compatible development. This will ensure that flood risk is not increased elsewhere as a result of the proposed development.</p> <p>As the site is adjacent to the River Lambourn SSSI and SAC, which is an internationally important chalk river. It supports valuable habitats and protected species and is sensitive to nutrient loading. We therefore agree with the recommendations, particularly for a wide undeveloped buffer zone, detailed ecological assessments and the requirement for a Habitat Regulations Assessment to accompany any future planning application. The development must also connect to the main sewerage system, to avoid any further sewage discharges from package treatment plants into the Lambourn.</p> <p>We have serious concerns about additional development at this site, due to known issues with sewer network capacity and infiltration. As additional development could exacerbate the problem, a more thorough investigation of the WWTW and the sewer network would be needed. Without this, the development could contribute to, or be adversely affected by, unacceptable levels of water pollution in accordance with Paragraph 170 of the NPPF. Therefore, this allocation would cause the local plan to be found unsound in the future.</p>	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within Lambourn; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works.'</u></p> <p>Also amend the policy as follows – <u>'Development on the site will not adversely affect the adjacent River Lambourn SSSI/SAC and a Habitat Regulations Assessment will be required to accompany any future planning application. The site lies within the hydrological catchment of the River Lambourn SSSI/SAC and the development must demonstrate nutrient neutrality. A Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged;'</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

Respondent (with lpr ref)	Response	Council Response
Historic England (lpr1578)	We support the requirement for proposals to be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted. No changes are required to the policy in light of this representation.
Natural England (lpr1604)	This site is acceptable in terms of the North Wessex Downs AONB due to the scale, design and density work which has been completed. We do however harbour some concerns about the close proximity to the River Lambourn SAC, despite the minimum buffer distances. Great care will have to be taken when considering the required Habitats Regulations Assessment with any future planning application.	Comments noted. Amend the policy as follows – <del>Development on the site will not adversely affect the adjacent River Lambourn SSSI/SAC and a Habitat Regulations Assessment will be required to accompany any future planning application.</del> <u>The site lies within the hydrological catchment of the River Lambourn SSSI/SAC and the development must demonstrate nutrient neutrality. A Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged;</u>
Thames Water (lpr1757)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website. The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential	Comments noted.  A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within Lambourn; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works.'</u>

Respondent (with lpr ref)	Response	Council Response
	wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.	These comments will inform the emerging draft Infrastructure Delivery Plan.
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1880)	<p>MWBLAF welcomes the commitment in this policy to improvements in public rights of way. However, the statement as currently worded is very ambiguous, and needs to be clarified in order that the intended improvements are delivered:</p> <p>(iii) Public Rights of Way and bridleway improvements will include improvement of the pedestrian/bridle link between Lynch Lane and the village centre, and improved connectivity between Lower and Upper Lambourn.</p> <p>A bridleway is normally a class of public right of way. If a permissive bridleway is intended, this should be stated. This no 'pedestrian/bridle link' shown on the West Berkshire online map in the vicinity of Lynch Lane, on either the public rights of way or the local street gazetteer layer.</p> <p>The Forum requests that the improvements to routes for non-motorised users are clarified. It is not clear from the current wording what new or improved routes are proposed, and whether they are intended to become public rights of way. The Forum is therefore unable to proposed specific changes to the wording.</p>	Comments noted.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr979)	The policy is supported.	Support noted
<b>Landowners, site promoters and developers</b>		
Armstrong Rigg Planning on behalf of Manor Oak Homes Ltd (lpr2423)	The Local Plan Review (LPR) intends to review the planning policies of the adopted Local Plan (covering the period up to 2026) and identify the need for future housing, employment land and infrastructure provision in the period up to 2037. The current Regulation 18 consultation seeks comments	<p>Comments noted.</p> <p>These comments relate to the HELAA site LAM7. This site was assessed in the HELAA as not developable within the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>on an early draft of the LPR and follows a call for sites in 2017 and two previous Regulation 18 consultations on the scope and vision of the LPR in early and late 2018 respectively.</p> <p>These representations seek to assess the approach that the LPR should take towards facilitating appropriate and sustainable growth in Lambourn and promotes our client's site at Land at Fairview, Greenways, Lambourn. Our client's site has previously been promoted to the LPR (HELAA Ref. LAM7) for residential development on 2.28ha of land, but our client now wishes to also promote an alternative option for the development of a smaller 1.27ha area comprising just the northern part of LAM7. To ensure that these two site options are considered separately in the HELAA, we are pleased to enclose separate call for sites forms for each.</p> <p>The need to increase the housing requirement across the District and to increase supply in Lambourn to ensure a fair distribution is compounded by the fact that, as demonstrated in these representations, the current allocation for 60 dwellings at Land Adjoining Lynch Lane cannot be considered deliverable. The proposed reallocation of this site by Policy RSA 22 must therefore be removed from the plan in accordance with NPPF paragraph 120 and new deliverable allocations made to ensure housing delivery to meet local needs.</p> <p>Our client's proposals at Land at Fairview, Greenways, Lambourn have been designed to specifically meet the unique housing requirements of Lambourn in providing a high proportion of smaller dwellings and in particular 1 bedroom social rent dwellings suitable for younger staff in the racehorse community. The tailoring of the proposal in this way will provide a significant benefit to the community in meeting local needs. Lambourn's location in the AONB means that its future development is constrained. In this context it is crucial that sites that do come forward maximise the opportunity to deliver the size, type and tenure of housing most needed in the local area. This is our client's firm intention as demonstrated by their current discussions with Racing Welfare as to the possibility of racing related affordable housing forming part of the proposed scheme.</p> <p>The illustrative proposals for our client's site are based on thorough technical assessments of highways, landscape and arboricultural constraints and respond positively to the pre-application advice of officers. Lambourn's</p>	<p>next 15 years. The site was found to be unsuitable because an appropriate access cannot be provided.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>location within the North Wessex Downs AONB constrains the potential development options available to meet the village's significant need and we recognise in this respect that no site is perfect and that choosing the most suitable location for housing is a balance between the various constraints to development and the ability of the site proposed to deliver the size, type and tenure of housing most needed. In this context, we consider our client's proposals to represent the most sustainable solution to helping meet Lambourn's housing needs. It is our understanding that the emerging Lambourn Neighbourhood Plan will not allocate sites and as such we consider our client's land should be allocated in the emerging LPR.</p> <p>Our client firmly objects to the reallocation of this site in the emerging LPR. The site has been allocated since 2017 and was an emerging allocation before this meaning that the developer has had in excess of 5 years to bring forwards proposals on the site. Despite this, no planning application has been submitted and it is not yet included in the Council's housing trajectory for the current five year period, indicating concerns regarding its delivery. The Council's Five Year Housing Land Supply at December 2019 report states that the site is owned by Hygrove Homes Ltd (a small housebuilder currently building out two small sites in South West Wales) who did not respond to the Council's consultation to confirm the deliverability of the site. This combined with the small size of the company and lack of local experience would appear to confirm that the Council are right to be concerned about its deliverability. Further, we are aware from discussions with Lambourn Parish Council that the developer has previously stated that the site is not able to viably deliver the most pressing affordable housing needs of the village (i.e. 1 bedroom social rent dwellings for racing staff). This is further indication that the allocation is not viable or deliverable. Further, part of the allocation is in Flood Zone 3 and near to River Lambourn SAC / SSSI, such that we consider a review of its suitability is required. NPPF paragraph 120 advises Local Planning Authorities that planning policies and decisions need to reflect changes in the demand for land and should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan they should, if appropriate,</p>	

Respondent (with lpr ref)	Response	Council Response
	deallocate sites which are undeveloped. We do not consider Land Adjoining Lynch Lane to be deliverable and therefore recommend that the Council should consider other more appropriate sites to meet the village's housing needs.	
Carter Planning Ltd on behalf of Mr R.L.A. Jones (lpr1904)	<p>The policy is not supported. Our Clients have made representations elsewhere that the housing provision in the Plan is inadequate and extra sites should be included, in particular our Client's Site formerly known as "Land between Folly Road, Rockfel Road and Stork House Drive (SHLAA site reference LAM007)".</p> <p>However if the Council considers that extra sites are not required then LAM007 should be included instead of sites RSA22 or more particularly RSA23 in the Draft Plan document.</p> <p>RSA 22 has the disadvantage of being a very large site for the village to accommodate. The capacity of the site has risen arbitrarily since the 2014 Preferred Options document and yet the constraints have increased. It lies alongside an SSI/SAC and part of the site is liable to flooding from the River Lambourn which flows along the northern boundary. No work was carried out on a number of aspects including archaeology before its previous allocation. It appears that the site capacity has arbitrarily increased by 4 units from 56 in the 2014 document to 60 in the adopted document merely so that, together with site RSA23, it tried to compensate for the unjustified omission in this version of the Plan of site LAM007 which was previously included.</p> <p>The Summary of Lambourn Sites previously noted the negative points in relation to environmental sustainability and flooding. The need for a buffer zone and the inability to develop within the flood zone appear to reduce the size and capacity of the site and not to increase it as was previously suggested (from 56 to 60) in the adopted DPD.</p> <p>When the site was proposed in the adopted Plan the Parish Council within their response included the following key points:-</p> <ul style="list-style-type: none"> <li>• "Environment -the site is within the AONB. The site is immediately adjacent to the River Lambourn, the corridor of which is a Site of Special Scientific Interest.</li> </ul>	<p>Comments noted.</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p> <p>The site LAM1 was promoted as part of the HELAA which concluded the site was 'potentially developable in part'. Development of the lower eastern sections of the site would not harm the natural beauty of the AONB and would relate to the existing settlement pattern.</p> <p>Following the publication of the HELAA in February 2019 and the update in December 2020, further evidence for the LPR has been produced. The Level 2 Strategic Flood Risk Assessment (SFRA) published in December 2021 indicates that part of the site is at risk from groundwater emergence during a 1 in 100 year flood event.</p> <p>The Level 2 SFRA mentions that whilst there weren't any reported incidences of groundwater flooding on the site during the 2013/14 flood event, this might have been because the site is grassland rather than a habited property so wasn't reported. Groundwater emergence modelling indicates that part of the site was affected. The revised NPPF published in July 2021 now places emphases on considering "...flood risk from all sources and the current and future impacts of climate change..." (para 160). The NPPF is clear at para 159 that "...inappropriate development in areas at risk of flooding</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Housing and the Community – Lambourn needs a period of consolidation to adjust to the social impact resulting from recent rapid growth.</li> <li>• Industry – impact on the racehorse industry– safety of horses and riders will be affected by increased traffic generation.</li> <li>• Archaeology – Lambourn formed part of the parkland of Lambourn Place, and the site is believed to be a site of a Saxon palace. Any development would destroy this.</li> <li>• Roads – roads are narrow, with blind bends and dangerous junctions. Inadequate footpaths and the roads are busy. Any increase in traffic will be detrimental to the safety of the road users".</li> </ul> <p>These matters not satisfactorily addressed.  The Lambourn Site Assessments document, in its summary notes that "the Parish Council had various concerns about this site, as does the local community". Indeed this was the least favoured site for development by the residents responding to the survey.  Since being selected for the last Local Plan and accepted by the Inspector in April 2017 the site has not come forward.  No applications have been made for its development.  It does not appear to be genuinely available and should now be omitted from the emerging Draft Plan.  The Plan's approach to the selection of sites is not justified.  The Draft Plan's approach to the selection of sites is not justified. Land adj. Lynch Lane has not come forward for development since its inclusion in the former Plan in April 2017. Further the detailed examination of Policy RSA22 means that it may not be delivered in future either or may only delivered with reduced capacity. Our Clients would prefer that Site RSA22 is now omitted. However if there is a need for additional housing then our Client's site formerly LAM007 Land off Rockfell/Folly Road should be included as a site to ensure that the Local Plan Review is both sound and effective.</p>	<p><i>should be avoided by directing development away from areas at highest risk (whether existing or future)."</i></p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR Policy: RSA23 Land at Newbury Road, Lambourn (Site Ref: HSA 20)**

**(Proposed Submission LPR Policy: RSA15 Land at Newbury Road, Lambourn)**

Number of responses received: 7

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Lambourn NDP Steering Group (lpr1710)	<p>We note the parameters in Policy RSA23 and agree with them. They must be applied.</p> <p>In looking at the edge of settlement in Lambourn, the Landscape Character Appraisal (<i>attached to the representation</i>) undertaken for the Lambourn NDP commented on this site:</p> <p>Development at land allocation HSA20 on Newbury Road should be designed to consider this viewpoint (from the north west) and the existing western boundary of the village. Landscaping proposals for the site should ensure native broadleaved trees form the upper part of the allocation as per planning policy HSA20 of the local plan.</p> <p>Upper valley sides are important to the setting of Lambourn in context of the AONB.</p> <p>Development above the natural topographic enclosure of the village would be detrimental to the overall setting and views at this location. Development at land allocation HSA20 on Newbury Road should be designed to consider this viewpoint (<i>from the southwest</i>) and the existing western boundary of the village. Landscaping proposals for the site should ensure native broadleaved trees form the upper part of the allocation as per planning policy HSA20 of the local plan.</p> <p>These comments largely align with the parameters in Policy RSA23.</p>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>We note the planning application 20/00972/FULMAJ for this site is for 8, not 5 dwellings.</p> <p>Our Emerging Settlement Character Appraisal has identified that Woodbury and indeed the other dwellings on the north side of Newbury Road are set well back from the road creating good transition from the countryside into the village.</p>	
Lambourn Parish Council (lpr2471)	<p>RSA22: (Formerly HSA19) Land adjoining Lynch Lane: 60 dwellings            RSA23: (Formerly HSA20) Land at Newbury Road: 5 dwellings            This leaves a shortfall of 25 units, 90 being the number of houses WBC judge will be needed. (This number can be updated during the life of the Local Plan). Housing, especially affordable housing, is needed in Lambourn.</p> <p>WBC are aware the emerging Lambourn NDP is not planning to bring forward sites for the allocation of housing. It is anticipated natural development will fill the quota. The emerging LNDP will contain Design Codes to address issues of density and appearance. A NDP, once made is subject to monitoring and review.</p> <p>RSA23: (Formerly HSA20) Land at Newbury Road: 5 dwellings            An amended Planning Application for 8 dwellings on this site is currently with WBC, to which Lambourn Parish Council has commented:            20/00972/FULMAJ - Land North of Newbury Road, Lambourn – Erection of eight semi-detached 'build to rent affordable eco-dwellings, parking, landscaping and associated works. Amended plans received. LPC objected to the original plan in June, on the grounds that: 1. Twice as many houses as allocated for site, which increases traffic and demands on parking spaces 2. Detrimental impact on AONB – unimaginative and inappropriate design, poorly screened 3. Level of affordable housing rent was unrealistic 4. Access unsuitable for elderly residents (Both 3 and 4 miss identified housing shortage groups) 5. Concerns re: drainage and sewers            Delighted to see amended plan both reduces the number of houses (from 10 to 8) and substantially alters the design of the houses. There are now 4 different versions of the plans, so each pair of houses is different, and screening and parking has been improved. The applicants are to be commended for all of this. Regarding the house plans, we suggest they do</p>	<p>Comments noted</p> <p>Comments in relation to housing numbers and the NDP are dealt with under the Council's response to Policy SP1 and Policy SP12.</p> <p>Planning permission for development on the site was granted in September 2021. Because development has not yet been built out, the allocation is being retained.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>not use type 2, because the flat roof does look very different to the others, which all have gables in some form or another. Repeating the design of type 1, 3 or 4 would be a good fit. LPC is still concerned about the level of affordable housing rent. We note the Housing Development Officer has reservations about the lack of detail concerning affordable housing. LPC's concerns about the drainage and sewers remain.</p> <p>The Lambourn LCA also comments: Development at land allocation HSA20 on Newbury Road should be designed to consider this viewpoint (from the South West of Lambourn) and the existing western boundary of the village. Landscaping proposals for the site should ensure mature broadleaved trees form the upper part of the allocation as per planning policy HSA20 of the local plan.</p> <p>Changes: [For RSA23] We expect the criteria/conditions in the policy to be adhered to and would like consideration to be given to the recommendations in the Lambourn LCA.</p>	
Environment Agency (lpr1673)	<p>Due to the proximity of the River Lambourn SSSI and SAC, any development must be shown to have no adverse impacts on the river and its corridor, for instance from surface water run-off. As with RSA 22, the development must connect to the main sewerage system.</p>	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -</p> <p><u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Development on the site will connect to the mains sewerage system. Infiltration from groundwater into the</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p>network has been identified as a strategic issue within Lambourn; therefore development on the site will connect to the mains sewerage system.' <del>an integrated Water Supply and Drainage Strategy will be required for this site</del></p> <p>Also amend the policy as follows –  '<u>The site lies within the hydrological catchment of the River Lambourn SSSI/SAC and the development must demonstrate nutrient neutrality. A Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged;</u>'</p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
Historic England (lpr1579)	We support the requirement for development to be informed by an archaeological assessment in the form of a geophysical survey followed by trial trenching if necessary, in accordance with NPPF paragraph 189.	Comments noted.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr980)	The policy is supported.	Support noted.
<b>Landowners, site promoters and developers</b>		
Armstrong Rigg Planning on behalf of Manor Oak Homes Ltd (lpr2422)	The Local Plan Review (LPR) intends to review the planning policies of the adopted Local Plan (covering the period up to 2026) and identify the need for future housing, employment land and infrastructure provision in the period up to 2037. The current Regulation 18 consultation seeks comments on an early draft of the LPR and follows a call for sites in 2017 and two previous Regulation 18 consultations on the scope and vision of the LPR in early and late 2018 respectively.	<p>Comments noted.</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>These representations seek to assess the approach that the LPR should take towards facilitating appropriate and sustainable growth in Lambourn and promotes our client's site at Land at Fairview, Greenways, Lambourn. Our client's site has previously been promoted to the LPR (HELAA Ref. LAM7) for residential development on 2.28ha of land, but our client now wishes to also promote an alternative option for the development of a smaller 1.27ha area comprising just the northern part of LAM7. To ensure that these two site options are considered separately in the HELAA, we are pleased to enclose separate call for sites forms for each.</p> <p>Our client's proposals at Land at Fairview, Greenways, Lambourn have been designed to specifically meet the unique housing requirements of Lambourn in providing a high proportion of smaller dwellings and in particular 1 bedroom social rent dwellings suitable for younger staff in the racehorse community. The tailoring of the proposal in this way will provide a significant benefit to the community in meeting local needs. Lambourn's location in the AONB means that its future development is constrained. In this context it is crucial that sites that do come forward maximise the opportunity to deliver the size, type and tenure of housing most needed in the local area. This is our client's firm intention as demonstrated by their current discussions with Racing Welfare as to the possibility of racing related affordable housing forming part of the proposed scheme.</p> <p>The illustrative proposals for our client's site are based on thorough technical assessments of highways, landscape and arboricultural constraints and respond positively to the pre-application advice of officers. Lambourn's location within the North Wessex Down's AONB constrains the potential development options available to meet the village's significant need and we recognise in this respect that no site is perfect and that choosing the most suitable location for housing is a balance between the various constraints to development and the ability of the site proposed to deliver the size, type and tenure of housing most needed. In this context, we consider our client's proposals to represent the most sustainable solution to helping meet Lambourn's housing needs. It is our understanding that the emerging Lambourn Neighbourhood Plan will not allocate sites and as such we consider our client's land should be allocated in the emerging LPR.</p>	<p>existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Our client does not object to the reallocation of this site, as despite some clear difficulties with bringing the site forward (one application refused – Ref: 17/00825/FULD – due to a failure to agree an off-site affordable contribution and a second application with outstanding landscape and housing objections - 20/00972/FULMAJ), there is clear intent on behalf of the landowner to bring the site forward.</p>	
<p>Carter Planning Ltd on behalf of Mr R.L.A. Jones (lpr1905)</p>	<p>The policy is not supported. RSA 23 should be deleted and replaced by our Clients previously preferred Option Site “Land between Folly Road, Rockfel Road and Stork House Drive” (SHLAA site reference LAM007). Site RSA 23 has not commenced development since being allocated in April 2017.</p> <p>Indeed planning permission was refused that year because:- “1. Notwithstanding the fact that the application forms part of the HSADPD 2017 as adopted, the applicant has failed to enter into a s106 planning obligation to achieve an appropriate contribution, for affordable housing of £400,000, in accord with policy CS6 in the West Berkshire Core Strategy 2006 to 2026. It is thus contrary to policies GS1 and HSA20 in the HSADPD of 2017 and policy CS6 as identified and the advice in the NPPF”. Please see application 17/00825/FULD and the refusal notice dated 19th October 2017.</p> <p>Further application has been made to develop the site which remains undetermined.</p> <p>In the 2017 application the Parish Council and Natural England objected because of the visual impact on the landscape. There was no information on flooding and archaeology and there were highways problems with bin storage, the need to move a bus stop and the lack of a foot path across the entire site frontage. No affordable housing was provided.</p> <p>This rather suggests that the site is not practical or economic to develop. Application ref. 20/00972/FULMAJ has been amended from 10 to 8 dwellings which exceeds the Local Plan density. Despite being submitted on 21 April 2020 it remains undetermined.</p> <p>The principal problem with the development is stated to be the effect on the wider landscape character of the area, in particular against the underlying objective to conserve and enhance the landscape character of the AONB. The proposed development due to its high density of dwellings is thought to</p>	<p>Comments noted.</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. Because development has not yet been built out, the allocation is being retained.</p> <p>The site LAM1 was promoted as part of the HELAA which concluded the site was ‘potentially developable in part’. Development of the lower eastern sections of the site would not harm the natural beauty of the AONB and would relate to the existing settlement pattern.</p> <p>Following the publication of the HELAA in February 2019 and the update in December 2020, further evidence for the LPR has been produced. The Level 2 Strategic Flood Risk Assessment (SFRA) published in December 2021 indicates that part of the site is at risk from groundwater emergence during a 1 in 100 year flood event.</p> <p>The Level 2 SFRA mentions that whilst there weren’t any reported incidences of groundwater flooding on the site during the 2013/14 flood event, this might have been because the site is grassland rather than a habited property so wasn’t reported. Groundwater emergence modelling indicates that part of the site was affected. The revised NPPF published in July 2021 now places emphases on considering “...flood risk from all sources and the current and future impacts of climate change...”</p>

Respondent (with lpr ref)	Response	Council Response
	<p>form a hard settlement edge, which will be out of character with the adjacent settlement edge characterised by a low density of development in mature gardens. The proposals are currently considered to result in an adverse effect on the wider landscape character of the AONB.</p> <p>Policy RSA 23 is a very small, inflexible site and makes little contribution to housing supply (five dwellings). It appears to have been included (and the notional capacity of RSA 22 increased) merely so that our Clients site LAM007, previously included as being acceptable, could be excluded.</p> <p>Policy RSA (or HSA21 or LAM015) was not examined in the West Berks Landscape Sensitivity Assessment by Kirkham Landscape Planning.</p> <p>The reference to the site in The Lambourn Site Assessment was both cursory and inadequate.</p> <p>The Parish Council were not consulted (apparently it appears neither were statutory consultees).</p> <p>RSA 23 scored poorly when compared against the criteria in the settlement boundary review. It was accepted that it forms an extension of the existing settlement boundary.</p> <p>RSA23 was selected at a late stage and has no identifiable feature to create its northern boundary. There is no landscaped boundary. It is on a ridge and can be described as an open area on the edge of the settlement seen at the entrance to the village. It also lies close to the Medieval Village of Bockhampton.</p> <p>Policy RSA 23 should be deleted and our Client's site formerly LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive" (SHLAA site reference LAM007) should replace it.</p> <p>Site RSA23 should be omitted. It did not go through the rigorous consultation process or selection procedure applied to other sites such as our Client's LAM007. Its impact on the landscape was never adequately assessed. It is further from services than LAM007 and has a number of other disadvantages. It is not practical or available for development currently.</p> <p>The inclusion of RSA23 would undermine the Plan and would mean that it is both unsound and ineffective.</p>	<p>(para 160). The NPPF is clear at para 159 that <i>"...inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future)."</i></p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA24 Land off Stretton Close, Bradfield Southend (Site Ref: HSA 22)**

Number of responses received: 2

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Thames Water (lpr1765)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Groundwater: The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water</p>	<p>Comments noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (17/03411/OUTMAJ) was granted in February 2019 and Reserved Matters permission (20/02410/RESMAJ) in January 2021.</p> <p>The allocation will now be removed from the LPR as the site has planning permission and development is under construction.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>(or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <p>There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.</p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p>	
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr981)	<p>The policy is supported.</p> <p>We believe that other HELAA sites adjacent (Brad2/3/5) could increase the allocation here by about 45. Add in HELAA sites Brad2/3/5 at the numbers promoted.</p>	<p>Support noted.</p> <p>The site was allocated within the Housing Site Allocations Development Plan Document (HSA DPD) which was adopted in May 2017.</p> <p>Outline planning permission (17/03411/OUTMAJ) was granted in February 2019 and Reserved Matters permission (20/02410/RESMAJ) in January 2021.</p> <p>The allocation will now be removed from the LPR as the site has planning permission and development is under construction.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA25 Land North of Southend Road, Bradfield Southend****(Proposed Submission LPR Policy: RSA16 Land North of Southend Road, Bradfield Southend)**

Number of responses received: 11

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Bradfield Parish Council (lpr1856)	<p>The proposed access to the site “Access from South End Road, via the small industrial estate...” is impractical. The options for access to the site which, we understand have been considered are:</p> <ul style="list-style-type: none"> <li>• Access from South End Road: The road/track is not wide enough to support access to the proposed development site. Use of the track would mix industrial/commercial traffic with residential traffic. There is not enough width for a footway or utilities strip.</li> <li>• Access via Stretton Close: This is unlikely to be possible. The development of Land off Stretton Close (see RSA 24) has been granted planning permission (see 17/03411/OUTMAJ and 20/02410/RESMAJ) which does not include a sacrifice strip to enable access to the site. The approved highway is a ‘shared surface’. The housing density approved, precludes this access.</li> <li>• Access from Cock Lane via Crack Willow would require highway construction across both BRAD2 and BRAD3. Both these sites were discounted for development following the HELAA submission.</li> </ul>	<p>Comments noted.</p> <p>The Highways Authority comment that adoptable access is achievable immediately on to Southend Road. The scheme is relatively small scale, and thus the access is appropriate for a development of this size.</p> <p>Bradfield Southend is a Service Village, where there is potential for some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs. Bradfield Southend benefits from some key facilities, including a shop and primary school. 20 dwellings is considered appropriate as a small scale development in this location.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The plot of land is essentially landlocked. The earlier assessments of the sites in Bradfield were based upon there being a regular two hourly bus service; this has since been reduced to a bus service on Monday and Wednesday only.</p>	
Thames Water Utilities (lpr1766)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Groundwater: The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at</p>	<p>Comments noted. The developer will be aware of their responsibilities through the planning process, and in consideration of Policy DM7.</p> <p>A criterion will be added to the policy: '<u>An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy</u>'.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><a href="https://www.gov.uk/government/publications/groundwater-protection-position-statements">https://www.gov.uk/government/publications/groundwater-protection-position-statements</a>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network. If possible foul water discharge should be split between sewers to the north and south to reduce the impact on the existing infrastructure.</p>	
<b>General consultation bodies</b>		
North Wessex Downs AONB (lpr1618)	<p>Supports the allocation. The site is the logical choice and would tie in with the existing allocation, landscape buffer would reduce the developable area to one that is more appropriate for the settlement. Development along the south western edge in line with the current allocation would be acceptable without detriment to the north western boundary of Bradfield Southend. This part of the site is well contained by existing landforms, vegetation and the existing built environment.</p>	<p>Comments noted. The site specific policy will detail the landscape buffer.</p>
<b>Other stakeholders</b>		
Jonathan Alderman (lpr547)	<p>The site is land locked because the access proposed is non-viable. A report, produced in 2014 by Michael Wheat, assessed 3 options to access the land behind Stretton Close, including the access proposed for this site. It was concluded that the proposed access was non-viable and unacceptable due to the inability to upgrade it to an appropriate adoptable standard in terms of layout and visibility without acquiring third party land. The access also passes through a small industrial estate and it was considered inappropriate to mix commercial and residential traffic. The access via Stretton Close is also non-viable as the site (RSA24) has now been granted outline planning permission.</p> <p>Re RSA25 there are no changes I am seeking as it is a non-starter. The decisions on site allocation in Bradfield Southend all carry ramifications linked to infrastructure provision and transport for the village. These are all</p>	<p>The Highways Authority comment that adoptable access is achievable immediately on to South End Road.</p> <p>Bradfield Southend is a Service Village, where there is potential for some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs. Bradfield Southend benefits from some key facilities, including a shop and primary school. 20 dwellings is considered appropriate as a small scale development, and residents will be able to support these services.</p> <p>The formal consultations held for the Local Plan Review are one method of engaging with Parish Councils, and the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>very poor currently and will not sustain any significant development proposals.</p> <p>The LDP review of Bradfield Southend should involve the local Parish Council and other community stakeholders to determine the best way to proceed. Perhaps a Neighbour Plan is one option.</p>	<p>Parish Council has engaged with the process. The Parish Council is able to prepare a Neighbourhood Development Plan.</p>
Michelle Belcher (lpr2276)	<p>Does not agree with the proposed site allocation.</p>	<p>Comments noted.</p>
Fiona McPherson Crowther (lpr2143)	<p>I am writing to register my objection to the emerging draft of the Local Plan, with particular reference to the proposed RSA25 site ref BRAD5 Bradfield Southend. This site sits in an ANOB, thus would have a detrimental and significantly adverse impact on local wildlife. The site sits next to a recently approved development, meaning the village is likely to become overdeveloped. The village does not have sufficient infrastructure or services to sustain more housing, with no reliable and regular public transport. The proposed site access is unsuitable, with existing covenants and Stretton Close is also unsuitable given the recent approval of a development. In addition the field floods, causing surface water to collect in the track and gardens. The increased traffic will bring further pollution to an AONB. The long term impact of moving settlement boundaries has not been thoroughly considered, as it will lead to a significant loss of established, rich wildlife habitat and allow for potential extensive future infill of the village.</p>	<p>Comments noted.</p> <p>Based on the site area there is potential for some 33 dwellings. However, it was considered that due to the AONB location and impact on the landscape, the size of Bradfield Southend with services contained within, and following on from a landscape assessment, that part of the site is appropriate for development. On this basis 20 dwellings is considered appropriate.</p> <p>The site is within Flood Zone 1, and therefore has the lowest probability of flooding. There is an existing watercourse in the northern part of the site. Development would not be located in this area. SuDS would be required, as required by Policy SP6 of the Local Plan Review.</p>
Diane Turner (lpr2133)	<p>I am writing to you today regarding the proposed RSA25 site ref BRAD5 Bradfield Southend. This consists of a proposal of up to 13 new dwellings with access from South End Road. The site marked out on the map includes access from the main road down a track to the proposed field. This is a privately owned.</p> <p><b>Policy RSA 25 Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)</b></p> <p>The site, as identified on the indicative map, is proposed to be allocated for residential development.</p> <p>The site has a developable area of approximately 0.8ha, taking into account the outcomes of the Landscape Capacity Assessment (2014).</p>	<p>Comments noted.</p> <p>The Highways Authority comment that adoptable access is achievable immediately on to South End Road.</p> <p>The site promoters consider that they are able to use the access road to Southend Road. It is not envisaged in this policy that access, through the Stretton Close development, would be a reserve option. This is particularly important given the presence of trees protected under Tree Protection Orders on the eastern boundary of the site.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>The developable area of the site could accommodate up to 13 dwellings. Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements that will include amongst others: The provision of a substantial tree belt along the northern boundary, linking to the existing tree belt on the eastern boundary and with new tree planting in site RSA24.</p> <p>Access from South End Road, via the small industrial estate, subject to an assessment of the impact on existing trees.</p> <p>A full detailed landscape and visual impact assessment that will inform the final capacity of the site.</p> <p>However, if the plans are approved in the future for RSA25 but access cannot be gained from South End Road this could impact us in Stretton Close as a proposed site has been applied for and now approved with up to 10 dwellings RSA24 site ref: HSA22.</p> <p>I would like it noted that I <b>object</b> to the proposed site RSA25 <b>or access</b> through Stretton Close. The impact of further traffic through a small village and through a small entrance in Stretton Close will have a significant impact on current households. The facilities within the village are already stretched and with the possibility of further housing on the horizon is worrying and stressful.</p>	<p>Bradfield Southend is a Service Village, where there is potential for some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs. Bradfield Southend benefits from some key facilities, including a shop and primary school. 20 dwellings is considered appropriate as a small scale development, and residents will be able to support these services.</p>
Councillor Tony Vickers (lpr982)	Supports the allocation. Notes it was promoted for 33 dwellings. Suggest an increase to 30.	Comments noted. It is considered that approximately 20 dwellings would be appropriate for this location, and alongside the adjacent site on land at Stretton Close. This is in regard to the AONB location and landscape evidence, and in consideration of the size of Bradfield Southend with services contained within.
<b>Landowners, site promoters and developers</b>		
Pro Vision for Rivar Ltd (lpr1515)	<p>Supports the allocation.</p> <p>Policy SP 15 of the Consultation Document identifies part of the 'Land north of Southend Road, Bradfield Southend' as a preferred site allocation for approximately 13 dwellings.</p> <p>A site-specific Policy is included at Policy RSA 25 of the Consultation Document and confirms that part of the site has been allocated due to the</p>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>outcomes in the Council's Landscape Capacity Assessment (2014) and located in the North Wessex Area of Outstanding Natural beauty (AONB). However, it is acknowledged that there is a need for a detailed landscape and visual impact assessment (LVIA) to inform the final capacity of the site. We agree with the Council's conclusions in the HELAA and the Site Selection Background Paper (December 2020) that the site is suitable for allocation for residential development.</p> <p>It is considered that the subject site is a developable option for the following reasons:</p> <ul style="list-style-type: none"> <li>a) There is a need to identify small/medium scale sites for housing in West Berkshire to meet the indicative housing requirements during the plan period.</li> <li>b) Bradfield Southend is identified as a 'service village' in the settlement hierarchy and, therefore, a suitable location for reasonable additional growth.</li> <li>c) The site would adjoin the existing built-up area and is considered an appropriate extension to Bradfield Southend.</li> <li>d) Residential development in this location would be in keeping with the surrounding area and will seek to conserve and enhance the AONB.</li> <li>e) The provision of additional tree planting provides an opportunity to provide a robust boundary to the settlement and provide landscape and ecological enhancements.</li> <li>f) Further opportunity to deliver new areas of green infrastructure and the creation of areas of green amenity/open space, including biodiversity benefits.</li> <li>g) The site is located in Flood Zone 1 (i.e. low probability of flooding) and a sustainable drainage system would be provided.</li> <li>h) The development of the site will assist in supporting local facilities and other business services in the village through an uplift in population and their associated increase in local expenditure.</li> <li>i) The site is in close proximity to key local facilities and services available. Future residents would therefore benefit from these existing services.</li> <li>j) A vehicular access can be delivered along the existing commercial roadway via Southend Road.</li> <li>k) The scale of dwellings proposed is capable of delivering housing in line with local objectives, such as need for affordable housing.</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<p>l) The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.</p> <p>m) The site is available for a residential development immediately. The development land is within single ownership and Rivar has an agreement to purchase this land.</p> <p>n) Furthermore, as far as we are aware, there are no factors which would prevent this site coming forward for residential development.</p> <p>Accordingly, there are no identifiable constraints that would prevent the delivery of the site for residential development. The site is therefore suitable, available, and achievable for a small/medium scale development of new homes, in a timely and sustainable manner.</p> <p>We trust the above comments clearly set out Rivar's position at this stage. We look forward to engaging with the Council through the continued preparation of the Plan and to provide further information to support the proposed allocation of the site. We would be very happy to arrange a meeting to enable further discussions.</p>	
West Build Homes (lpr2141)	<p>Westbuild contends that RSA25 (land north of Southend Road, Bradfield) cannot be delivered with the vehicular access as shown, due to adverse impact on protected trees, and insufficient geometry/ width for an adopted road between the existing buildings, root protection zones and boundaries. Site RSA25 should be removed from SP15.</p>	<p>Comments noted.</p> <p>The Highways Authority do not report concerns and comment that an adoptable access is achievable immediately on to Southend Road. The policy would ensure that the access would need to take into account the TPOs on the eastern boundary.</p>
Bell Cornwell for Friday Street Developments (lpr2362)	<p><i>Representation promoting the allocation of land at Ash Grove, Bradfield Southend.</i></p> <p>We object to the allocation RSA 25 land north of Southend Road, which we have assessed is not justified in terms of the evidence. We consider that the Council has been inconsistent in their assessment of that site, particularly in regard to the selection of a partial area of the site for allocation – and their previous assessment of the site.</p>	<p>Comments noted.</p> <p>The site was previously ruled out based on landscape advice. If Stretton Close was to remain undeveloped the site would be poorly connected to the rest of the settlement. Now that the site at Stretton Close has outline and reserved matters permission granted with development underway, the proposed allocated site would be read alongside this site. As outlined in the AONB Board's comments the site would be a logical extension. Appropriate landscaping would be required in the site specific criteria.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR Policy: RSA26 Land at Chieveley Glebe, Chieveley**

**(Proposed Submission LPR Policy: RSA17 Land at Chieveley Glebe, Chieveley)**

Number of responses received: 20

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Chieveley Parish Council (lpr1723)	<p>Disagree with the proposed allocation.</p> <ol style="list-style-type: none"> <li>1. There is insufficient information on this proposed allocation and how the form of development proposed. This is evident when compared to other allocation proposals set out in the Plan. The issues mentioned below are of particular concern.</li> <li>2. Following the Parish Plan consultation there is a need in the Chieveley to provide a new burial ground. Site RSA 26 is also the site of the most likely location for a new burial ground. There is no mention as to how this will be achieved if RSA 26 goes ahead and as currently proposed the allocation would prevent the future development of a burial ground in this location.</li> <li>3. It is not clear how the site and/or individual dwellings would be accessed from East Lane, including whether there would be individual accesses to East Lane from the 15 dwellings.</li> </ol>	<p>Comments noted.</p> <p><u>Information on the proposed allocation:</u></p> <p>Within the Regulation 18 draft emerging Local Plan Review (LPR) it was made clear that the detailed policy criteria for the new allocations was still to be developed.</p> <p>In the time available to prepare the draft emerging LPR for a Regulation 18 consultation in December 2020, it was unfortunately not possible to prepare detailed policies for the new residential allocations.</p> <p>A number of residential allocations within the draft emerging LPR have been retained from the Housing Site Allocations Development Plan Document (HSA DPD), which forms part of the current Local Plan. It is for this</p>

Respondent (with lpr ref)	Response	Council Response
	<p>4. Traffic is already an issue in Chieveley, notably at the East Lane/High Street junction and around the Doctor's surgery. More development and accesses in this location would need full assessment.</p> <p>5. Impact on the environment including the landscape impact of the loss of hedgerows and trees and their protection.</p> <p>That said, Chieveley Parish Council agrees with the Council and its landscape assessment that the larger area of land at RSA 26 which is shown edged blue on the inset plan for this site should not be developed.</p> <p><b><i>What changes are you seeking / what would be your preferred approach?</i></b></p> <p>Removal of site RSA 26 from the Local Plan.</p>	<p>reason that some allocation policies were more detailed than others.</p> <p><u>Burial ground:</u></p> <p>At the time of the Regulation 18 consultation on the draft emerging LPR, West Berkshire Council (WBC) were unaware that the burial space available at St. Mary's Church was running out.</p> <p>As part of their Regulation 18 representations, the landowner of proposed allocation 'Land at Chieveley Glebe' suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p> <p><u>Access and traffic:</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Environmental impact:</u></p> <p>The site was promoted through the ‘call for sites’ for the Council’s Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent</p>

Respondent (with lpr ref)	Response	Council Response
		<p>upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></i></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Landscape assessment:</u></p> <p>Support for the LSA noted.</p>
Historic England (lpr1580)	<p><i>See attachments on Objective for full response to the Local Plan Review consultation.</i></p> <p>This site is adjacent to a conservation area that lacks a conservation area appraisal. A conservation area appraisal should be carried out as part of the plan-making process (i.e. prior to allocation), in to inform development on this site. As a minimum, a heritage impact assessment should be carried out prior to allocation, in order to ensure that the principle of development on this site is acceptable, in terms of impact on the setting of the conservation area and that an appropriate level of development is allocated in the plan. Without such evidence to inform the plan-making stage, there is a risk that the plan could allocate too much or too little development on the site.</p>	<p>Comments noted.</p> <p>The Council is in the process of preparing Conservation Area Appraisals.</p> <p>The site allocation policy will include a requirement for a Heritage Impact Assessment:</p> <p><i><u>g. The development design and layout will be further informed by a Heritage Impact Assessment.</u></i></p>
Savills (UK) Ltd for Thames Water (lpr1758)	<b>Water response:</b>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b></p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p> <p><b>Additional Comments:</b></p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p>	<p>Whilst no impact upon the water supply and waste water network is envisaged, the policy will nonetheless include a requirement for an integrated water supply and drainage strategy particularly in light of the upgrades required to the Chieveley Sewage Treatment Works in light of March 2022 designation of the River Lambourn Nutrient Neutrality Zone:</p> <p><i><u>i. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the Chieveley Sewage Treatment Works.</u></i></p>
<b>General consultation bodies</b>		
North Wessex Downs AONB (lpr1619)	Agree with the proposed allocation.	Support for allocation noted.



Respondent (with lpr ref)	Response	Council Response
	<p>The original site promotion has been radically reduced inline with previous comments and is considered acceptable. Its linear form will ensure the pattern of development on the northern side of East lane is continuous and sympathetic to the village. The detail within an application will be important and in particular the northern boundary treatment with the field. A landscape buffer other than a hedge would not be appropriate and we are pleased not to see a large buffer included.</p>	
<b>Other stakeholders</b>		
Mr & Mrs Avery (lpr49)	<p>Having viewed the draft plan by the council I am writing to voice our concerns with this proposal. In our view development of the land as set out in the draft plan is completely inappropriate. There are a number of features and considerations that make this identified area unsuitable for development as outlined below.</p> <p><b>Character of the village</b></p> <p>The character of the village is subject to protection by the terms of the ANOB designation. An important part of that character is the maintenance of the rural vistas. East Lane is an important route of access to the village and the proposal will change the presentation from one that is rural to one that is essentially urban. This is not consistent with the ANOB designation.</p> <p><b>Safety</b></p> <p>East Lane is a narrow country lane. The proposal will inevitably mean more traffic and the likelihood of obstruction of access. This is particularly important as the doctors surgery is sited opposite the western end of the proposed site. There are already difficulties with obstruction around the surgery and the proposal will exacerbate these problems. Furthermore the entrances at either end of East Lane are difficult junctions and there have already been a number of serious accidents, particularly at the junction with the Old Oxford Road.</p>	<p>Comments noted.</p> <p><u>Character of the village:</u></p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development – it would not be possible to repeat the linear pattern of the rest of Chieveley without developing along the rural road to the east, which would harm the countryside setting on the east side of the village.</p> <p>In light of the recommendations of the LSA, only a small amount of linear development is proposed along the frontage of East Lane.</p> <p>The Local Highway Authority does not object to accesses off East Lane.</p> <p><u>Safety:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Environmental impact</b></p> <p>The proposed site is along the road/field boundary currently occupied by a hedge containing a number of ancient trees. The hedge would meet the criteria for protection under the Hedgerow Regulations 1997 due to it's length, location, because it contains endangered/protected species and because it forms the boundary of Glebe land. The hedge line is home to a number of important species such as bats, hedgehogs, birds (including owls) and also facilitates the movement of these species and others including deer. The proposal will clearly have a very significant adverse impact on these animals</p> <p><b>Infrastructure</b></p> <p>Chieveley has already seen significant expansion over the last 20 years and it is clear that aspects of the existing infrastructure struggle to cope with the current population level. Of particular concern is the level of medical coverage. The current doctor's practice already has difficulty in maintaining an appropriate level of service, this will be compounded by the proposals to designate areas for housing in Compton which this practice also covers. There are also concerns with the provision of local school places and as previously outlined, the existing road structure. We are also concerned that the proposal to allocate this land for housing will be on top of the land already available at Bardown which is currently underutilised. Should this also be developed the population increase would not only break the existing infrastructure but would fundamentally change the character of the village.</p> <p>In conclusion, in our view, this particular site has numerous issues that render it unsuitable for residential or mixed use development.</p>	<p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p><u>Environmental impact:</u></p> <p>There is no ancient woodland within the site or on the site's boundaries. Nor are there any trees subject to a Tree Preservation Order.</p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></i></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Infrastructure:</u></p> <p>Existing pressure on some local services and facilities is recognised, such as GP surgeries. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new</p>

Respondent (with lpr ref)	Response	Council Response
		<p>population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure could be sought through CIL</p>
Ray Baker (lpr24)	<p>Disagree with the proposed allocation.</p> <p>Very concerned with regard the additional traffic onto East lane as there is no foot path and is already a busy road due to the growing use of the Doctors surgery. Many people using this road race up and down[ to possibly get to appointments ] and with older people and young children walking on a road with no footpath it is proving a worry and if you build 15 homes with access onto this road that could add up to 60 car movements a day in addition. We also have a problem with people parking outside the surgery-pharmacy which causes a bottleneck and forces walkers into the middle of the road.</p> <p>A footpath would have to be installed before any consideration of additional homes-traffic as the likelihood of an accident would increase dramatically.</p> <p><b><i>What changes are you seeking / what would be your preferred approach?</i></b></p> <p>A FOOT PATH AND NO PARKING ON THE EAST LANE ROAD</p>	<p>Comments noted.</p> <p><u>Additional traffic:</u></p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Infrastructure:</u></p> <p>Existing pressure on some local services and facilities is recognised, such as GP surgeries. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new</p>

Respondent (with lpr ref)	Response	Council Response
		<p>population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure could be sought through CIL.</p> <p><u>Footpath:</u></p> <p>The policy for the allocation will include a requirement for a footway fronting the site as follows:</p> <p><i>c. A footway fronting the site that links to the existing footway to the west of the site.</i></p>
Andrew Bower (lpr52)	<p>Disagree with the proposed allocation.</p> <p>This may not be the right time in the process to put forward our thoughts and feelings but given that we know nothing about how the process works, lockdown has not allowed us to talk with our neighbours or anyone that could give us guidance, please forgive our lack of understanding.</p> <p>This is land and outside the village settlement and an area of outstanding natural beauty. If the land is to lose its protection we would like to see the look of the lane preserved. That is of individually designed homes set back from the lane with ample parking and in a pretty leafy country village. It would be very sad to see urban footpaths and street lighting.</p> <p>The hedge to the south of the site is a feature of the lane and gives that country village feel to the lane and the village. It also holds back the rain water from the field that is in some parts 1meter higher than the road surface. Flooding would be concern should it be removed. When heavy rain falls in the High Street the drains in East Lane overflow and the lane</p>	<p>Comments noted.</p> <p><u>Location of site outside of village settlement / preservation of the look of the lane:</u></p> <p>As part of the preparation of the LPR the council has undertaken a Settlement Boundary Review .The settlement boundary criteria make clear that boundaries will include sites allocated through the Local Plan process.</p> <p>The policy for the site will include a criteria that requires that the development design and layout will be informed by a Landscape Visual Impact Assessment (LVIA):</p> <p><i>e. The development design and layout will be further informed by a full detailed LVIA.</i></p> <p><u>Location of site within AONB:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>becomes a torrent. Many of the bungalows to the south of the lane would be at risk of flooding if this water was any deeper.</p> <p>We would not want the existing homes on the south of the lane to loose any of their land to enable a road realignment to facilitate the added traffic and parking created by added development.</p> <p>Any new dwelling built here will be in the very best of locations we would like to see it add to the look of the lane and the village rather than detract from it. The proposed plots would be slightly smaller than the existing and on a deceptively sharp bend in the lane given that all vehicles associated with the building and occupation of the new dwelling will need to be parked on site, as there is no on street parking in the lane 15 dwellings may be a bit of a squeeze.</p> <p>The population continues to grow at an alarming rate housing is needed everywhere equally at the other end of the scale people die. This is church land and outside the village settlement. The village grave yard is nearing fullness, this land was proposed to become the new grave yard for the village. If we are to loose an area of outstanding natural beauty this would be the better option for the people of the village for today and the future.</p>	<p>The National Planning Policy Framework is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. To this end, a Landscape Sensitivity Assessment was carried out for the wider site area that was promoted for development. This advised against development across the whole site because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p> <p><u>Flood risk:</u></p> <p>The Environment Agency's surface water flood risk data does not show the site nor any of the properties along the south of East Lane to be at risk of surface water flooding.</p> <p>The emerging draft LPR policy on flood risk requires that on all development sites, surface water will be managed in a sustainable manner through the implementation of sustainable drainage systems.</p> <p><u>Road realignment:</u></p> <p>There are no proposals to re-align East Lane, and the Local Highway Authority have not advised that the road needs re-aligning.</p> <p><u>Church land / burial ground:</u></p> <p>The site was promoted to the Council by the landowner, the Diocese of Oxford.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>At the time of the Regulation 18 consultation on the draft emerging LPR, West Berkshire Council (WBC) were unaware that the burial space available at St. Mary's Church was running out.</p> <p>As part of their Regulation 18 representations, the landowner of proposed allocation 'Land at Chieveley Glebe' suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommended that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>In light of the recommendations of the LSA, only a small amount of linear development is proposed along the frontage of East Lane.</p>
Stephen Crundwell (lpr47)	One of the reason I moved to my property was that it was not overlooked and has views of the fields at both the front and rear giving me the privacy I was looking for. My privacy will be compromised as I will be overlooked by many of the proposed properties. This would also impact my visual amenity in this area of outstanding natural beauty. There are also ancient hedgerows	<p>Comments noted.</p> <p><u>Overlooking / privacy:</u></p> <p>National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>beside this land and the road on East Lane which is used by many birds as observed by myself some birds nesting in this stretch of hedgerow.</p> <p>For a small village I feel the traffic on East lane is already excessive due to people who live outside the village using the Downland Doctors Surgery. More houses will increase the road traffic and as I haven't seen any plans for the buildings I would wonder if there are driveways for their cars or would they park on East Lane causing more issues.</p> <p>East lane suffers from surface water when it rains and this also causes large areas of water to form in my driveway even though my drive is gravel. The proposed land is also much higher than that of the level of the road and I feel that if this development goes ahead the rain water that is already being dispersed in the field will be vastly reduced causing more surface water on the road and will ultimately find its way in my boundary causing more of a nuisance.</p> <p>On the West Berkshire council website a Landscape Charter Assessment was undertaken by Kirkham Landscape planning ltd and The Terra Firma Consultancy Ltd for development on this site in 2011. <a href="https://info.westberks.gov.uk/lca">https://info.westberks.gov.uk/lca</a> In the report it states</p> <p>Impact on Key Visual Characteristics.</p> <ol style="list-style-type: none"> <li>1. Localised impact on views to the countryside from the village</li> <li>2. Loss of the open countryside setting of the village</li> <li>3. Development would be prominent in views from the road and countryside to the north.</li> </ol> <p>Impact on key settlement characteristics</p>	<p>privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Hedgerows / birds:</u></p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation</u></i></p>



Respondent (with lpr ref)	Response	Council Response
	<p>1. Development of this whole site would be out of keeping with existing settlement pattern, which is characterised by small estates, with houses closely associated with the main roads</p> <p>in the report it also states that Development on this site would result in harm to the natural beauty of this area of outstanding natural beauty and that this site as a whole should not be pursued as a SHLAA site. It would not be possible to repeat the linear pattern of the rest of Chieveley without developing along the rural road to the east, which would harm the countryside setting on the east side of the village</p> <p>In the response to the west Berkshire Landscape Sensitivity Assessment dated March 2011 all the observations were agreed with and it was considered inappropriate for development and should not be pursued as a SHLAA Site.</p> <p>As this proposed site has already been assessed previously and the conclusion was that it should not even be considered for development then I would like to know why it is being proposed for development now.</p>	<p><u>measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Traffic:</u></p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Infrastructure:</u></p> <p>Existing pressure on some local services and facilities is recognised, such as GP surgeries. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new</p>

Respondent (with lpr ref)	Response	Council Response
		<p>population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure could be sought through CIL.</p> <p><u>Surface water:</u></p> <p>The Environment Agency's surface water flood risk data does not show the site nor any of the properties along the south of East Lane to be at risk of surface water flooding.</p> <p>The emerging draft Local Plan Review policy on flood risk requires that on all development sites, surface water will be managed in a sustainable manner through the implementation of sustainable drainage systems.</p> <p><u>Landscape assessment:</u></p> <p>The 2011 Landscape Sensitivity Assessment (LSA) considered the wider area of land promoted for development. The LSA concluded that the site as a whole should not be developed because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p>
Bob & Joy Eastaugh (lpr57)	Having viewed the draft plan by the council I am writing to voice our concerns with this proposal. In our view development of the land as set out in the draft plan is completely inappropriate. There are a number of features	<p>Comments noted.</p> <p><u>Character of the village:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>and considerations that make this identified area unsuitable for development as outlined below.</p> <p><b>Character of the village</b></p> <p>The character of the village is subject to protection by the terms of the ANOB designation. An important part of that character is the maintenance of the rural vistas. East Lane is an important route of access to the village and the proposal will change the presentation from one that is rural to one that is essentially urban. This is not consistent with the ANOB designation.</p> <p><b>Safety</b></p> <p>East Lane is a narrow country lane. The proposal will inevitably mean more traffic and the likelihood of obstruction of access. This is particularly important as the doctors surgery is sited opposite the western end of the proposed site. There are already difficulties with obstruction around the surgery and the proposal will exacerbate these problems. Furthermore the entrances at either end of East Lane are difficult junctions and there have already been a number of serious accidents, particularly at the junction with the Old Oxford Road.</p> <p><b>Environmental impact</b></p> <p>The proposed site is along the road/field boundary currently occupied by a hedge containing a number of ancient trees. The hedge would meet the criteria for protection under the Hedgerow Regulations 1997 due to its length, location, because it contains endangered/protected species and because it forms the boundary of Glebe land. The hedge line is home to a number of important species such as bats, hedgehogs, birds (including owls) and also facilitates the movement of these species and others including deer. The proposal will clearly have a very significant adverse impact on these animals</p>	<p>The National Planning Policy Framework is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. To this end, a Landscape Sensitivity Assessment was carried out for the wider site area that was promoted for development. This advised against development across the whole site because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p> <p><u>Safety:</u></p> <p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p><u>Environmental impact:</u></p> <p>The site was promoted through the ‘call for sites’ for the Council’s Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Infrastructure</b></p> <p>Chieveley has already seen significant expansion over the last 20 years and it is clear that aspects of the existing infrastructure struggle to cope with the current population level. Of particular concern is the level of medical coverage. The current doctor's practice already has difficulty in maintaining an appropriate level of service, this will be compounded by the proposals to designate areas for housing in Compton which this practice also covers. There are also concerns with the provision of local school places and as previously outlined, the existing road structure. We are also concerned that the proposal to allocate this land for housing will be on top of the land already available at Bardown which is currently underutilised. Should this also be developed the population increase would not only break the existing infrastructure but would fundamentally change the character of the village.</p> <p>In conclusion, in our view, this particular site has numerous issues that render it unsuitable for residential or mixed use development.</p>	<p>Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></i></p> <p><u>Infrastructure:</u></p> <p>Existing pressure on some local services and facilities is recognised, such as GP surgeries. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership</p>

Respondent (with lpr ref)	Response	Council Response
		<p>with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure could be sought through CIL.</p>
Lucy Lubbe (lpr38)	<p>I think some more affordable family homes in the village and local areas is a good. 3 or 4 bed houses, semi-detached or detached, family homes to keep families local and help populate the local schools. Chieveley currently is made up from a large number of larger, more expensive houses so this would help balance out the village.</p>	<p>Support for allocation noted.</p>
Bradley Merchant (lpr51)	<p>Whilst I can appreciate that considerable time and effort has been spent on the consultation document, it would appear that the choice of the 'allocated' site proposal has not been investigated thoroughly before the proposed site is announced.</p> <p>The Local Council do not have the right to propose development on East Lane in the location identified as the site is outside of the village settlement boundary and therefore cannot be developed under current legislation. Should WBCC wish to negotiate changes to the village settlement boundary then this should take place before any discussions of development are entertained.</p>	<p><u>Location of site outside of village settlement boundary:</u></p> <p>As part of the preparation of the Local Plan Review (LPR) the Council has undertaken a Settlement Boundary Review. The settlement boundary review criteria make clear that boundaries will include sites allocated through the Local Plan process.</p> <p>Settlement boundaries help direct development to those areas where there are opportunities for infill development and for re-use of brownfield land. Further greenfield allocations are however needed, and the plan seeks to allocate a range of sites of varying sizes.</p> <p><u>Road safety:</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>In addition to the above, attention must be drawn to the current safety issues on East Lane which should be solved before issuing any proposal to add dwellings.</p> <p>I have lived in East Lane since 1974 and have witnessed a steady deterioration in the quality of life throughout this period due to:</p> <ul style="list-style-type: none"> <li>• The development of Hazeldene</li> <li>• The Downlands Practice</li> <li>• The increased number of vehicles using the roads (in general) and the speed in which they travel</li> </ul> <p>East Lane was once a quite village lane that allowed us, as children, to play safely in the countryside, climb the trees, ride bikes and walk safely at the side of the road, something not now afforded to our children, today. The constant flow of cars that visit the surgery for appointments, the medical delivery vans and the increased quantity of cars owned by residents (most of which drive at speeds in excess of the speed limit) make the road a very busy and dangerous lane now. Additional dwellings in the numbers planned will increase the quantity of vehicles, thus increasing the danger and increasing the likelihood of a serious accident.</p> <p>East Lane is increasingly affected by the insufficient parking provision caused by the scale of which The Downland Practice has grown, when permission was granted for the construction of the surgery on East Lane, it was intended as a village service with a calculated parking provision to accommodate the parish constituents, this has been exceeded many times over by the increased number of users from an ever-expanding catchment. Indeed, The Surgery was never intended to be the size it is now and has outgrown the site. The parking problems are known, worsening and create a significant hazards and danger for walkers on East Lane in particular families with young children, families with push chairs, children on bikes and scooters, dog walkers, Wheelchair users and Mobility scooters. The plan to add houses in Chieveley and the surrounding villages only increases the</p>	<p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Brownfield sites:</u></p> <p>In regards to the development of brownfield sites, when determining which new sites to allocate the Council are only able to consider land that is submitted to them through the Housing and Economic Land Availability Assessment (HELAA, one of the evidence documents for the LPR). The HELAA includes brownfield sites that the Council are aware of.</p> <p>The supporting text to policy SP12 (Approach to Housing delivery) of the emerging draft LPR identifies that several sources will ensure a continuous supply of land across the plan period. These include amongst others, existing planning commitments (unallocated sites with planning permission), many of which are brownfield sites.</p> <p>Policy SP1 (Spatial Strategy) of the emerging draft LPR makes it clear that in order to meet the Council's housing</p>

Respondent (with lpr ref)	Response	Council Response
	<p>number of vehicles visiting the Practice, where they are already unable to park and will be further complicated by the addition of more dwellings, all of which would bring additional vehicles, additional deliveries, and further confusion to the situation.</p> <p>East Lane has a straight clear stretch of road from the junction at Oxford Rd, allowing excess speed followed by a blind bend into a chaotic, congested parking arrangement outside of the surgery. It is already dangerous to cars and lethal to walkers - nothing positive can be achieved to resolve the existing problems by the inclusion of more dwellings and the increase of residents within the catchment. Logic could however be granted to the idea to add dwellings in East Lane if the Downlands Practice were to be relocated – the Showground being an ideal site.</p> <p>It is understood that Chieveley must consider an increase in housing to satisfy an increase in demand, but for all the available sites within the village I would suggest that the decision to propose construction on East Lane is poorly considered, narrow minded and short sighted. Thorough evaluation is needed to fully appreciate the current use of East Lane to allow clarity before this process commences.</p> <p>Other more appropriate Brownfield Sites, not included within the consultation document, but within the settlement boundary should be considered in more detail first before overloading East Lane. Bardown was a perfectly suitable housing estate before demolition, albeit in a state of disrepair. To redevelop that site would improve the area of the village with little or no impact on the busy areas of the village.</p> <p>Aside the visual impact of housing on an agricultural aspect, including trees that are decades old, there is good reason that the land has not been developed for housing during previous opportunity.</p> <p>The land proposed for housing development is also sought after by the parish for an extension to the village cemetery, which coupled with a parking</p>	<p>requirement development on Greenfield sites on the edge of settlements is necessary. Sensitive design will be important to respect and enhance the character and appearance of the area.</p> <p>Whilst planning permission was granted for residential development at Bardown, the permission expired and no further planning application for development has since been submitted.</p> <p><u>Burial ground:</u></p> <p>At the time of the Regulation 18 consultation on the draft emerging LPR, West Berkshire Council (WBC) were unaware that the burial space available at St. Mary's Church was running out.</p> <p>As part of their Regulation 18 representations, the landowner of proposed allocation 'Land at Chieveley Glebe' suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>facility for the Surgery would make very sensible use for any land made available for development. We cannot accommodate additional housing on East Lane <u>with</u> the existing facilities in place for The Downland Practice – one or the other.</p>	<p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p>
Oliver Reichardt (lpr115)	<p>Disagree with the proposed allocation.</p> <p>Chieveley village has some unique transport characteristics which are dangerous and would never be allowed now. For example the main street has pedestrian exits from houses which step straight into the road. It has vehicle exits straight onto the road which are blind to oncoming traffic. The street narrows so that it can only accommodate a single car at one point which is on a blind bend. It narrows to a single lane at multiple other points, including for a significant distance which causes queueing when busy.</p> <p>While these things give the place character, they are only acceptable in terms of safety if there is a low level of traffic. Unfortunately the increase in traffic over the years has made it dangerous. Any extra housing only increases the danger, and 15 dwellings would be a significant increase in traffic.</p> <p>It could be argued that the majority of these dwellings would use East Lane and Oxford Road when driving, and while this may happen to some extent, it is bound to drive up traffic through the village as well.</p> <p>My preferred approach would be to put safety first, and to look how dangerous the high street already is before more dwellings are added. There are many, many places in West Berkshire that have a better road system and dwellings should be put in these places first, rather than add more pressure on an already dangerous high street.</p>	<p>Comments noted.</p> <p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p>
Sharon Riddell (lpr918)	<p>Disagree with the proposed allocation.</p> <ul style="list-style-type: none"> <li>• destruction of rural setting and an extremely old hedge that hosts multiple wildlife</li> </ul>	<p>Comments noted.</p> <p><u>Disruption of rural setting:</u></p>



Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• light pollution</li> <li>• overlooking</li> <li>• destruction of current lane usage - do not want to see East Lane being used as a 'rat run'</li> <li>• overload on local doctors surgery</li> <li>• overload on schools</li> <li>• drainage issues and flooding</li> </ul> <p><b><i>What changes are you seeking / what would be your preferred approach?</i></b></p> <p>no building</p>	<p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development – it would not be possible to repeat the linear pattern of the rest of Chieveley without developing along the rural road to the east, which would harm the countryside setting on the east side of the village.</p> <p>In light of the recommendations of the LSA, only a small amount of linear development is proposed along the frontage of East Lane.</p> <p><u>Impact on wildlife:</u></p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></i></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Light pollution:</u></p> <p>All street lighting will need to be designed in accordance with the guidance set out in the Council’s Quality Design SPD (part 5, External Lighting) to reduce instances of light pollution.</p> <p>The Local Plan Review includes a policy on</p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>Overlooking:</u></p> <p>National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Highways:</u></p> <p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Infrastructure:</u></p> <p>Existing pressure on some local services and facilities is recognised, such as GP surgeries. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of</p>

Respondent (with lpr ref)	Response	Council Response
		<p>the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure could be sought through CIL.</p> <p><u>Drainage issues and flooding:</u></p> <p>The site is not at risk of flooding.</p> <p>The emerging draft LPR policy on flood risk requires that on all development sites, surface water will be managed in a sustainable manner through the implementation of sustainable drainage systems.</p>
Tracy Snook (lpr2336)	<p>Accept it is important that some development takes place in a village for sustainability purposes and growth but 15 dwellings along the East Lane frontage with individual accessways will decimate an old hedgerow, cause highway safety issues as near a bend in the lane, opposite a busy Doctor Surgery where patients park in the road to visit the pharmacy and doctors. The number of dwellings is excessive. 5 may be more appropriate and more in keeping with the location and consideration that driveway access are shared to limit impact on the highway.</p>	<p><u>Highways:</u></p> <p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>15 dwellings is over intensive development along that side of the lane compared to housing already present on that side. It will create a hard wall of building. Consideration should also be given to any housing in this location to not be full height to limit the impact on the environment and landscape aspect.</p> <p>The land would be suitable for access and parking for a new burial ground which Chieveley community expressed support for in the Parish Plan. The Parish Council are still trying to establish through discussions and contact with the Diocese on options in this regard. Any development permitted should accommodate and support the Parish Plan aspirations as part of development considerations or conditioned. In addition a footpath across the land from East Lane to the Recreational Centre land to improve off road infrastructure for cycle and walking around the village would be welcome.</p>	<p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p> <p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Dwelling numbers:</u></p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development – it would not be possible to repeat the linear pattern of the rest of Chieveley without developing along the rural road to the east, which would harm the countryside setting on the east side of the village.</p> <p>In light of the recommendations of the LSA, only a small amount of linear development is proposed along the frontage of East Lane. This is considered to be in keeping with the village.</p> <p><u>Burial ground:</u></p> <p>At the time of the Regulation 18 consultation on the draft emerging LPR, West Berkshire Council (WBC) were unaware that the burial space available at St. Mary's Church was running out.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>As part of their Regulation 18 representations, the landowner of proposed allocation 'Land at Chieveley Glebe' suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear development along East Lane to ensure that the existing settlement pattern is reflected.</p>
Councillor Tony Vickers (lpr984)	<p>Agree with the proposed allocation.</p> <p>Capable of accommodating 125 homes. The harm to landscape is minimal and we do not think having a ribbon type development is good use of the land.</p> <p>Increase the allocation to 100</p>	<p>Support for allocation noted.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north.</p> <p>The LSA recommends that the whole site would be unsuitable for development – it would not be possible to</p>

Respondent (with lpr ref)	Response	Council Response
		<p>repeat the linear pattern of the rest of Chieveley without developing along the rural road to the east, which would harm the countryside setting on the east side of the village.</p> <p>In light of the recommendations of the LSA, only a small amount of linear development is proposed along the frontage of East Lane.</p>
<b>Landowners, site promoters and developers</b>		
<p>Fisher German for M and W Musgrave and Begley (lpr1232)</p>	<p>Disagree with the proposed allocation.</p> <p>We welcome and support the Council's acknowledgement that Chieveley should receive residential allocations. This will assist to ensure its long-term vitality and vibrancy by meeting local housing needs. Whilst in the AONB, high quality new development which fits with existing settlements is considered to have a limited impact on this designation. The failure to deliver sufficient housing will however have very real impacts on the day to day lives of residents, forcing young people away due to rising house prices and lack of suitable available homes. Populations in rural areas will likely age, trends which can be seen locally and nationally, and average house occupancy will lower as children grow up and move away. This lowering and ageing of the rural population will have repercussions on the ability of services and facilities to stay open, which will lead to a gradual decline of sustainability. Chieveley has a high level of service provision, as demonstrated by the Settlement Audit, and this is something which must be supported by commensurate new housing, ensuring the vitality of the community.</p> <p>Concern is however raised at the Council's preferred choice of allocation, and it is not considered sufficient consideration has been had for the impacts of this scheme on the Chieveley Conservation Area and Grade II Listed Vicarage, as well as other listed buildings in the centre of Chieveley. The north of East Lane is the only open approach to the centre of Chieveley, its historic core. The development of this site will fundamentally change the</p>	<p>Comments noted.</p> <p><u>Heritage impact:</u></p> <p>The Council is in the process of preparing Conservation Area Appraisals. The site allocation policy will include a requirement for a Heritage Impact Assessment:</p> <p><i>g. The development design and layout will be further informed by a Heritage Impact Assessment.</i></p> <p><u>Highways impact:</u></p> <p>The Local Highway Authority provided comments on the site as part of work on the Housing and Economic Land Availability Assessment and site assessment work. No concerns were raised around safety, although they have specified that to achieve the required sightlines, accesses may be needed to serve more than one property.</p> <p>The dwellings would front onto East Lane, and a number of private accesses would be provided. The Local Highway Authority have not raised any objections to this.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>transition into the village, reducing the sense of openness prior to arriving at the village's central crossroads, creating a more urban feel.</p> <p>This part of East Lane already has issues with on street parking associated with the centre of Chieveley, the existing housing and where the GP practice's car park overflows. New housing in this location will add to the burden, by adding to the number of cars parked here and forcing on-street parking onto the south side of the road to facilitate access to the dwellings. This will cause issues both in terms of traffic, but also in terms of having a damaging impact on this important approach to the conservation area, further creating an urban feel and having a negative impact on the character of the settlement. Draft Policy SC8 sets out that development proposals that affect the setting of a Conservation Area should assess and clearly demonstrate how the character, appearance and significance of the Conservation Area will be preserved and enhanced. It does not appear that this has been undertaken to support this allocation. It is not appropriate to await a planning application, as the suitability of allocated sites is an issue that relates to this Plan's soundness and is vital to ensure the Plan is internally consistent.</p> <p>To facilitate the site, significant areas of mature hedgerow will need to be removed. This will have significant impacts on biodiversity, whilst further causing damage to the settlement character on the approach to Chieveley. The removal of such a large amount of mature, tall vegetation must be afforded significant weight, and serious concerns about the suitability of this allocation. It is noted that this is not even mentioned in the Site Proforma, which raises concerns to the extent that this has been considered in formulating the allocation.</p> <p>On the basis of the above, whilst we support the Council's decision to allocate in Chieveley, we do not support the Council's preferred choice and consider it should be deleted for the reasons listed above. We contend, that our client's land offers a suitable opportunity to allocate a smaller site, as has been the approach for the current draft allocation, although would be free from many of the constraints which impact the current allocation. It is</p>	<p>The Local Highway Authority have advised that they have no concerns regarding the provision of 15 dwellings with regards to traffic impact.</p> <p><u>Biodiversity impact:</u></p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England advised that the site was unlikely to have an impact on a Site of Special Scientific Interest, whilst there might be water quality impacts on the River Lambourn Special Area of Conservation which would need to be considered through the Habitats Regulations. BBOWT advised that a net gain in biodiversity must be delivered.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p>



Respondent (with lpr ref)	Response	Council Response
	<p>not clear why a smaller parcel of the allocated site has been considered, when this approach would clearly overcome many of the issues which form the basis of other site omissions.</p> <p>It is also noted that the draft allocation site is not currently available, as there is an ongoing lease for the land. Whilst this is only to 2023, it does mean that the site is not available now and cannot be used in five-year housing land supply calculations.</p> <p>In respect of our client's site, the Council's stage 1 sieving document concludes:</p> <p><i>"Development would result in harm to the AONB, and would be inappropriate in the context of the existing settlement form and pattern.</i></p> <p><i>Highways concerns about the lack of pedestrian route into Chieveley, and difficulties in providing one."</i></p> <p>Linear development similar to that allocated by the Draft Local Plan, on Graces Lane and/or East Lane would have no more impact in terms of harm to the AONB than the preferred allocation, and arguably even less so when having regard for the potential harm to historic designated assets associated with the current allocation. Linear development would also not be inappropriate in terms of existing settlement form and pattern, it would be entirely in accordance with the prevailing settlement form, which is frontage developments onto the existing road network. Whilst the highways concern is noted, it is clearly not a demonstrable issue for existing residents, and it would equally be applicable to the draft allocation, so cannot reasonably form a reason for exclusion.</p> <p>Development on our client's site would have a highly limited impact on the historic core of Chieveley, unlike the draft allocation, by virtue of being located away from the historic core of the settlement, its Conservation Area and Listed Buildings. Development here would also not impact on highways,</p>	<p><i>f. The scheme will be informed by an extended phase 1 habitat survey with further detailed surveys arising from that as necessary Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</i></p> <p>All development sites will be required to provide a minimum 10% net biodiversity gain as per policy SP11 (Biodiversity and Geodiversity).</p> <p><u>Alternative site (CHI20):</u></p> <p>Site CHI20 (Land adjacent to Oxford Road, Chieveley) was promoted to the Council as part of the call for sites for the Housing and Economic Land Availability Assessment (HELAA). The HELAA is one of the evidence documents for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>Site CHI20 was assessed as 'not developable within the next 15 years' in the HELAA, and it was therefore not subject to further site selection work.</p> <p>Development of the whole site would be out of keeping with the existing settlement pattern, which is characterised by houses closely associated with the main roads.</p> <p>The 2011 Landscape Sensitivity Assessment identified that the northern section of the site adjacent to the road is important open countryside at the entrance to the village, and would not be suitable for development. It went on to note that if the north west corner of the site was developed,</p>

Respondent (with lpr ref)	Response	Council Response
	<p>as on street parking is less of an issue here, and there isn't the pressure for parking from the services and facilities in the village centre.</p> <p>Whilst there would need to be some removal of hedgerow, it is considered the ecological impact would be far less than the draft allocation. Particularly so on land north of Graces Lane, as access could be gained from east of the public right of way, where there is only low-level scrub. This would have a significantly less impact than that proposed by the draft allocation. The removal of this vegetation is considered to have a limited impact on settlement character, unlike the removal of the mature vegetation on the draft allocation, which will have more significant impacts.</p> <p>On the basis of the above, it is considered that there is compelling justification to remove the allocation and replace it with land under our client's control. As referenced above, we do not consider sufficient justification has been provided as to why the Council have considered a smaller section of the draft allocation, and seemingly not any omission sites. This approach is prejudicial to those landowners whose sites have been excluded, as the approach taken has not been consistent. Clearly, we contend if that approach is adopted in respect of our client's land, there are two opportunities to allocate land (linear development along Graces and East Lane) which are demonstrably preferable to the Council's preferred allocation, for the reasons set out above.</p> <p>We also consider that land under our client's control can be allocated to assist and deliver any shortfall of housing land supply, particularly to assist in meeting any needs arising in respect of the Council's preferred allocations, particularly the strategic allocations. Despite being in the AONB, Chieveley is a sustainable settlement which can deliver a higher quantum of growth than is currently proposed, without causing any undue harm to the AONB.</p> <p>On the basis of the above, it is considered that there is compelling justification to remove the allocation and replace it with land under our</p>	<p>thus extending housing back from the roads, the straight, strongly vegetated edge of the settlement would be lost.</p> <p>As part of the assessment of the site within the HELAA the Local Highway Authority advised that a further pedestrian route is possible onto East Lane, but the footway would need to be completed along East Lane to link with existing footways to the west. However it is not possible to provide a convenient pedestrian route along Graces Lane into Chieveley which is a desirable pedestrian route. On this basis the Local Highway Authority advised that they did not support the site.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>client's control. As referenced above, we do not consider sufficient justification has been provided as to why the Council have considered a smaller section of the draft allocation, and seemingly not any omission sites. This approach is prejudicial to those landowners whose sites have been excluded, as the approach taken has not been consistent. Clearly, we contend if that approach is adopted in respect of our client's land, there are two opportunities to allocate land (linear development along Graces and East Lane) which are demonstrably preferable to the Council's preferred allocation, for the reasons set out above.</p> <p>We also consider that land under our client's control can be allocated to assist and deliver any shortfall of housing land supply, particularly to assist in meeting any needs arising in respect of the Council's preferred allocations, particularly the strategic allocations. Despite being in the AONB, Chieveley is a sustainable settlement which can deliver a higher quantum of growth than is currently proposed, without causing any undue harm to the AONB.</p>	
Diocese of Oxford (lpr1940)	<p>The Diocese of Oxford supports the allocation of the Land at Chieveley Glebe for up to 15 dwellings.</p> <p>There is a need for further burial space within the settlement and the Diocese will support the provision of the burial space on land north of East Lane and west of Oxford Road working in conjunction with the Parish Council, PCC and local vicar.</p> <p>As stated in the reps to the HELAA, the site will be available for the delivery of residential development in 6-10 years.</p>	<p>Support for allocation and need for additional burial space noted.</p> <p>The Diocese of Oxford has suggested that a burial ground could be accommodated within the wider area of land originally promoted for development.</p> <p>A Landscape Sensitivity Assessment (LSA) carried out in 2011 (which considers the wider area of land promoted for development) advises that the site is large in scale in comparison to the settlement, and extends further back from the roads than typical elsewhere. The LSA goes on to advise that the site has a strong relationship with countryside to the north, and development of the whole site would result in the loss of the open countryside setting of the village.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The LSA recommends that the whole site would be unsuitable for development because it would not be possible to repeat the linear pattern of the rest of Chieveley.</p> <p>The proposed allocation is for a line of linear residential development along East Lane to ensure that the existing settlement pattern is reflected. Access to the dwellings would be from East Lane.</p> <p>The Local Highways Authority has advised that vehicular access can be obtained via Oxford Road for the burial ground. The introduction of landscaping around the burial ground in addition to an access from Oxford Road through the site would impact upon the open countryside setting of the wider site. Officers therefore do not propose to amend the allocation to include a burial ground use.</p>

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR Policy: RSA27 Pirbright Institute Site, Compton (Site Ref: HSA 22)**

**(Proposed Submission LPR Policy: RSA18 Pirbright Institute Site, Compton)**

Number of responses received: 7

Respondent (with lpr ref)	Response	Council Response
<b>Internal consultee</b>		
Highways (lpr135)	<p>The policy is supported. This will be a worthwhile re-development of a previously developed site. However, it is important that sufficient supporting services are sustained for this relatively remote village location. Amenities for the Compton area that need to be provided or retained, and ideally enhanced include:</p> <ul style="list-style-type: none"> <li>• Doctors' surgery in High Street: does this have the capacity to support the additional residents?</li> <li>• Bus service 6 to/from Newbury (currently 2-hourly frequency Mon-Sat and no Sunday service)-retain and restore post-Covid, consider scope to enhance, perhaps linked in with the Didcot link bus mentioned below, or with current student-only services to/from the Downs School;</li> <li>• Additional bus connection to/from Didcot via Harwell Business Campus and also serving Didcot Parkway Station (with onwards connection available from there to Milton Park business estate), to ensure sustainable access to nearby employment and other opportunities from this otherwise isolated housing site;</li> <li>• Extension of good-quality, surfaced, segregated cycle- and pedestrian route up from Hampstead Norreys to Compton, using the</li> </ul>	<p>Comments noted. The Local Plan policies seek to retain and improve community facilities and services. No changes to this policy are required in light of this representation. These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

Respondent (with lpr ref)	Response	Council Response
	former railway alignment where possible, and with this ultimately being extended over the Downs to Upton and Didcot.	
<b>Statutory consultees</b>		
Environment Agency (lpr1674)	<p>We welcome the fact that no development will be permitted within Flood Zones 2 and 3, including essential infrastructure and water compatible development. This will ensure that flood risk is not increased elsewhere as a result of the proposed development.</p> <p>The headwaters of the River Pang flow parallel to the southern boundary of the site, but there is a road between the river and the site. Any development should ensure no adverse impacts on the Pang, for example from contaminated surface water run-off.</p> <p>Similar to RSA 22, there are known groundwater infiltration issues in this area, which could cause the pumping station to discharge storm overflow outside of the permit. A more thorough investigation of the WWTW, and the sewer network is required. Without this, the development could contribute to, or be adversely affected by, unacceptable levels of water pollution in accordance with Paragraph 170 of the NPPF. Therefore, this allocation would cause the local plan to be found unsound in the future.</p>	Comments noted. No changes to this policy are required because the phase 1 and phase 2 Water Cycle Study have now been completed. These comments will inform the emerging draft Infrastructure Delivery Plan.
Historic England (lpr1581)	We support the requirement for an archaeological desk based assessment as a minimum and field evaluation if necessary to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted. No changes to this policy are required in light of this representation.
Thames Water (lpr1759)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace	Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows - <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u> These comments will inform the emerging draft Infrastructure Delivery Plan.

Respondent (with lpr ref)	Response	Council Response
	<p>delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p>	
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1881)	<p>MWBLAF welcomes the statements in the policy and supplementary planning document (SPD) on the creation of links for non-motorised users. The SPD states that the public footpath across the site was diverted in 2003, presumably because the Pirbright Institute was then an integrated industrial/research facility. Now that this is no longer the case, the historic route of this footpath should be reinstated.</p> <p>It is unclear why the beginning of this item refers to both footpath and pedestrian links. Is there a difference?</p> <p>The Forum recommends the following changes: (vii) Footpath, bridleway and pedestrian links will be created throughout the site to improve connectivity with the wider existing network and to provide linkages between the village centre and the site. <del>The opportunity to reinstate the former east/west public footpath through the site should be reinstated explored and the adjacent line of trees and remnants of the hedgerow should be retained.</del></p>	<p>Comments noted. These comments will inform the emerging draft Infrastructure Delivery Plan.</p> <p>The Policy will be amended as follows: 'Footpath <u>and</u> bridleway and pedestrian links will be created throughout the site to improve connectivity with the wider existing network and to provide linkages between the village centre and the site. <del>The opportunity to reinstate the former east/west public footpath through the site should be reinstated and the adjacent line of trees and remnants of the hedgerow should be retained. In re-explored. If feasible, access for residents to Compton Primary School and/or The Ilsleys Primary School should be provided.</del></p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr985)	The policy is supported.	Comments noted. No changes to this policy are required in light of this representation.
<b>Landowners, site promoters and developers</b>		

Respondent (with lpr ref)	Response	Council Response
Homes England (lpr2209)	<p>Homes England are the landowner of the former Pirbright site in Compton following the transfer from the Department for Business, Energy and Industrial Strategy (BEIS). As a former agricultural research station, the site has a complicated history and legacy of contamination relating to the previous use. As such, and as can often be the case with previously developed/brownfield sites, the costs of unlocking the development potential are significant.</p> <p>Homes England submitted a planning application (ref. 20/01336) in June 2020. We continue to work proactively with Officers and statutory consultees to address objections and to develop a proposal that is capable of being granted planning permission.</p> <p>Our clear aspiration is to develop a scheme which delivers housing, including policy compliant affordable, within a development which is well designed and responds to the landscape and ecological constraints, providing a betterment in respect of biodiversity. The Homes England approach to the selection of development partners has evolved in recent years, increasing the expectation and focus placed on delivery high quality design and placemaking thus ensuring the commitment to a positive outcome and legacy.</p> <p>We continue to support the principle of the allocation of the site. Despite this, as is being considered through the current planning application, there is a strong case to demonstrate that the current allocation for approximately 140 homes unduly caps the development potential for the site which potentially renders it undeliverable when considered in the context of the costs involved in unlocking the site. It is acknowledged that the previous examination of the policy concluded that the site could be deliverable at this level of housing, however this was to some extent based on details that are arguably now out of date, particularly in respect of the true costs of remediation, and as such the housing level would not be as robust if re-examined now.</p> <p>In particular, it is a recognised that the consideration of deliverability/viability assessments at Plan Making stage are, by their nature, high level, albeit are required to consider the costs of development.</p> <p>Since the site was allocated, via the development of the current planning application, significantly more information is available to understand the extent of work required to facilitate development on the site. Specifically, this</p>	<p>Comments noted.</p> <p>Outline planning permission has been granted for 160 dwellings on the developable area identified by policy HSA23 under planning application 20/01336/OUTMAJ. As this is an 'in principle' approval, rather than full approval, where the quantum of development could still be amended, and in recognition of the work undertaken in developing the Supplementary Planning Document for the site, and the most recent Compton Neighbourhood Development Plan, which now forms part of the development plan, the policy will remain in allocating 'approximately 140 dwellings'. This is considered to provide flexibility in the policy, as demonstrated in the decision maker's consideration of the planning application.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>relates to a more detailed understanding of the extent and nature of contamination on the site together with the methods and costs involved in remediation. On this basis, in the context of the National Planning Policy Guidance (PPG), it is important to ensure that the future allocation is predicated on realistic, up-to-date information.</p> <p>In light of the above, we support the principle of rolling forward the site allocation given the significant potential for it to make a positive contribution across a range of issues and the advanced stage at which the application has reached. However, as currently adopted, we consider that the policy risks unduly constraining development and in turn potentially fails to accord with the principle of making best use of previously developed land and is no longer appropriate in the context of the available evidence on the costs of unlocking the potential through demolition and remediation.</p> <p>Our response to Question 3 sets out how we consider the policy/allocation could be amended to ensure delivery.</p> <p>We seek a flexible approach to how the quantum of development allowed for on the site is set out in Policy.</p> <p>We consider that the allocation should be more closely aligned to the principles set out in the National Planning Policy Framework (NPPF2019) in respect of previously development land. Specifically, the policy, should be revised to ensure that the redevelopment potential is maximised i.e. best use is made. The NPPF is clear in this regard, in particular paragraphs 117 and 118 (our emphasis):</p> <p><b>117 Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.</b></p> <p><b>118 1c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;</b></p> <p>(NB the 2021 NPPF revision consultation updates the paragraph numbers (each moves on one) but not the substance)</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>Furthermore, there is an expectation within the PPG that (our emphasis) <b>“plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers.”</b> (ID: 10-002-20190509).</p> <p>We do not suggest that amendments should result in the removal of criteria for how the development is managed. Rather, we consider that the technical opportunities and constraints should inform the development alongside an understanding and appreciation for what redevelopment would look like in the context of the existing built form of the village.</p> <p>The Development Management process is well placed to undertake this exercise, as evidenced by the current planning application. A particular example of how this approach works, and thus is appropriate, is in respect of landscape. The consultee response to the application raised concerns, amongst others, about the potential development of Area A to the north of the site and the impact on the Area of Outstanding Natural Beauty. As a result of this, we are currently undertaking work to revise plans to respond to concerns and will present these as an update to the application in due course.</p> <p>For this reason, it is entirely appropriate to amend the policy to ensure that there is flexibility in terms of the development capacity. This would support the Council in terms of overall housing delivery, protecting Compton from potential green field speculative applications outside of the built form of the village together with flexibility on overall development numbers ensuring the ability to maximise the affordable housing provision, thus supporting younger generations in their desire to remain within Compton.</p> <p>Such amendments, rather than ceding control of the development and design process, would ensure that the site is capable of being brought forward in the context of the constraints, including remediation costs, allowing a scheme to be delivered which accords with NPPF2019 paragraphs 117 and 118.</p> <p>Homes England remain committed to working collaboratively with Officers to develop a proposal for the site that meets the wider aspirations of the Council, community and ourselves. As well as continued positive</p>	

Respondent <i>(with lpr ref)</i>	Response	Council Response
	engagement with Officers through the Development Management process, we continue to seek the same positive engagement through Policy making, as envisaged by the PPG, to ensure we are able to support the development of a realistic, deliverable allocation.	

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA28 Land west of Spring Meadows, Great Shefford****(Proposed Submission LPR Policy: RSA19 Land west of Spring Meadows, Great Shefford)**

Number of responses received: 9

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Great Shefford Parish Council (lpr1855)	<p>The development is likely to be detrimental to the Parish in a number of areas:</p> <ol style="list-style-type: none"> <li>1. It will add cumulatively to existing flood impacts in the village. The area was withdrawn from the WBC Local Plan in the last review on this point alone – nothing has substantially changed since this</li> <li>2. Adding a number of dwellings (15+) to this end of the village will lead to additional foul/sewage system impacts and flood potential impacts. We had significant sewage issues last winter, despite years of Thames Water 'mitigation' in the valley. The issue is real and unresolved, and this development would add to it.</li> <li>3. The proposed development area is on substantially higher ground than the existing development and will have a significant impact on existing dwellings at this point in the village. It will also lead to an increased view of new development in the village from surrounding footpaths and the A338 as this height will make a new development here more prominent, creating a landscape impact in the AONB.</li> </ol>	<p><u>Flood impacts</u></p> <p>The existing Local Plan did not include any allocations in Great Shefford. This was because there has been significant flooding in the village when the Housing Site Allocations Development Plan Document (HSA DPD) was being prepared. Since then, there are proposals for a flood mitigation scheme within Great Shefford.</p> <p>As part of the preparation of the Local Plan Review (LPR), Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA) have been prepared which consider the site. Sites within Great Shefford were not specifically considered within the SFRA prepared for the Core Strategy or HSA DPD.</p> <p>The site itself lies within Flood Zone 1 whereby there is a low risk of flooding. The boundary of the site at its northern</p>

Respondent (with lpr ref)	Response	Council Response
	<p>4. The location is unsustainable, it is in a rural village with no substantial public transport links, our public transport has been gradually reduced by WBC over the last 20 years</p> <p>Great Shefford Parish Council agrees that the area of land at RSA 28 which is shown edged red on the inset plan for this site should not be developed.</p>	<p>corner is at low risk of flooding from a surface water flow path during a 1 in 1000 year rainfall event. Development would need to be avoided on this part of the site, and the allocation for the site will require this.</p> <p>Groundwater emergence modelling identifies that the north eastern corner of the site is predicted to be affected by groundwater emergence during a 1 in 30 year and 1 in 100 year event. Development would need to be avoided on this part of the site, and the allocation for the site will require this.</p> <p>The site allocation for the policy will require a Flood Risk Assessment as part of any planning application.</p> <p>In relation to flooding, the policy will read as follows:</p> <p><u>g. The scheme will be informed by a Flood Risk Assessment for the site. This is due to the presence of a surface water flow path flows across the northeast corner of the site, in addition to a small area of groundwater emergence in the north east corner of the site. Development will need to be avoided in this area;</u></p> <p><u>Foul / sewage system</u> A Phase 1 and Phase 2 Water Cycle Study have been prepared and will be reflected in the policy as follows</p> <p><u>i. An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within this catchment;</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;</u></p> <p><u>Landscape impact</u>                      A Landscape Sensitivity Assessment (2011) indicated that development on the site would not cause significant harm to the landscape character, and subject to a number of mitigation measures development would be acceptable. It is a small site that is well contained by landform and housing, with hedges along the western and northern boundaries. Development could be accommodated and retain small scale pattern and not intrude into the wider AONB. The site lies on the lower valley side, mostly below 115m AOD, with just the north corner rising slightly above.</p> <p>The policy will include the mitigation measures set out in the LSA and will also include a requirement for a Landscape and Visual Impact Assessment:</p> <p>d. <u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>• <u>Retention of the existing boundary vegetation;</u></li> <li>• <u>Buildings to be kept off the northern-most corner of the site; and</u></li> <li>• <u>New planting to integrate buildings into the landscape and soften the edge.</u></li> </ul> <p>e. <u>The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);</u></p> <p><u>Unsustainable location</u></p>

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		<p>The site is located adjacent to the settlement of Great Shefford, which is identified as a Service Village in the settlement hierarchy. Service Villages have a more limited range of services and some limited development potential.</p> <p>Policy SP1 (Spatial Strategy) of the Local Plan Review is clear that the focus of development in each spatial area will follow the District-wide settlement hierarchy set out in Policy SP3 which takes account of the function and sustainability of settlements.</p>
Savills (UK) Ltd for Thames Water (lp71767)	<p><b>Water response:</b></p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste response:</b></p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with</p>	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have been prepared and will be reflected in the policy as follows -</p> <p>i. <u>An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within this catchment; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

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	<p>Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p> <p><b>Additional comments:</b></p> <p>Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p>	
<b>General consultation bodies</b>		
North Wessex Downs AONB (lpr1620)	<p>Agree with the proposed allocation.</p> <p>The site relates well to the settlement pattern and would be well contained by the existing landform and housing. The site offers potential for development and would have only a localised impact on views from neighbouring properties but would not harm the landscape and scenic beauty of the AONB. Allocating the site for development would also provide an opportunity to soften the existing raw edge of the village.</p>	Support for allocation noted.
Mid & West Berks Local Access Forum (lpr1882)	<p>A public footpath runs to the west of this site, but is neither shown on the map nor mentioned in the policy. It appears that the boundary of the sites might cut diagonally across this footpath towards the north west of the site, but this may just be lack of precision in the drawing of the boundary.</p> <p>A hedgerow with trees currently separates this footpath from the site, which should be retained to keep the rural character of the footpath.</p> <p>The Forum recommends that the public footpath should be added to the map, so that it is clear that it is outside the boundary of the site (or not).</p> <p>We recommend that following sentence is added to the policy:</p>	<p>Comments noted. Public Right of Way GTSH/1/1 runs adjacent to the western site boundary. The policy will be updated to include a map, and the footpath will be included on the map.</p> <p>The policy will be updated to include criteria to guide the development of the site. The criteria will be informed, amongst others, by the recommendations of the 2011 Landscape Sensitivity. One of the recommendations of the LSA is for the retention of all existing boundary vegetation, and the criteria in the policy will read as follows:</p>



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	<p><b><u>The hedgerow with trees on the western boundary of the site should be retained, to maintain the rural character of the footpath that runs alongside this boundary.</u></b></p>	<p>d. The scheme will be developed in accordance with the <u>Landscape Sensitivity Assessment (2011)</u>:</p> <ul style="list-style-type: none"> <li>• <u>Retention of the existing boundary vegetation;</u></li> <li>• <u>Buildings to be kept off the northern-most corner of the site; and</u></li> <li>• <u>New planting to integrate buildings into the landscape and soften the edge.</u></li> </ul>
<b>Other stakeholders</b>		
Alexander Bell (lpr1851)	<p>On the previous plan, it was not recommended for allocation. What is different this time around?</p> <p>There is large ground water, even now the garden is saturated from the recent rains.</p> <p>The land that is being suggested for allocation of 15 houses is raised and much higher than that of the houses that border it by some few good metres.</p> <p>This will cause huge oversight and privacy issues, as well as all the houses that lie on the boundary an unattractive outlook.</p> <p>Privacy is lost, as well as garden views. No one wants a house looking down on another house.</p> <p>The suggested access via Spring Meadows is also of concern. 15 houses average of 30 additional cars using the road as access, that already has cars parked on the road and is school access.</p> <p>This should be re-addressed. Not to mention the change in land level, which I repeat is multiple metres from current Spring meadows to the land that is being allocated.</p>	<p><u>Flood risk:</u> The existing Local Plan did not include any allocations in Great Shefford. This was because there has been significant flooding in the village when the Housing Site Allocations Development Plan Document was being prepared. Since then, there are proposals for a flood mitigation scheme within Great Shefford.</p> <p>As part of the preparation of the Local Plan Review (LPR), Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA) have been prepared which consider the site. Sites within Great Shefford were not specifically considered within the SFRA prepared for the Core Strategy or HSA DPD.</p> <p>The site itself lies within Flood Zone 1 whereby there is a low risk of flooding. The boundary of the site at its northern corner is at low risk of flooding from a surface water flow path during a 1 in 1000 year rainfall event. Development would need to be avoided on this part of the site, and this will be specified within the policy for the site.</p> <p>Groundwater emergence modelling identifies that the north eastern corner of the site is predicted to be affected by groundwater emergence during a 1 in 30 year and 1 in 100</p>

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	<p>The landscape regardless of any planted boundaries will be affected, as these dwellings will sit so high in the skyline and the lie of the land in comparison to the rest of Spring Meadows.</p> <p>Flood alleviation works are proposed for the village, but when and what effect this will have is not yet determined.</p> <p>Many flood alleviations schemes have been put in that do not have the desired effect.</p> <p>Ground water run-off from the chalk hills, in this area of settlement on Spring Meadows will undoubtedly be affected by further housing on the land being allocated.</p> <p>Much consideration and investigation need to be put into this.</p> <p>Will the land be excavated to bring it down to the level of the other houses? If not, surely house cannot be built literally 'on top' of other houses, to look down into the gardens.</p> <p>Their ground floor will be level with the top floor or above of the existing houses that lie on the boundary.</p> <p>Things to note and things that will certainly need addressing:</p> <ol style="list-style-type: none"> <li>1. Ground Level</li> <li>2. Ground Water</li> <li>3. Water Run Off</li> <li>4. Existing dwellings privacy</li> <li>5. Existing road use</li> </ol>	<p>year event. Development would need to be avoided on this part of the site, and this will be specified within the policy for the site.</p> <p>The site allocation for the policy will also require a Flood Risk Assessment as part of any planning application.</p> <p>In relation to flooding, the policy will read as follows:</p> <p><u>h. The scheme will be informed by a Flood Risk Assessment for the site. This is due to the presence of a surface water flow path flows across the northeast corner of the site, in addition to a small area of groundwater emergence in the north east corner of the site. Development will need to be avoided in this area;</u></p> <p><u>Landscape impact</u> A Landscape Sensitivity Assessment (2011) indicated that development on the site would not cause significant harm to the landscape character, and subject to a number of mitigation measures development would be acceptable. It is a small site that is well contained by landform and housing, with hedges along the western and northern boundaries. Development could be accommodated and retain small scale pattern and not intrude into the wider AONB. The site lies on the lower valley side, mostly below 115m AOD, with just the north corner rising slightly above.</p> <p>The policy will include the mitigation measures set out in the LSA and will also include a requirement for a Landscape and Visual Impact Assessment:</p> <p><u>f. The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>• <u>Retention of the existing boundary vegetation;</u></li> </ul>

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	<p>6. Effect of the proposed dwellings on the flooding on Wantage Road (further hard standing and water run off downhill to the Wantage Road)</p> <p>I refer you back to the previous Local Plan, with all the comments made by residents and professionals, and that the previous Local Plan did not approve for allocation.</p> <p>It is not understood how this can change in 5 years to now make this site viable for development. This email is to object to the decision that the site is recommended for allocation as per the Local Plan to 2037.</p> <p>Reference to the HSA DPD and SEA which outlined reasons made by the Council for not previously allocating the site.</p> <p>I have seen no justification for why this reasoning has changed. This 2nd email is further to show my objection to the site being suitable for 15 dwellings.</p> <p>In addition to my objection to make reference to my statement please see here: <a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=43955&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=43955&amp;p=0</a>.</p> <p>Please go to page 51, and I highlight here in a snippet. It must be explained how this has changed since May 2017 [see attachment].</p> <p>[Para 2.47 of the Housing Site Allocations Development Plan Document (HSA DPD)] “...It is not proposed to allocate any sites in Great Shefford due to concerns over flood risk and recent severe flooding in the village.”</p> <p>Also, please see here previous comments and reasons for the site NOT being allocated, how has this changed? [see attachment from the</p>	<ul style="list-style-type: none"> <li>• <u>Buildings to be kept off the northern-most corner of the site; and</u></li> <li>• <u>New planting to integrate buildings into the landscape and soften the edge.</u></li> </ul> <p>g. <u>The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);</u></p> <p><u>Privacy / overlooking:</u> National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Access:</u> The Highways Authority provided comments as part of the Housing and Economic Land Availability Assessment (HELAA) and site assessment work. They advised that whilst the site does not appear to have direct access onto the public highway, if access can be obtained it would be obtained from Spring Meadows adjacent number 41.</p> <p>Except for the section fronting number 41, Spring Meadow is generally wide enough varying in width from 4.8 to 5.5 metres. However the section fronting 41 would be short. A footway would need to be provided from the development to the existing footway fronting 31. This is possible within the public highway.</p> <p>The site promoter has indicated that access is possible from the road along the northern boundary over land in the same ownership.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Sustainability Appraisal/Strategic Environmental Assessment of the HSA DPD].</p> <p>I have seen no justification why this reasoning has changed.</p>	<p>The policy for the site will require that access is taken from Spring Meadows:</p> <ul style="list-style-type: none"> <li>• <u>Access to the site will be provided from Spring Meadows. A footway will need to be provided from the development to the existing footway in Spring Meadow;</u></li> </ul> <p>The Local Highways Authority have not raised any concerns in relation to the impact upon the local highway network.</p>
Caroline Farrant (lpr45)	<p>Huge concerns with regard to access to the proposed site. Access through Spring Meadows would put increased pressure on an already 'busy' area with cars frequently partially blocking the road, school vehicles turning limited driveway parking. Access along the track on Wantage road provides its own issues as the A338 is very fast a visibility is poor to exit that track. Not only does access need addressing but the speed in which vehicles travel through the village.</p> <p>'Approximately 15 dwellings' could mean many more than that?</p> <p>when Spring Meadows was built there were massive issues with ground water, how will this be addressed.</p> <p>Such a pity WBC spot a little bit of land and want to fill it with housing.</p> <p><b>What changes are you seeking / what would be your preferred approach?</b></p> <p>I would prefer the land not to be used for any housing, because access to that area is virtually impossible.</p>	<p><u>Access:</u> The Highways Authority provided comments as part of the Housing and Economic Land Availability Assessment (HELAA) and site assessment work. They advised that whilst the site does not appear to have direct access onto the public highway, if access can be obtained it would be obtained from Spring Meadows adjacent number 41.</p> <p>Except for the section fronting number 41, Spring Meadow is generally wide enough varying in width from 4.8 to 5.5 metres. However the section fronting 41 would be short. A footway would need to be provided from the development to the existing footway fronting 31. This is possible within the public highway.</p> <p>The site promoter has indicated that access is possible from the road along the northern boundary over land in the same ownership.</p> <p>The policy for the site will require that access is taken from Spring Meadows:</p>

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		<p><u>'Access to the site will be provided from Spring Meadows. A footway will need to be provided from the development to the existing footway in Spring Meadow.'</u></p> <p>The Local Highways Authority have not raised any concerns in relation to the impact upon the local highway network.</p> <p><u>Dwelling numbers:</u> The final dwelling number will be informed by a Landscape Visual Impact Assessment.</p> <p><u>Groundwater:</u> Groundwater emergence modelling identifies that the north eastern corner of the site is predicted to be affected by groundwater emergence during a 1 in 30 year and 1 in 100 year event. Development would need to be avoided on this part of the site, and this will be specified within the policy for the site.</p> <p>The site allocation for the policy will also require a Flood Risk Assessment as part of any planning application.</p> <p>In relation to flooding, the policy will read as follows:</p> <p><u>g. The scheme will be informed by a Flood Risk Assessment for the site. This is due to the presence of a surface water flow path flows across the northeast corner of the site, in addition to a small area of groundwater emergence in the north east corner of the site. Development will need to be avoided in this area;</u></p>
Gareth Knass (lpr634)	Disagree with the proposed allocation.	<p><u>Landscape impact</u> A Landscape Sensitivity Assessment (2011) indicated that development on the site would not cause significant harm to the landscape character, and subject to a number of</p>

Respondent (with lpr ref)	Response	Council Response
	<p>I wish to <b>object</b> to this part of the proposed policy. The addition of this site as a housing site is contrary to existing and emerging Council policies, will impact significantly locally, and does not preserve the previous planning history for the site. I will set out my concerns in turn below:</p> <p><b>Landscape - contrary to Policy Area Delivery Plan Policy 5, CS19 and emerging policy SP2</b></p> <p>The site is currently outside of the curtilage of Great Shefford village and within the Area of Outstanding Natural Beauty (AONB). It should be noted that the ground steps up from the existing development at Spring Meadows so is approximately 2m above the level of existing housing at the eastern end and then banded at the western/north western end where a public right of way (PROW) runs on top of the bund. The development will be seen from a number of local PROW and from the A338, and as a result of the different levels will make a development here look out of place with the flow of the village, and contribute to the ribbon development along the A338 reducing the value of the AONB. It will also result in loss of view for the local primary school. For example, looking at the village from the PROW to Trindledown Copse, the roof level of a new development here would be significantly higher than the existing village.</p> <p>The AONB is a dark sky area. Historical residential development within Spring Meadows has resulted in an existing impact on this (it is one of the most lit parts of the village). New development with associated street lighting will add cumulatively to this impact. Local residents in the past have requested down time on the street lights in the village (eg between midnight -5am), but this was rejected by the Parish Council following public consultation. Provision of new LED lighting does not reduce the impact. The provision of lighting on higher ground in a new development would be detrimental to the local landscape.</p> <p><b>Flood Impact – contrary to Policy CS 16 and emerging policy SP6</b></p>	<p>mitigation measures development would be acceptable. It is a small site that is well contained by landform and housing, with hedges along the western and northern boundaries. Development could be accommodated and retain small scale pattern and not intrude into the wider AONB. The site lies on the lower valley side, mostly below 115m AOD, with just the north corner rising slightly above.</p> <p>The policy will include the mitigation measures set out in the LSA and will also include a requirement for a Landscape and Visual Impact Assessment:</p> <p>h. <u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>• <u>Retention of the existing boundary vegetation;</u></li> <li>• <u>Buildings to be kept off the northern-most corner of the site; and</u></li> <li>• <u>New planting to integrate buildings into the landscape and soften the edge.</u></li> </ul> <p>i. <u>The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA):</u></p> <p><u>Flood impact:</u></p> <p>The existing Local Plan did not include any allocations in Great Shefford. This was because there has been significant flooding in the village when the Housing Site Allocations Development Plan Document was being prepared. Since then, there are proposals for a flood mitigation scheme within Great Shefford.</p> <p>As part of the preparation of the Local Plan Review (LPR), Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA) have been prepared which consider the site. Sites</p>

Respondent (with lpr ref)	Response	Council Response
	<p>(1) Great Shefford has been subject to a number of flooding events in the last 20+ years, including flooding from the Great Shefford Stream that runs along the A338. The winter 2014 flood event resulted in closure of the A338 for a period, flooding of private dwellings, disruption to the village, loss of power, and failure of the sewage system from ground water and flooding ingress. Allowing new development in this location will exacerbate existing issues here, which have yet to be resolved. Further, a proposed plan for alleviation of the flooding with a new pipe diverting excess flow on the Great Shefford stream at times of flood is being delayed, with no firm agreement between all partners, or date of delivery yet provided. The previous housing delivery plan in the Local Plan rejected this site on this basis and despite efforts of the Great Shefford Flood Alleviation Association and Parish Council, this situation has not changed since that decision. Therefore it the site should not be added to this plan.</p> <p>The impact on flooding includes sewage issues, where by residents in Spring Meadows and the wider village have in the past been asked to reduce the use of private waste water services from dwellings in order to reduce the impact on those further down the system in the village where sewage is surcharging into properties and open spaces during high water and flood events. A new development here would significantly add to this impact and Thames Water have not been able to mitigate successfully despite sealing man holes and lining sewars in the local area. Last winter sewage issues in the lower part of the village were still significant.</p> <p>(2) In addition to flooding along the Great Shefford Stream, there is also potential for flash flooding, as occurred in 2007. This resulted in surface water run off flooding from high ground to parts of the village – a number of houses in the village were flooded as a result. Allowing a new development in this location will increase such flood risk potential onto existing adjacent properties, this is a concern given the higher level of the existing ground, its green field nature and potential for directional run off from a new road system connecting to the end of Spring Meadows. A development here would increase this flood risk locally.</p>	<p>within Great Shefford were not specifically considered within the SFRA prepared for the Core Strategy or HSA DPD.</p> <p>The site itself lies within Flood Zone 1 whereby there is a low risk of flooding. The boundary of the site at its northern corner is at low risk of flooding from a surface water flow path during a 1 in 1000 year rainfall event. Development would need to be avoided on this part of the site, and the allocation for the site will require this.</p> <p>Groundwater emergence modelling identifies that the north eastern corner of the site is predicted to be affected by groundwater emergence during a 1 in 30 year and 1 in 100 year event. Development would need to be avoided on this part of the site, and the allocation for the site will require this.</p> <p>The site allocation for the policy will require a Flood Risk Assessment as part of any planning application.</p> <p>In relation to flooding, the policy will read as follows:</p> <p><u>g. The scheme will be informed by a Flood Risk Assessment for the site. This is due to the presence of a surface water flow path flows across the northeast corner of the site, in addition to a small area of groundwater emergence in the north east corner of the site. Development will need to be avoided in this area;</u></p> <p><u>Wastewater:</u> A Phase 1 and Phase 2 Water Cycle Study have been prepared and will be reflected in the policy as follows</p>

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	<p><b>Biodiversity Impact – contrary to policy CS17 of the Local Plan and emerging policy SP11</b></p> <p>(1) The sewage system in the village is not able to cope with the existing load during periods of high rainfall and particularly high groundwater. Over the last 10 years alone there has been events that has resulted in raw sewage leaving the system and entering surface water systems in the village. This then means that the sewage will enter the River Lambourn which is an internationally rare chalk stream habitat protected under national legislation as a Site of special Scientific Interest (SSSI), and as a Special Area of Conservation (SAC). Under the Habitat Regulations 2017 (as amended) all plans and projects should be subject to an appropriate assessment of their impacts where there is a likely significant effect alone or in-combination with other plans or projects. Given that there is an existing impact on the River Lambourn SAC from sewage pollution events, the cumulative impact of additional residential development on the local sewage system will lead to increased cumulative impact. It should be noted that, through the Lambourn Valley Flood Forum, Thames Water, as mentioned above, have spent much time and effort seeking mitigation measures to reduce and avoid impacts as described above in the village. This has not to date been successful and the problem persists, and it is difficult to see how they will be able to separate the sewage system fully from ground water infiltration.</p> <p>(2) It is noted that the site had some thorn scrub adjacent to the school boundary removed around a decade ago, that provided habitat for farmland birds including Red Listed Birds of Conservation Concern. I have noted Yellowhammer, Linnet, Grey Partridge using the site. The protected reptiles, Slow Worm and Grass Snake have been noted locally and may use habitats within the field edges.</p> <p><b>Sustainability – contrary to emerging policy SP5</b></p>	<p>i. <u>An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy. Infiltration from groundwater into the network has been identified as a strategic issue within this catchment; therefore development on the site will connect to the mains sewerage system. A housing phasing plan will be required to ensure development does not outpace delivery of essential network upgrades to the East Shefford Sewage Treatment Works;</u></p> <p><u>Biodiversity impact:</u> The site was promoted through the ‘call for sites’ for the Council’s Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts.</p> <p>Natural England commented that there was the potential for development to have an adverse impact upon a Site of Special Scientific Interest, and that development may have an adverse impact on the integrity of a Special Area of</p>



Respondent (with lpr ref)	Response	Council Response
	<p>The site is not sustainable. There are very few options for public transport in the village, and these are in decline. At present only a small bus service route runs in the village. Any development would therefore be tied to car use, which is against existing and emerging policy on sustainability.</p> <p><b>Impact on Existing Dwellings – Contrary to emerging Policy DC 30</b></p> <p>(1) As already stated the land subject to the proposed policy is significantly higher than the existing development within Spring Meadows. Development will result in significant impact on existing dwellings as a result.</p> <p>(2) In order to supply pavement to this development there would require land take from existing front gardens and drives on either or both sides of the existing cul-de-sac at Spring Meadows. This will be resisted by local residents.</p> <p><b>Parking – contrary to emerging policy DC36</b></p> <p>The existing development on Spring Meadows did not provide sufficient off road parking for all dwellings, this is the case in the cul-de-sac section adjacent to the proposed policy site. There are bottlenecks and reduced access through necessary on street parking. Allowing development here and associated reduction in driveways of existing dwellings to create a pavement will exacerbate this issue, reducing the driveway lengths further below the standard in the emerging policy for the existing dwellings adjacent to the site.</p> <p><b>Affordable Housing – contrary to Area Delivery Plan Policy 5</b></p> <p>The last survey carried out by the Parish Council found no additional need in the village for affordable housing. New development recently permitted within the village curtilage has provided additional new dwellings locally.</p>	<p>Conservation through discharge, abstraction, construction, run-off/drainage.</p> <p>BBOWT commented that the site is within 1km of a Special Area of Conservation and development may not be appropriate. Habitat Regulation Assessment may be required. They also commented that the site is within 1km of a Site of Special Scientific Interest, development may not be appropriate</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirements will be as follows:</p> <p>f. <u>The scheme will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></p> <p>h. <u>The site lies within the hydrological catchment of the River Lambourn SSSI/SAC and the development must demonstrate nutrient neutrality. A Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged;</u></p> <p><u>Sustainability:</u> Policy SP1 of the LPR sets out the spatial strategy for the district. The overall approach to development will be based</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Site History – Contrary to Green Infrastructure Policy and Settlement Boundary principles</b></p> <p>When the Spring Meadows development was granted permission in 1999 the land under the current proposed policy was given to the village as recreation space (to be used as a Football club as long as there was need). When the club folded the changing facility was built on by the landowner precluding any future use for football. Despite this, locals used the field for informal recreation until the owner fenced this out. Objections to this were made at the time. Allowing development here will take away from the village the benefits of planning gain from a historical development and should be resisted.</p>	<p>on three spatial areas, one of which includes the North Wessex Downs AONB. The focus of development in each spatial area will follow the district-wide settlement hierarchy set out in policy SP3.</p> <p>Within the settlement hierarchy, Great Shefford is identified as a ‘Service Village’. Service Villages are smaller rural settlements which offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs.</p> <p><u>Impact on existing dwellings:</u> The Local Highway Authority has advised that A footway would need to be provided from the development to the existing footway fronting 31. This is possible within the public highway.</p> <p><u>Parking:</u> Development proposals will need to comply with LPR Emerging Draft LPR Policy DM36 (Parking).</p> <p><u>Affordable Housing:</u> The West Berkshire Housing Needs Assessment Update (July 2022) identifies that there is a need for affordable housing across the district.</p> <p><u>Green infrastructure:</u> Policy SP10 (Green Infrastructure) of the LPR requires all development proposals to:</p> <ul style="list-style-type: none"> <li>• protect or enhance existing Green Infrastructure (GI) and the functions this performs,</li> <li>• create additional GI which is integrated into the overall development design from the outset,</li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<ul style="list-style-type: none"> <li>take opportunities to achieve multi-functionality by bringing GI functions together.</li> </ul>
Terry McCarthy (lpr1910)	<p>I wish to <b>object</b> to this proposed policy. The addition of this site as a housing site is contrary to existing and emerging Council policies, will impact significantly locally, and does not preserve the previous planning history for the site. I will set out my concerns in turn below:</p> <p><b>Landscape - contrary to Policy Area Delivery Plan Policy 5, CS19 and emerging policy SP2</b></p> <p>The site is currently outside of the curtilage of Great Shefford village and within the Area of Outstanding Natural Beauty (AONB). It should be noted that the ground slopes from the existing development at Spring Meadows so is approximately 2m above the level of existing housing at the eastern end and then bunded at the western/north western end where a public right of way (PROW) runs on top of the bund. The development will be seen from a number of local PROW and from the A338, and as a result of the different levels will make a development here look out of place with the flow of the village, and contribute to the ribbon development along the A338 reducing the value of the AONB. It will also result in loss of view for the local primary school. For example, looking at the village from the PROW to Trindledown Copse, the roof level of a new development here would be significantly higher than the existing village.</p> <p>The AONB is a dark sky area. Historical residential development within Spring Meadows has resulted in an existing impact on this (it is one of the most lit parts of the village). New development with associated street lighting will add cumulatively to this impact. Local residents in the past have requested down time on the street lights in the village (eg between midnight -5am), but this was rejected by the Parish Council following public consultation. Provision of new LED lighting does not reduce the impact. The provision of lighting on higher ground in a new development would be detrimental to the local landscape.</p>	<p><u>Landscape impact</u></p> <p>A Landscape Sensitivity Assessment (2011) indicated that development on the site would not cause significant harm to the landscape character, and subject to a number of mitigation measures development would be acceptable. It is a small site that is well contained by landform and housing, with hedges along the western and northern boundaries. Development could be accommodated and retain small scale pattern and not intrude into the wider AONB. The site lies on the lower valley side, mostly below 115m AOD, with just the north corner rising slightly above.</p> <p>The policy will include the mitigation measures set out in the LSA and will also include a requirement for a Landscape and Visual Impact Assessment:</p> <p>i. <u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li><u>Retention of the existing boundary vegetation;</u></li> <li><u>Buildings to be kept off the northern-most corner of the site; and</u></li> <li><u>New planting to integrate buildings into the landscape and soften the edge.</u></li> </ul> <p>k. <u>The development design and layout will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA);</u></p> <p><u>Flood impact:</u></p> <p>The existing Local Plan did not include any allocations in Great Shefford. This was because there has been significant flooding in the village when the Housing Site</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Flood Impact – contrary to Policy CS 16 and emerging policy SP6</b></p> <p>(1) Great Shefford has been subject to a number of flooding events in the last 20 years, including flooding from the Great Shefford Stream that runs along the A338. The winter 2014 flood event resulted in closure of the A338 for a period, flooding of private dwellings, disruption to the village, loss of power and failure of the sewage system from ground water and flooding ingress. Allowing new development in this location will exacerbate existing issues here, which have yet to be resolved. Further a proposed plan for alleviation of the flooding with a new pipe diverting excess flow on the Great Shefford stream at times of flood is being delayed, with no firm agreement between all partners, or date of delivery yet provided. The previous Housing delivery plan in the Local Plan rejected this site on this basis and despite efforts of the Great Shefford Flood Alleviation Association and Parish Council, this situation has not changed since that decision.</p> <p>The impact on flooding is especially so for sewage, where by residents in Spring Meadows and the wider village have in the past been asked to reduce the use of private waste water services from dwellings in order to reduce the impact on those further down the system in the village where sewage is surcharging into properties and open spaces. A new development here would add to this impact.</p> <p>(2) In addition to flooding along the Great Shefford Stream, there is also potential for flash flooding, as occurred in 2007. This resulted in surface water run off flooding from high ground to parts of the village – a number of houses in the village were flooded as a result. Allowing a new development in this location will increase such flood risk potential onto existing adjacent properties, this is a concern given the higher level of the existing ground, its green field nature and potential for directional run off from a new road system connecting to the end of Spring Meadows. A development here would increase this flood risk locally.</p>	<p>Allocations Development Plan Document was being prepared. Since then, there are proposals for a flood mitigation scheme within Great Shefford.</p> <p>As part of the preparation of the Local Plan Review (LPR), Level 1 and Level 2 Strategic Flood Risk Assessments (SFRA) have been prepared which consider the site. Sites within Great Shefford were not specifically considered within the SFRA prepared for the Core Strategy or HSA DPD.</p> <p>The site itself lies within Flood Zone 1 whereby there is a low risk of flooding. The boundary of the site at its northern corner is at low risk of flooding from a surface water flow path during a 1 in 1000 year rainfall event. Development would need to be avoided on this part of the site, and the allocation for the site will require this.</p> <p>Groundwater emergence modelling identifies that the north eastern corner of the site is predicted to be affected by groundwater emergence during a 1 in 30 year and 1 in 100 year event. Development would need to be avoided on this part of the site, and the allocation for the site will require this.</p> <p>The site allocation for the policy will require a Flood Risk Assessment as part of any planning application.</p> <p>In relation to flooding, the policy will read as follows:</p> <p><u>g. The scheme will be informed by a Flood Risk Assessment for the site. This is due to the presence of a surface water flow path flows across the northeast corner of the site, in addition to a small area of</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>(3) Thames water provided my property with sand bags due to flooding from the groundwater run off since we have been resident. A concreted adjacent development is likely to increase the risk and frequency of subsequent events in the future</p> <p><b>Biodiversity Impact – contrary to policy CS17 of the Local Plan and emerging policy SP11</b></p> <p>(1) The sewage system in the village is not able to cope with the existing load during periods of high rainfall and particularly high groundwater. Over the last 10 years alone there has been events that has resulted in raw sewage leaving the system and entering surface water systems in the village. This then means that the sewage will enter the River Lambourn which is an internationally rare chalk stream habitat protected under national legislation as a Site of special Scientific Interest (SSSI), and as a Special Area of Conservation (SAC). Under the Habitat Regulations 2017 (as amended) all plans and projects should be subject to an appropriate assessment of their impacts where there is a likely significant effect alone or in-combination with other plans or projects. Given that there is an existing impact on the River Lambourn SAC from sewage pollution events, the cumulative impact of additional residential development on the local sewage system will lead to increased cumulative impact. It should be noted that, through the Lambourn Valley Flood Forum, Thames Water, have spent much time and effort seeking mitigation measures to reduce and avoid impacts as described above in the village. This has not to date been successful and the problem persists, and Thames Water have acknowledged they will not be able to separate the sewage system fully from ground water infiltration.</p> <p>(2) It is noted that the site had some thorn scrub adjacent to the school boundary removed around a decade ago, that provided habitat for farmland birds including Red Listed Birds of Conservation Concern. I have noted Yellowhammer, Linnet, Grey Partridge using the site. The protected reptiles,</p>	<p><u>groundwater emergence in the north east corner of the site. Development will need to be avoided in this area;</u></p> <p><u>Biodiversity impact:</u> The site was promoted through the ‘call for sites’ for the Council’s Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts.</p> <p>Natural England commented that there was the potential for development to have an adverse impact upon a Site of Special Scientific Interest, and that development may have an adverse impact on the integrity of a Special Area of Conservation through discharge, abstraction, construction, run-off/drainage.</p> <p>BBOWT commented that the site is within 1km of a Special Area of Conservation and development may not be appropriate. Habitat Regulation Assessment may be required. They also commented that the site is within 1km of a Site of Special Scientific Interest, development may not be appropriate</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Slow Worm and Grass Snake have been noted locally and may use habitats within the field edges.</p> <p><b>Sustainability – contrary to emerging policy SP5</b></p> <p>The site is not sustainable. There are very few options for public transport in the village, and these are in decline. At present only a small bus service route runs in the village. Any development would therefore be tied to car use, which is against existing and emerging policy on sustainability.</p> <p><b>Impact on Existing Dwellings – Contrary to emerging Policy DC 30</b></p> <ul style="list-style-type: none"> <li>As already stated the land subject to the proposed policy is significantly higher than the existing development within Spring Meadows. Development will result in significant impact on existing dwellings as a result. Overlooking properties having sight lines into existing property gardens with significant impact on mental health of existing residents if they feel they cannot venture out into their own properties without being visible to other property residents.</li> </ul> <p>(2) In order to supply pavement to this development there would require land take from existing front gardens and drives on either or both sides of the existing cul-de-sac at Spring Meadows. This will be resisted by local residents.</p> <p><b>Parking – contrary to emerging policy DC36</b></p> <p>The existing development on Spring Meadows did not provide sufficient off road parking for all dwellings, this is the case in the cul-de-sac section adjacent to the proposed policy site. There are bottlenecks and reduced access through necessary on street parking. Allowing development here and associated reduction in driveways of existing dwellings to create a pavement will exacerbate this issue, reducing the driveway lengths further below the standard in the emerging policy for the existing dwellings adjacent to the</p>	<p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirements will be as follows:</p> <p>g. <u>The scheme will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;</u></p> <p>i. <u>The site lies within the hydrological catchment of the River Lambourn SSSI/SAC and the development must demonstrate nutrient neutrality. A Habitats Regulations Assessment will be required to accompany any future planning application. This will be supported by an appropriate Nutrient Neutrality Assessment and Mitigation Assessment. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged;</u></p> <p><b>Sustainability:</b> Policy SP1 of the LPR sets out the spatial strategy for the district. The overall approach to development will be based on three spatial areas, one of which includes the North Wessex Downs AONB. The focus of development in each spatial area will follow the district-wide settlement hierarchy set out in Policy SP3.</p> <p>Within the settlement hierarchy, Great Shefford is identified as a ‘Service Village’. Service Villages are smaller rural settlements which offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>site. Spring Meadows in all practical terms is now a single track road and over the last few years there have been a number of occasions when the Veolia Refuse collection vehicles have become stuck or unable to pass. This also presents significant risk to emergency vehicles not being able to gain necessary access.</p> <p><b>Affordable Housing – contrary to Area Delivery Plan Policy 5</b></p> <p>The last survey carried out by the Parish Council found no additional need in the village for affordable housing. New development recently permitted within the village curtilage has provided additional new dwellings locally.</p> <p><b>Site History – Contrary to Green Infrastructure Policy and Settlement Boundary principles</b></p> <p>When the Spring Meadows development was granted permission in 1999 the land under the current proposed policy was given to the village as recreation space (to be used as a Football club as long as there was need). As soon as the club folded the changing facility was built on by the landowner precluding any future use for football. Despite this, locals used the field for informal recreation until the owner fenced this out. Objections were made at the time. Allowing development here will take away from the village the benefits of planning gain from a historical development and should be resisted. This development would appear to be the latest in a series of events leading to profits for developers and landowners to the detriment of both the village in terms of loss of recreational space and existing residents who moved here on the basis of legal restrictions on the use of adjacent land. The only people who appear to be benefitting are those who have benefited from restricting the use of the land from what was intended. We accessed a number of relevant boundary documents when the idea of a development was raised pre 2008 and when we moved to Spring Meadows in 1997 and will be reviewing them again with our solicitor in the near future.</p>	<p><u>Impact on existing dwellings:</u> The Local Highway Authority has advised that A footway would need to be provided from the development to the existing footway fronting 31. This is possible within the public highway.</p> <p><u>Parking:</u> Development proposals will need to comply with Emerging Draft LPR Policy DM36 (Parking).</p> <p><u>Affordable Housing:</u> The West Berkshire Housing Needs Assessment Update (July 2022) identifies that there is a need for affordable housing across the district.</p> <p><u>Green infrastructure:</u> Policy SP10 (Green Infrastructure) of the LPR requires all development proposals to:</p> <ul style="list-style-type: none"> <li>• protect or enhance existing Green Infrastructure (GI) and the functions this performs,</li> <li>• create additional GI which is integrated into the overall development design from the outset,</li> <li>• take opportunities to achieve multi-functionality by bringing GI functions together.</li> </ul>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
Councillor Tony Vickers (lpr986)	Support for allocation.	Support for allocation noted.
<b>Landowners, site promoters and developers</b>		
None		



**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA 29 Land off Charlotte Close, Hermitage (Site Ref: HSA 24)****(Proposed Submission LPR Policy: RSA 20 Land off Charlotte Close, Hermitage)**

Number of responses received: 9

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal consultee</b>		
Highways (lpr136)	<p>The policy is supported.</p> <ul style="list-style-type: none"> <li>This site is at the southern end of a large village that is gradually gaining additional amenities (e.g. village hall recently redeveloped, CoOp due to be built soon) and affords easy access via Priors Court Road to M4 Junction 13. It is located close to the existing Hermitage Green residential development.</li> </ul> <p>If development is to take place on this site, then I would request that close consideration be given to:</p> <ul style="list-style-type: none"> <li>Enhancement of bus service 6, to make the bus a more-frequent and more-attractive alternative for travel between Hermitage and Newbury town/Newbury Station;</li> <li>Continued investment to complete a high-quality, uninterrupted cycle- / pedestrian / equestrian route connecting Hermitage with Newbury, segregated from the B4009 and ideally using the former railway alignment south of Hermitage wherever possible, to encourage active travel and leisure use. The existing section of route between Hampstead Norreys and Hermitage shows what can be done and it is hoped that this can be expanded upon;</li> <li>In terms of heritage, ensuring that the former Hermitage Station which lies to the south-east of this site is preserved and kept free of development in its immediate environs.</li> </ul>	<p>Comments noted.</p> <p>Local Plan policies will seek to protect and improve local facilities and services. These comments will inform the emerging draft Infrastructure Delivery Plan.</p>

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Hermitage Parish Council (lpr1816)	It is too late to object to these policies because both sites are already in the planning process. A decision is awaited on RSA 29, land off Charlotte Close Hermitage and RSA 30 land to south east of Old Farmhouse, although superseded is being appealed.	<p>Comments noted.</p> <p>Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. This site has planning permission. As development has not yet been built out, the allocation is being retained.</p>
Environment Agency (lpr1675)	An ordinary watercourse is in culvert beneath this site. Therefore any development is an opportunity to open up the culvert which could contribute to biodiversity net gain. There should also be a minimum 5m wide undeveloped buffer zone to the watercourse whether it is de-culverted or not. This is because any new buildings closer than 5m could undermine the culvert and would also preclude the opportunity to de-culvert in the future.	<p>Comments noted.</p> <p>The policy will be amended to reflect these comments as follows -  'A Flood Risk Assessment (FRA) will be required as the site falls within an area at risk from surface water flooding with a small part of the site within a Critical Drainage Area. The FRA should consider all potential sources of flood risk and advise on the necessary SuDS techniques/mitigation measures to be incorporated within the scheme. <u>An ordinary watercourse is in culvert beneath the site. The development scheme should include opportunities to open up the culvert and contribute to biodiversity net gain. The development scheme should incorporate a 5m wide undeveloped buffer zone to the watercourse.</u>'</p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan</p>
Historic England (lpr1582)	Much of this site overlaps an area identified from aerial photography as ridge and furrow. We recommend a desk based assessment and, subject to the results of the desk based assessment, field evaluation. Ideally, this should take place prior to allocation, in order to confirm allocation of this site is appropriate and to avoid over- or under- allocating the site.	<p>Comments noted.</p> <p>The policy will be amended to reflect these comments as follows –</p>

Respondent (with lpr ref)	Response	Council Response
		<u>'The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary.'</u>
Natural England (lpr1603)	There is potential for development at these sites [RSA29 and RSA30], which would improve the connection between the core of the village and the Hermitage Green development. The allocations could accommodate two parcels of development with integrated open spaces, green infrastructure and woodland which would better integrate with the existing landscape character.	Comments noted.  The policy will be amended to reflect these comments as follows – <u>'green infrastructure that integrates the site within the existing landscape character'</u>
Thames Water (lpr1760)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.	Comments noted.  A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows - <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u>
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1883)	The Hermitage to Hampstead Norreys off-road path (the Eling Way) opened in 2020 for all non-motorised users for utility and recreational purposes along the disused Didcot to Newbury railway line, and has been a huge success. There are proposals to extend it northwards to Compton and southwards to	Comments noted.  The policy will be amended to reflect these comments as follows –

Respondent (with lpr ref)	Response	Council Response
	<p>Newbury – see policy DC 35. However, southwards much of the disused railway line no longer exists on the ground and a route through Hermitage has yet to be identified. MWBLAF suggests that wording is included in the policy so that a route might be obtained close when development is taking place at this site and site HSA 25 in policy RSA 30.</p> <p>The Forum recommends that a reference is added to the potential Hermitage to Newbury off-road path in the point on provision of pedestrian and cycle linkages through the site:</p> <p>(ii) The site will be accessed via Charlotte Close with the provision of pedestrian and cycle linkages through the site to HSA 25 (Land to the south east of the Old Farmhouse. <b>Consideration will be given to making these linkages part of a Hermitage to Newbury off-road path (cycle path) – see policy DC 35.</b></p>	<p><u>‘Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local Primary School to enable sustainable travel.’</u></p>
<b>Other stakeholders</b>		
British Horse Society (lpr855)	<p>The Hermitage to Hampstead Norreys off-road path (the Eling Way), opened in 2020 for all non-motorised users including horses for utility and recreational purposes along the disused Didcot to Newbury railway line, has been a huge success. There are proposals to extend it northwards to Compton and southwards to Newbury. It is vital that the extensions northwards and southwards are open to horses and link with the minor road network and public rights if way so that the village of Hermitage does not become a no-go area for equestrians to that horses have to use the increasingly busy B4009 through the village. This is a practical way of supporting the horse industry in policy DC34.</p> <p>(ii) The site will be accessed via Charlotte Close with the provision of pedestrian and cycle linkages through the site to HSA 25 (Land to the south east of the Old Farmhouse. <b>Consideration will be given to making these linkages part of a Hermitage to Newbury off-road path which is open to all non-motorised users including horses.</b></p>	<p>Comments noted.</p> <p>The policy will be amended to reflect these comments as follows –</p> <p><u>‘Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local Primary School to enable sustainable travel.’</u></p>
Councillor Tony Vickers (lpr991)	<p>The policy is supported.</p> <p>Other nearby sites (HER4/1) look very deliverable and should be included in this allocation.</p>	<p>Comments noted.</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	Include HER4&1 and allocate for 105 dwellings.	Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. This site has planning permission. As development has not yet been built out, the allocation is being retained.

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA30 Land to the south east of the Old Farmhouse, Hermitage (Site Ref: HSA 25)****(Proposed Submission LPR Policy: RSA21 Land to the south east of the Old Farmhouse, Hermitage)**

Number of responses received: 9

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Hermitage Parish Council (lpr1817)	It is too late to object to these policies because both sites are already in the planning process. A decision is awaited on RSA 29, land off Charlotte Close Hermitage and RSA 30 land to south east of Old Farmhouse, although superseded is being appealed.	Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. This site has planning permission. As development has not yet been built out, the allocation is being retained.
Environment Agency (lpr1676)	An ordinary watercourse is in culvert beneath this site. Therefore any development is an opportunity to open up the culvert which could contribute to biodiversity net gain. There should also be a minimum 5m wide undeveloped buffer zone to the watercourse whether it is de-culverted or not. This is because any new buildings closer than 5m could undermine the culvert and would also preclude the opportunity to de-culvert in the future.	Comments noted. The policy will be amended to reflect these comments as follows -  'A Flood Risk Assessment (FRA) will be required as the site falls within an area at risk from surface water flooding with a small part of the site within a Critical Drainage Area. The FRA should consider all potential sources of flood risk and advise on the necessary SuDS techniques/mitigation measures to be incorporated within the scheme. <u>An ordinary watercourse is in culvert beneath the site. The development scheme should include opportunities to open up the culvert and contribute to biodiversity net gain. The</u>

Respondent (with lpr ref)	Response	Council Response
		<p><u>development scheme should incorporate a 5m wide undeveloped buffer zone to the watercourse.'</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan</p>
Historic England (lpr1583)	We support the requirement for an archaeological desk based assessment as a minimum and field evaluation if necessary to assess the historic environment potential of the site, in accordance with NPPF paragraph 189.	Comments noted.
Natural England (lpr1602)	There is potential for development at these sites [RSA29 and RSA30], which would improve the connection between the core of the village and the Hermitage Green development. The allocations could accommodate two parcels of development with integrated open spaces, green infrastructure and woodland which would better integrate with the existing landscape character.	<p>Comments noted.</p> <p>The policy will be amended to reflect these comments as follows –  <u>'.....green infrastructure that integrates the site within the existing landscape character'</u></p>
Thames Water (lpr1768)	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, combined with adjacent developments in the local area Thames Water may have concerns if all developments were to go</p>	<p>Comments noted.</p> <p>A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows -  <u>'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.'</u></p>

Respondent (with lpr ref)	Response	Council Response
	ahead. Thames Water would welcome early consultation with details of the proposed build programme and drainage strategy.	
<b>General consultation bodies</b>		
Mid and West Berkshire Local Access Forum (lpr1884)	<p>The Hermitage to Hampstead Norreys off-road path (the Eling Way) opened in 2020 for all non-motorised users for utility and recreational purposes along the disused Didcot to Newbury railway line, and has been a huge success. There are proposals to extend it northwards to Compton and southwards to Newbury – see policy DC 35. However, southwards much of the disused railway line no longer exists on the ground and a route through Hermitage has yet to be identified. MWBLAF suggests that wording is included in the policy so that a route might be obtained close when development is taking place at this site and site HSA 24 in policy RSA 29.</p> <p>The Forum recommends that a reference is added to the potential Hermitage to Newbury off-road path in the point on provision of pedestrian and cycle linkages through the site:</p> <p>(iv) The site will be accessed via Lipscombe Close with the provision of pedestrian and cycle linkages through the site to HSA 24 (Land off Charlotte Close). <u>Consideration will be given to making these linkages part of a Hermitage to Newbury off-road path (cycle path) – see policy DC 35.</u></p>	<p>Comments noted.</p> <p>The policy will be amended to reflect these comments as follows –</p> <p><u>‘Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local Primary School to enable sustainable travel.’</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>Other stakeholders</b>		
British Horse Society (lpr940)	<p>The Hermitage to Hampstead Norreys off-road path (the Eling Way), opened in 2020 for all non-motorised users including horses for utility and recreational purposes along the disused Didcot to Newbury railway line, has been a huge success. There are proposals to extend it northwards to Compton and southwards to Newbury. It is vital that the extensions northwards and southwards are open to horses and link with the minor road network and public rights if way so that the village of Hermitage does not become a no-go area for equestrians to that horses have to use the increasingly busy B4009 through the village. This is a practical way of supporting the horse industry in policy DC34.</p> <p>(ii) The site will be accessed via Charlotte Close with the provision of pedestrian and cycle linkages through the site to HSA 25 (Land to the south</p>	<p>Comments noted.</p> <p>The policy will be amended to reflect these comments as follows –</p> <p><u>‘Opportunities should be taken to enable making these linkages part of a Hermitage to Newbury off-road path and to providing footpath links to the local Primary School to enable sustainable travel.’</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>



Respondent (with lpr ref)	Response	Council Response
	east of the Old Farmhouse. Consideration will be given to making these linkages part of a Hermitage to Newbury off-road path which is open to all non-motorised users including horses.	
Councillor Tony Vickers (lpr992)	The policy is supported.	Support noted
<b>Landowners,</b>		
Pro Vision on behalf of T A Fisher & Sons Ltd (lpr1935)	<p>The policy is supported.</p> <p>Policy RSA30 of the draft Local Plan allocates land owned by our client to the south east of the Old Farmhouse, Hermitage, for approximately 10 dwellings. This carries forward the allocation of the site for development from the adopted Housing Site Allocations Development Plan Document (DPD) (May 2017), as set out in Policy HSA25.</p> <p>The site's recent planning history is summarised below.</p> <p>Outline planning permission was granted on 20 November 2018 (ref. 17/03290/OUTMAJ) for the following development:  <i>“Outline application for demolition of farmyard buildings, retention of The Old Farmhouse and the erection of up to 21 new dwellings, improved vehicular access off Newbury Road, car parking, public open space and landscaping. Matters to be considered – Access”</i></p> <p>On 15 July 2020, the Council refused an application under Section 73 of the Town and Country Planning Act 1990 (as amended) “to vary Condition 4 (approved plans) of previously approved application 17/03290/OUTMAJ to amend the parameter plan”. An appeal against this decision was subsequently lodged and is yet to be determined.</p> <p>Paragraph 9.3 of the Council's Site Selection Background Paper (December 2020) explains that <i>‘The promoters of all the sites allocated in the Core Strategy and HSA DPD were contacted in the summer of 2020 for an update on deliverability so that it could be determined whether sites should be rolled forward into the LPR or not’</i>.</p> <p>Table 9.1 of the Council's Site Selection Background Paper (December 2020) provides the Council's deliverability update. In relation to land owned by our client (ref: HSA25), it is noted that:</p> <ul style="list-style-type: none"> <li>• <i>‘Site has planning permission</i></li> </ul>	<p>Comments noted.</p> <p>The outline planning consent (17/03290/OUTMAJ) relates to a larger site, of which the site allocated under RSA29 is only a part. It is this larger site which has been granted permission for up to 21 dwellings.</p> <p>In order to introduce some flexibility with regards to access, the policy will be amended as follows -</p> <p><u>‘The site will be accessed via Newbury Road and/or Lipscombe Close with the provision of pedestrian and cycle linkages from Lipscombe Close through the site to the allocations at RSA20 (Land off Charlotte Close) and RSA22 (land adjacent Station Road). with the provision of pedestrian and cycle linkages through the site to HSA 24 (Land off Charlotte Close).</u></p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• S.73 application recently refused – appeal lodged. New full application to be submitted later in 2020</li> <li>• Site owned by a developer</li> <li>• Anticipated build out rates: 2021/22:21 dwellings</li> <li>• Allocation will be rolled forward into the LPR’.</li> </ul> <p>The only comments that we have in relation to the Council’s deliverability update is to confirm that a new full application has not been submitted. Regarding Policy RSA30 of the draft Local Plan, our only comments relate to ensuring that its wording reflects the details of the site / development for which Outline planning permission was granted (ref. 17/03290/OUTMAJ). This relates to the following: Outline Planning Permission has been granted for up to 21 dwellings, with an approved developable area of approximately 0.98 hectares, as opposed to the 0.6 hectares quoted. We therefore respectfully request the following amendment: <i>“The site, as shown on the indicative map, has a developable area of approximately <del>0.6 hectares</del> 0.98 hectares”</i> The Outline application granted planning permission for up to 21 dwellings. The illustrative layout confirms that this level of development can be accommodated on the site as opposed to 10 dwellings as cited in the policy. We therefore respectfully request the following amendment: <i>“(i) The provision of approximately <del>10 dwellings</del> 21 dwellings to be developed at a mass and density that reflects the adjacent settlement character.”</i> Policy HSA25 states that the site will be accessed via Lipscombe Close. However Outline Planning Permission has been granted allowing access from Newbury Road. We therefore respectfully request the following amendment: <i>“The site will be accessed via Newbury Road, with the provision of pedestrian and cycle linkages from Lipscombe Close through the site to HER001 (Land off Charlotte Close). Access can also be provided off Station Road if the site is developed in conjunction with HER001 or via Lipscombe Close.”</i> <b>Conclusion</b></p>	

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>These representations have been prepared by Pro Vision on behalf of our client T A Fisher &amp; Sons Ltd in response to West Berkshire Council's consultation on its Local Plan Review 2020- 2037: Emerging Draft (December 2020).</p> <p>Our client owns land in the District that has been allocated for development in the draft Local Plan. This relates to Land to the south east of the Old Farmhouse, Hermitage, which is proposed for allocation in Policy RSA30 for approximately 10 dwellings. This carries forward the allocation of the site for development from the adopted Housing Site Allocations Development Plan Document (DPD) (May 2017), as set out in Policy HSA25.</p> <p>Our client supports the proposed allocation of the site and is keen to continue working collaboratively with the Council to secure its sustainable development. These representations therefore focus on responding to / clarifying specific elements in the wording of Policy RSA30 to ensure that it is clear and factually accurate.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Policy ref: RSA31 Land adjoining The Haven, Kintbury (Site Ref: KIN6)

Number of responses received: 20

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Kintbury Parish Council (lpr1725)	<p>Kintbury Parish Council acknowledges that there is in West Berkshire a need/requirement for more housing and, in particular, Affordable and Social Housing. In this respect, Kintbury has to play its part, on a limited basis, in accordance with the Plan.</p> <p>Kintbury Parish Council does raise the following concerns: Kintbury residents are very concerned about the increasing traffic through the Village centre and, particularly, the effect on the Conservation Area where the streets are of C18th origin or earlier, are extremely narrow with many streets without footways or ones that are inadequate. There are a number of pinch-points which result in congestion and create pollution where homes are close to the highway. In addition the growth of traffic already traversing the Village has resulted in long queues trying to cross the railway creating more congestion and pollution in the centre together with a difficult access to the A4, where most of the traffic is headed. Any development will have a deleterious effect on the level of traffic needing to pass through the centre of the Village.</p> <p>The proposed site (KIN 6) at The Haven is located outside of the Village Settlement Boundary and is in the AONB where the scenic quality is high and is a valued landscape. The site is surrounded by open fields and the Recreation Ground forming a part of the surrounding countryside and landscape. There is concern that the development could cause harm to the landscape quality and the value of the AONB. The site will be visible from highways and public rights of way. Access to KIN 6, via The Haven, could worsen the environment for residents of The Haven and the resulting removal of the garage site could create more on street parking unless it is replaced as part of the development. If the development is included in the Local Plan Review thought should be given to improving the environment within The Haven including providing additional parking and other facilities to take account of the environmental damage caused by the development.</p>	<p>Comments noted.</p> <p><u>Traffic:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern.</p> <p>Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:</p> <p><u>'A Transport Statement will be required as part of any planning application.'</u></p> <p><u>AONB:</u>  A Landscape Sensitivity Assessment (LSA) was prepared in 2011. The LSA advised that development on the site would be acceptable, subject to certain recommendations. The recommendations from the LSA will be incorporated into the policy as follows:</p> <p>(a) <u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>(i) <u>Replacement of the conifer hedge to the western boundary with more appropriate planting;</u></li> <li>(ii) <u>Views from the surrounding countryside, Public Right of Way, and the neighbouring recreational</u></li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<p><i>field would need to be carefully considered; and</i></p> <p>(iii) <i>New planting to integrate the buildings into the landscape.'</i></p> <p>In addition, the policy will also include the following requirement for a Landscape and Visual Impact Assessment:  <u>The development design and layout will be in accordance with policy SP7 and further informed by a full detailed LVIA.</u></p> <p>As part of the assessment of the site for the HELAA, the AONB Unit commented that there is the potential for development and that a landscape assessment would be required.</p> <p><u>Access:</u>  The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available. The policy for the site will include the following criteria as follows:  <u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated.</u></p> <p><u>A Transport Statement will be required as part of any planning application.</u></p>

Respondent (with lpr ref)	Response	Council Response
Thames Water (lpr1769)	<p>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</p> <p><u>Water response:</u> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><u>Waste response:</u> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><u>Additional comments:</u> Thames Water have no concerns relating to wastewater capacity based upon the assumption that the connection is via gravity and that no surface water shall be discharged to the Thames Water foul sewer network.</p>	<p>Comments noted. A Phase 1 and Phase 2 Water Cycle Study have since been prepared and will be reflected in the policy as follows - <u>An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Development will be occupied in line with this strategy.</u></p> <p>These comments will inform the emerging draft Infrastructure Delivery Plan.</p>
<b>General consultation bodies</b>		
BBOWT (lpr1004)	<p>The policy is not supported.</p> <p>The land adjoining the Haven is within 200m of a BBOWT reserve (Kintbury Newt Ponds) which supports protected species, including great crested newt and reptiles.</p> <p>The site appears to comprise habitats that may be suitable for these species and therefore a detailed site assessment will be required to determine the level of mitigation required. As well as the potential loss of suitable habitat, the development of this site could result in habitat fragmentation and isolation and BBOWT would like to see this addressed in the policy wording.</p>	<p>Comments noted.</p> <p>The site selection work undertaken for the draft emerging LPR recognised that Catmore and Winterly Copses SSSI and land at Inkpen Road Local Wildlife Site (LWS) lie within a 500m radius surrounding the site. It also identified that the LWS is also a BBOWT</p>

Respondent (with lpr ref)	Response	Council Response
		<p>nature reserve (Kintbury Newt Ponds) which hosts a large breeding population of Great Crested Newts. There are also European protected species and priority species within 500m of the site. The site selection background paper therefore recommended that up to date ecological surveys would be needed to establish current site conditions and the presence of any protected species at the site. An additional Great Crested Newt survey would also be required.</p> <p>The policy will include the following requirement for the following surveys as follows:  <u>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</u></p>
CPRE Berkshire (lpr1699)	<p>The proposed development of 20 dwellings at The Haven raises considerable concerns relating to the additional traffic through the main centre, which at peak times is excessive for a small rural village, and also has to accommodate through traffic entering from Inkpen, as their main exit route to join the A4. The road network is not robust enough to take additional traffic and the heavy goods lorries associated with a new development and subsequent deliveries, which will also inevitably impact on the air quality.</p> <p>The proposed site is not designated as an 'exception site' and will remove the central recreation area used by residents – it will not enhance and conserve the AONB and have significant impact on the 'openness' of the landscape.</p>	<p><u>Traffic:</u>  The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.  The site was assessed as 'potentially developable' in the HELAA, and it was then</p>



Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:</p> <p><u><i>A Transport Statement will be required as part of any planning application.</i></u></p> <p><u>Exception site:</u> Rural exception sites are defined in the glossary of the National Planning Policy Framework as: <i>“Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community</i></p>

Respondent (with lpr ref)	Response	Council Response
		<p><i>by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding."</i></p> <p>The Local Plan Review does not designate land as rural exception sites, it does however include a policy (DM16) which sets out parameters for when rural exception housing schemes will be permitted.</p> <p><u>Recreation:</u> The site is not currently accessible to the public.</p> <p><u>AONB:</u> A Landscape Sensitivity Assessment (LSA) was prepared in 2011. The LSA advised that development on the site would be acceptable, subject to certain recommendations. The recommendations from the LSA will be incorporated into the policy as follows:</p> <p><u><i>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</i></u></p> <ul style="list-style-type: none"> <li>(i) <u><i>Replacement of the conifer hedge to the western boundary with more appropriate planting;</i></u></li> <li>(ii) <u><i>Views from the surrounding countryside, Public Right of Way.</i></u></li> </ul>

Respondent (with lpr ref)	Response	Council Response
		<p><i>and the neighbouring recreational field would need to be carefully considered; and</i></p> <p>(iii) <i>New planting to integrate the buildings into the landscape.</i></p> <p>In addition, the policy will also include the following requirement for a Landscape Visual Impact Assessment as follows:  <u>The development design and layout will be, in accordance with policy SP7 and further informed by a full detailed Landscape and Visual Impact Assessment.</u></p> <p>As part of the assessment of the site for the HELAA, the AONB Unit commented that there is the potential for development and that a landscape assessment would be required.</p>
<p>North Wessex Downs AONB Unit (lpr1621)</p>	<p>The policy is supported.</p> <p>The AONB raised no objections with the inclusion of this site in the Housing allocations DPD, however it was not allocated at the time as it was undeliverable. We see no reason to alter our opinion, the site is well contained and provides an opportunity for landscape enhancement by replacing the belt of conifer trees to the western boundary.</p>	<p>Support for policy noted.</p> <p>The policy will include recommendations from the 2011 Landscape Sensitivity Assessment, one of which is the replacement of the conifer hedge. The requirement in the policy will read as follows:  <u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <p>(i) <u>Replacement of the conifer hedge to the western boundary with more appropriate planting;</u></p> <p>(ii) <u>Views from the surrounding countryside, Public Right of Way, and the neighbouring recreational</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><i>field would need to be carefully considered; and</i> (iii) <i>New planting to integrate the buildings into the landscape.'</i></p>
<b>Other stakeholders</b>		
Christine Britnell (lpr2207)	<p><i>Personal information removed</i></p> <p>There are reasons for me being against this.</p> <ol style="list-style-type: none"> <li>1. Parking is already an issue on The haven and it can be tight getting a car down let alone ambulance etc.</li> <li>2. The road is unsuitable for the amount of construction lorries and vehicles this would bring to the site</li> <li>3. We have quite a few children along the road and it will make it unsafe for them with the increase in traffic.</li> <li>4. The garages that are being knocked down help provide extra parking as well being to have the garages for storage as the houses are small and have no storage as well as tiny back gardens for other storage solutions.</li> <li>5. Parking is already an issue when there is football on as cars are doubled park on the road and the increased volume of traffic is unsafe to let our children out.</li> <li>6. The amount of wildlife that can be seen in the field is amazing and my children enjoy seeing it but again animals are losing a safe environment to building sites.</li> </ol> <p>So I am opposing against this planning application as the Haven is not an appropriate site as stated above and the safety of my children along with them not going to be able to play safely outside the front of there home due to increased traffic.</p>	<p><u>Parking:</u> It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows: <u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</u></p> <p><u>Construction lorries:</u> The matter of construction traffic would be dealt with at the planning application stage and would be dealt with through planning conditions.</p> <p><u>Safety / traffic:</u> The Highways Authority provided comments on the site as part of work on the HELAA and site assessment work. No concerns were raised around safety.</p> <p><u>Wildlife:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a</p>

Respondent (with lpr ref)	Response	Council Response
		<p>preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:  <u>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</u></p>

Respondent (with lpr ref)	Response	Council Response
<p>Chrissy Hearn (lpr1999)</p>	<p><i>Some personal details have been removed from representation. Image enclosed with representation - see attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>)</i></p> <p>I am writing to object strongly about the houses being built behind The Haven. There are numerous reasons as to why I feel this is not a suitable site for any dwellings.</p> <p>The road in The Haven is narrow and children are used to playing in the road in safety. There are issues now with increased cars per family and therefore cars are often parked on both sides of the roads making it difficult for larger vehicles such as ambulances, fire engines, delivery vans and bin lorries. This is increased when the football club has matches or is used for other functions as people tend to park along The Haven sometimes making it difficult to get access to garages or park outside or near houses. The pressure is even greater now that residents from The Crescent park at the back of their houses even though they have room at the front. Some have dropped curbs to their gardens or built garages in their back gardens. Then their visitors park outside their gardens in The Haven. All very frustrating as it wasn't like this when we moved here.</p> <p>The access road to the proposed new houses would mean loss of garages which have been rented for many years. Due to the very small gardens residents really need the use of the garage. We own a car and two motorcycles they won't fit in the road now so would add to the problem.</p> <p>The area behind is a green belt area and is home to many types of wildlife. I often see three different types of deer (that come right up to the fence). There are slow worms, smooth snakes, hedgehogs, field mice, toads and birds of prey. I even hear foxes calling. Also many types of birds too including Owls, Kites and Woodpeckers to name a few, among the many small birds that come to the garden bird feeder.</p> <p>I object to the plans. The noise and mess would be horrendous. At present there is often rubbish piled at the front of the flats. The open space behind houses is very important to me. It has been space with clean air for me to breathe.</p> <p>I have seen many houses built since living here. People struggle to park around the village especially at the doctors surgery who have to cope with so many more people.</p>	<p><u>Narrow road / safety:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available. No concerns were raised around safety or the width of the road.</p> <p><u>Loss of garages:</u> It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows: <i><u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be re-provided.</u></i></p> <p><u>Wildlife / greenbelt:</u> There is no greenbelt in West Berkshire. The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites. As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the</p>

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	<p>How lucky I saw the information about the planning of building houses behind the Haven or I wouldn't of known about it. There must be many more residents who haven't seen or know of the proposed plans for behind The Haven. I feel this information should of been posted to us so we could of responded.</p>	<p>Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><u><i>An EcIA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</i></u></p> <p><u>Noise / mess:</u> The Council's Environmental Health Team were consulted on the site as part of the preparation of the HELAA.</p> <p>There is a medium risk of noise and vibration problems to future occupants from the sports facilities to the north. A noise survey will be required as part of a planning application, and</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>the site allocation policy will specify that such a study is required. The wording of the requirement will be as follows:  <u><i>A noise survey will be required as part of planning application due to the proximity of the site to a sports ground.</i></u></p> <p>Development is unlikely to result in adverse impact/worsening of air quality. There is possible particulate matter from construction and operational impacts. The level of impact on minimising emissions depends on the location of development within the site, building materials / construction, transport / design.</p> <p><u>Infrastructure / services:</u>  Existing pressure on some local services and facilities is recognised. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.  Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result</p>



Respondent (with lpr ref)	Response	Council Response
		<p>of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure (such as GP services) could be sought through CIL</p> <p><u>Information on the consultation:</u> The consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>
Kelly Hearn-Smith (lpr1637)	<p>The policy is not supported.</p> <ol style="list-style-type: none"> <li>1. This area is the natural habitat of many species of birds, reptiles and amphibians, including some which are rare. Building here would therefore cause damage to the habitat and cause death to these organisms.</li> <li>2. The Haven is overcrowded with cars as it is. Cars are often parked on both sides of the road as well as in the garages where access is proposed. Therefore additional through traffic would very likely result accidents and injury and it is unlikely that access would be viable to refuse collection vehicles and emergency services.</li> <li>3. The garages where the access is proposed have been on long-term rental to residents, with many investing time and money to their upkeep and organisation. This seems unfair that some elder people will be forced to get rid of their belongings such as gardening equipment, bicycles etc as there simply isn't room on their properties. Others park their cars in the garage which will again further increase the parking problem.</li> <li>4. Residents in the housing of The Haven currently benefit from not being overlooked as their neighbours in The Crescent have long gardens in addition to the two paths and road separating them. Some residents have lived here since they were build and would feel threatened were buildings build closer than this behind.</li> </ol>	<p><u>Wildlife:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites. As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT). The assessment by TVERC highlighted there was a medium risk of adverse impacts.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>5. There is insufficient infrastructure and amenities to cope with further buildings and an increased population in the village. Of particular concern are healthcare provision (doctors surgery), education/school places at primary and nursery, youth activities, sports facilities available (for free or subsidised).</p> <p>6. Insufficient local road network for an increase in cars - Newbury Street, Station Road, Inkpen Road and the High Street are frequently backed up due to traffic. Further Road users would exacerbate this problem.</p>	<p>Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:  <u><i>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</i></u></p> <p><u>Parking / road safety:</u>                      The Highways Authority provided comments on the site as part of work on the HELAA and site assessment work. No concerns were raised around safety. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available.</p> <p><u>Garages:</u></p>

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		<p>It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows:  <u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</u></p> <p><u>Overlooking:</u>  National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Infrastructure / services:</u>  Existing pressure on some local services and facilities is recognised. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.  Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of</p>

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		<p>additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure (such as GP services) could be sought through CIL.</p> <p>The Council's Education Team have advised that in terms of primary education, the scale of development would be absorbed into the catchment population. For secondary education, the impact of development can be accommodated within the existing infrastructure (John O Gaunt School).</p> <p><u>Local road network:</u></p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential</p>

Respondent (with lpr ref)	Response	Council Response
		<p>for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows: <u>'A Transport Statement will be required as part of any planning application.'</u></p>
Terri Hearn (lpr2011)	<p>I am writing to register my objections to the proposed plans for housing behind The Haven, Kintbury.</p> <p>My objections are as follows:</p> <ol style="list-style-type: none"> <li>1. This area is the natural habitat of many species of birds, reptiles and amphibians, including some which are rare. Building here would therefore cause damage to the habitat and cause death to these organisms. I really enjoy all the wildlife in this field.</li> <li>2. The Haven is overcrowded with cars as it is. Cars are often parked on both sides of the road as well as in the garages where access is proposed. Therefore additional through traffic would very likely result accidents and injury and it is unlikely that access would be viable to refuse collection vehicles and emergency services. As another pub in kintbury has closed and as life returns to normal following the pandemic the football club will become a hub for social activity again which causes issues in the road.</li> <li>3. The garages where the access is proposed have been on long-term rental to residents, with many investing time and money to their upkeep and organisation. This seems unfair that some</li> </ol>	<p><u>Wildlife:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites. As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire,</p>

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	<p>elder people will be forced to get rid of their belongings such as gardening equipment, bicycles etc as there simply isn't room on their properties. Others park their cars in the garage which will again further increase the parking problem.</p> <p>4. Residents in the housing of The Haven currently benefit from not being overlooked as their neighbours in The Crescent have long gardens in addition to the two paths and road separating them. Some residents have lived here since they were build and would feel threatened were buildings build closer than this behind.</p> <p>5. There is insufficient infrastructure and amenities to cope with further buildings and an increased population in the village. Of particular concern are healthcare provision (doctors surgery), education/school places at primary and nursery, youth activities, sports facilities available (for free or subsidised).</p> <p>6. Insufficient local road network for an increase in cars - Newbury Street, Station Road, Inkpen Road and the High Street are frequently backed up due to traffic. More housing on to this road would cause further problems</p>	<p>Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:  <u>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</u></p> <p><u>Safety / traffic:</u>  The Highways Authority provided comments on the site as part of work on the HELAA and site assessment work. No concerns were raised around safety.</p> <p><u>Garages:</u>  It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any</p>

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		<p>parking that is lost. The requirement will be worded as follows:  <u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</u></p> <p><u>Overlooking:</u>                      National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Infrastructure:</u>                      Existing pressure on some local services and facilities is recognised. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.                      Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result</p>

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		<p>of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure (such as GP services) could be sought through CIL.</p> <p>The Council's Education Team have advised that in terms of primary education, the scale of development would be absorbed into the catchment population. For secondary education, the impact of development can be accommodated within the existing infrastructure (John O Gaunt School).</p> <p><u>Local road network:</u></p> <p>The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street,</p>



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		<p>Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows: <u><i>A Transport Statement will be required as part of any planning application.</i></u></p>
Tim Hearn (lpr1998)	<p><i>Some personal details removed from representation</i></p> <p>I am writing to strongly object houses being build behind The Haven for numerous reasons. I feel this site is not a viable site for any dwellings. The plans show that the site would be accessed via where the current garages are. The Haven is a very narrow road. There is already parking on both sides of the pavements, making it difficult for those in wheelchairs and with prams and pushchairs to walk along at many times. I am concerned about the dwellings increasing accessibility issues and the safety of residents if this became an access road for other dwellings. Many people that live in The Crescent park at the back of their houses (in the Haven), which restricts parking for residents that live in the Haven. They have entrances to garages and drop-down curves to the back of their houses which reduces parking further. When parking is an issue already, I am concerned how being an access route would add to this. Children daily ride their bikes, scooters and play ball games in the road opposite the flats and play ball games in the garages. I am concerned of the number of wing mirrors and accidents that will happen as a result of additional traffic. Due to the closeness to Kintbury football club those that do not live here park on the streets and grassy areas for quick access to the fooball club. In non pandemic times the street, pavements</p>	<p><u>Narrow road / safety:</u> The Highways Authority provided comments on the site as part of work on the HELAA and site assessment work. No concerns were raised around safety or the width of The Haven.</p> <p><u>Loss of garages:</u> It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows: <u><i>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</i></u></p>

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	<p>and grass areas of The Haven are regularly parked on for football training, matches, social events at Kintbury Football club open many evenings. People fill the garages and the road both sides all the way down to the end to attend the football club. I know you might say they can park at the football club, but they choose not to as they would have to walk further to the club from the parking area.</p> <p>The access road would also mean garages, which are vital as gardens are so small, would be knocked down. Residents with garages would have nowhere to store bikes, motorbikes, garage gym equipment and cars. This would have a detrimental effect on quality of life not being able to continue with healthy leisure pursuits when the government are trying to get people fit and healthy. The flats and houses were designed for 1 car households, which does not fit well with modern day families so the road is full of cars on both sides of the road.</p> <p>I feel that the area is an area of outstanding natural beauty and a conservation area and therefore should not be built on. Residents enjoy a significant amount of wildlife on a daily basis. At the moment lucky enough to have three types of deer, hedgehogs, field mice, foxes, toads, slow worms, smooth snakes and birds of prey (by night and day) as well as lots of different species. In the proposed site I am most concerned about the toads and smooth snakes which are rare and protected. I do not feel that their habitat should be destroyed. They have always been in the Kintbury area since I was a boy. It is therefore vital you consider the local ecology in regard to any planned building work. Support can be provided by The Wildlife Trust.</p> <p>I object the plans as I feel there would be more issues of noise pollution as the houses were built with small gardens, which were just acceptable to buyers, due to the fact that there were fields for miles behind the houses so long gardens were not needed. I am concerned that there would be so much noise being surrounded by houses. I feel that longer gardens would be needed to stop noise pollution and fields in between. In The Haven the very small gardens have always looked onto open fields. Residents have therefore always had privacy and do not want to be overlooked or feel claustrophobic, or in the shadow of nearby buildings. I feel that an open space is much needed for quite enjoyment and quality of life.</p> <p>Some Sovereign Housing Association properties are tired looking flats, sometime built up rubbish outside the flats. I am concerned that more houses in a very small area backing on to small gardens would make this issue worse.</p> <p>The current village infrastructure does not support any more dwellings being built in any shape or form. The surgery is extremely busy as it is, and not always easy to get an appointment and the car park is always full and hard for people to find a space. This makes the entrance of the surgery dangerous and more dwellings would create more traffic with more households needing to use it</p>	<p><b>AONB:</b> A Landscape Sensitivity Assessment (LSA) was prepared in 2011. The LSA advised that development on the site would be acceptable, subject to certain recommendations. The recommendations from the LSA will be incorporated into the policy:</p> <p><u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>(i) <u>Replacement of the conifer hedge to the western boundary with more appropriate planting;</u></li> <li>(ii) <u>Views from the surrounding countryside, Public Right of Way, and the neighbouring recreational field would need to be carefully considered; and</u></li> <li>(iii) <u>New planting to integrate the buildings into the landscape.'</u></li> </ul> <p>In addition, the policy will also include the following requirement for a Landscape Visual Impact Assessment: <u>The development design and layout will be, in line with policy SP7, further informed by a full detailed Landscape and Visual Impact Assessment.</u></p> <p>As part of the assessment of the site for the HELAA, the AONB Unit commented that there is the potential for development and that a landscape assessment would be required.</p>

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	<p>and make the surrounding streets and car park more dangerous. Increasing the households in the village would decrease the quality of life for others, and reduce the quality of current services. I object to the creeping urbanisation of the village which would ruin the sense of peace and rural area and erode the historic settlement where my family have lived for generations and open landscape beyond the once small village. I wonder what next will we be part of Hungerford? I am concerned about the significant harm to the area of natural beauty and the wider local landscape and valuable green infrastructure. I feel that there are not enough doctors, large roads, school places, nurseries, leisure facilities to support more households and dislike the continuous reduction in valuable green areas in the village that have occurred over time.</p> <p>I am concerned for all the villagers who like to come to the football field and walk around the local fields with their dogs and get lots of quiet enjoyment and relaxation from the nature, wild plants, wildlife and animals, especially at the time in a pandemic where rural walks are all we have to do. I am concerned that all over West Berkshire houses keep being built with little or no thought to the infrastructure provided for local people, whilst developers make money and move on to destroy the next village or town, reducing the quality of life for local people. There is already a large and increasing amount of traffic through the village and building more houses would increase the traffic issues in the area and I feel the transport impacts would be severe.</p> <p>I am concerned about the impact on quality of life as I take great pleasure in the wildlife. Please see attached picture of a deer. I am concerned about the noise, road traffic, rare animals, plants, trees, damaging effects on wild life plants and animals, and the devaluation of property.</p> <p>I have seen houses built on the land in front and behind The Blue Ball pub in Kintbury. These were both on allotment land. After this building took place on the allotments and the old coal yard but no locals appeared to benefit. Then land on Miss Lawrence's field (to which there was a lot of opposition).</p> <p>I feel strongly that you must do more to make all residents of The Haven and The Crescent and Football Club aware of proposals. Many people in the street are elderly and do not have access to the internet, from speaking to a few passers-by nobody that lives in the road is aware at all about the plans which I think is atrocious. I think you need a door step approach to consultation on these matters.</p>	<p><u>Wildlife:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows: <u>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>habitats and/or species will not be adversely affected.</u></p> <p><u>Noise pollution:</u> The Council's Environmental Health Team were consulted on the site as part of the preparation of the HELAA. There is a medium risk of noise and vibration problems to future occupants from the sports facilities to the north. A noise survey will be required as part of a planning application, and the site allocation policy will specify that such a study is required. The wording of the requirement will be as follows: <u>A noise survey will be required as part of planning application due to the proximity of the site to a sports ground.</u></p> <p><u>Overlooking:</u> National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Rubbish outside existing properties:</u> This is a matter outside the scope of planning.</p> <p><u>Infrastructure:</u> Existing pressure on some local services and facilities is recognised. An interim Infrastructure Delivery Plan (IDP) has been</p>

Respondent (with lpr ref)	Response	Council Response
		<p>produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure (such as GP services) could be sought through CIL.</p> <p><u>Urbanisation:</u> Policy SP1 of the LPR sets out the spatial strategy for the district. The overall approach to development will be based on three spatial areas, one of which includes the North Wessex Downs AONB. The focus of development in each spatial area will follow the district-wide settlement hierarchy set out in policy SP3.</p> <p>Within the settlement hierarchy, Kintbury is identified as a 'Service Village'. Service Villages are smaller rural settlements which</p>

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		<p>offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs.</p> <p><u>Impact on quality of life:</u> A key thread throughout the National Planning Policy Framework (NPPF) is to secure a good standard of amenity so that quality of life is not impacted, for example at paragraphs 92, 130, 185, and 189. Policy SP7 (Design Quality) of the LPR requires that all development must strengthen a sense of place through high quality locally distinctive design and place shaping. It must enable healthy place making, making places better for people, taking opportunities for conserving and enhancing the character, appearance, and quality of an area and the way it functions. The Council's Quality Design Supplementary Planning Document provides guidance on the impacts of development on neighbouring living conditions.</p> <p><u>Notification of the consultation:</u> The consultation was widely publicised, in accordance with the council's Statement of Community Involvement (SCI), on the Council's website and in the local press and via notification emails to those registered on the Council's consultation database.</p>
Nikki Hutchins (lpr682)	I am against the development of the land behind the haven, kintbury because : ( <i>personal information removed</i> ) and the number of cars has increased immensely.	<p><u>Traffic:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The road is narrow because of all the cars and It is already difficult and sometimes impossible for emergency vehicles to go along it.</p> <p>The haven is a cul-de-sac and numerous children live here and it would be incredibly dangerous with lorries and construction vehicles going up and down.</p> <p>If access was through where the garages are now that would be even more dangerous and would increase the number of cars parked in the road.</p> <p>It would affect the wildlife in the area behind the haven which is home to badgers, rabbits, deer and many birds of all sizes.</p> <p>The haven is also home to elderly persons, bungalows-a hazard for these residents also.</p> <p>It would also increase the number of people at the doctors surgery which is already at capacity.</p> <p>The residents in the flats have no parking spaces so have to park in the street, their are also cars going in and out of the garages own the rear gardens of houses in the crescent.</p> <p>There are already numerous lorries going up and down the Inkpen road which causes chaos in the narrow village streets especially exiting Inkpen road at the square.</p> <p>Preferred Approach: For the Land to be left how it is.</p>	<p>Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>The site was assessed as ‘potentially developable’ in the HELAA, and it was then subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available.</p> <p><u>Safety:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available. No concerns were raised around safety.</p> <p><u>Wildlife:</u> The site was promoted through the ‘call for sites’ for the Council’s Housing and Economic</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><i><u>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</u></i></p>



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		<p><u>Infrastructure / services:</u> Existing pressure on some local services and facilities is recognised. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.</p> <p>Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure (such as GP services) could be sought through CIL.</p> <p><u>Parking:</u> It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows:</p>

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		<p><u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</u></p> <p><u>Local highway network:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows: <u>A Transport Statement will be required as part of any planning application.</u></p>
James Lipscombe (lpr2085)	<p><i>Representation has been summarised to remove personal details</i></p> <p>Representation expresses concern that garages would be knocked down if scheme goes ahead and raises issue of compensation.</p>	<p><u>Garages:</u> It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows:</p>

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		<u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</u>
John Maher (lpr2205)	<p>Please lodge our objection to any proposed development on this greenfield site behind the Haven Kintbury.</p> <p>My reasons are as follows</p> <ul style="list-style-type: none"> <li>• Traffic down the haven would be increased. <ul style="list-style-type: none"> <li>○ The intersection into Inkpen Road from the Haven is a dangerous one, due to limited visibility up Inkpen road (I have had a couple of near misses there myself).</li> <li>○ Increased pressure on the intersection with station road, which can get congested easily.</li> <li>○ Heavy duty trucks in the village, especially down the haven road would be downright dangerous.</li> <li>○ Parking in the haven is already very scarce, this would add to the problem</li> </ul> </li> <li>• Extra pressure on the village's existing social resources. <ul style="list-style-type: none"> <li>○ It is already impossible to get Doctors' appointments (outside of covid restrictions) let alone adding in more families.</li> </ul> </li> <li>• The village has already had very recent developments, in Leylands Green, and Mrs Lawerences fields.</li> </ul> <p>We believe the village has already had its fair share.</p>	<p>Comments noted.</p> <p><u>Traffic:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p> <p>The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work.</p> <p>The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:  <u><i>A Transport Statement will be required as part of any planning application.</i></u></p> <p><u>Parking:</u>                      It is not proposed that any parking will be lost, nonetheless the policy for the site will include a requirement for the re-provision of any parking that is lost. The requirement will be worded as follows:  <u><i>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be reprovided.</i></u></p> <p><u>Services:</u>                      Existing pressure on some local services and facilities is recognised. An interim Infrastructure Delivery Plan (IDP) has been produced that considers all the infrastructure that will be required to support the development required through the LPR (including the scale of development allocated to each of the spatial areas). The IDP will be updated in partnership with service providers once the sites have been confirmed and any necessary infrastructure improvements will be taken forward.                      Service providers are aware of the potential sites for future development and discussions are taking place as to the provision of additional services/facilities to serve the new</p>

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		<p>population. New facilities/services as a result of development would also benefit the existing community.</p> <p>New residential development is subject to the Community Infrastructure Levy (CIL). Financial contributions towards mitigating the impact of increased population on infrastructure (such as GP services) could be sought through CIL.</p> <p><u>Additional development:</u> Policy SP1 of the LPR sets out the spatial strategy for the district. The overall approach to development will be based on three spatial areas, one of which includes the North Wessex Downs AONB. The focus of development in each spatial area will follow the district-wide settlement hierarchy set out in policy SP3.</p> <p>Within the settlement hierarchy, Kintbury is identified as a 'Service Village'. Service Villages are smaller rural settlements which offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs.</p>
Jen Truby (lpr450)	<p>I specifically disagree with the site allocated for residential development in Kintbury, LPR policy RSA31.</p> <p>1) This land supports a variety of wildlife including (but not limited to) deer, foxes, toads, owls and bats. Destruction of this greenfield site in order to build houses would be significantly detrimental to the local environment and the AONB.</p> <p>2) Local access. The closest road to this site is The Haven. The Haven is a cul-de-sac on which there is no off street parking for residents, and barely enough on street parking to accommodate the cars already there. Most days it is not possible to have traffic moving in two directions due to all the parked cars. Adding additional traffic, both during construction and afterwards, does not</p>	<p><u>Wildlife:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p>

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	<p>seem safe. In addition, connecting the site to The Haven will likely reduce the amount of parking available to local residents, exacerbating this problem further.</p> <p>3) Further detriment to existing residents. The land is higher than the houses already present on The Haven, which are currently not overlooked by any other properties. Building on this land would likely result in a) loss of light and b) loss of privacy, to those existing houses.</p> <p>4) General access in Kintbury. The roads in Kintbury are extremely narrow, and contain many parked cars due to lack of off street parking in this old village. Pavements, are also extremely narrow or entirely absent in parts of the village. Various road junctions, including the Inkpen Road/High Street junction - which new residents would likely use daily - have very poor lines of sight and frequently cause traffic issues. Adding additional users to these roads doesn't seem safe or reasonable. This point is an objection against any site in Kintbury, not just this one.</p> <p>5) Impact of existing in-progress development. Development is already happening at another site in Kintbury, with an expected increase in road usage. Adding more development before assessing the ultimate impact of that and cumulative impact with further development seems short-sighted. This is another objection against any further development in Kintbury.</p> <p>6) Impact on services. The Parish Council's assessment says that the GP and primary school are both at capacity, and have concerns about the ability of the water and sewerage systems to cope with additional development. Another objection against any further development in Kintbury. I don't believe that building on previously undeveloped sites in the AONB should be allowed at all. I think our natural environment should be our first priority, and any building that is required should be done on previously developed sites.</p> <p>If it must be done on a greenfield site to meet quotas, then I would suggest an alternative site should be found, ideally one that doesn't also have the other issues outlined above. Kintbury has many issues, and The Haven even more. I would suggest finding alternative sites elsewhere in the county, or at least elsewhere in Kintbury.</p> <p>If there are no other possible sites in Kintbury, then I would suggest that minimizing the impact on existing residents should be a priority. Both access and parking issues, and the detriment to current properties due to being overlooked and overshadowed by new houses are problems. Find alternative access to the site (other than The Haven) and providing a significant buffer of undeveloped land between existing houses and the new development would be a start.</p>	<p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><u>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</u></p> <p><u>Access:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the</p>

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		<p>existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available.</p> <p><u>Overlooking:</u> National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Access in Kintbury:</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites. The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work. The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street,</p>

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		<p>Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:  <u><i>A Transport Statement will be required as part of any planning application.</i></u></p>
Sue Truby (lpr481)	<p>My objection to any housing development in and around Kintbury, and especially in the area backing onto The Haven.  Kintbury is a beautiful, old, small village to the West of Newbury. The roads through it are narrow. Much of the original housing has no garages so cars have to be parked on those roads. It is unusual to be able to drive through any of its roads without having to effectively have one-way traffic because of parked cars. Further development would add more cars and add to congestion. Access to Kintbury itself from Newbury to the west through the countryside or along the A4 and then South through countryside, flood plain and over the canal and railway, is not suited to increased traffic. The roads are narrow and already have one-way sections over various bridges. These are not suitable for construction traffic either.  Kintbury is situated in a designated Area of Outstanding Natural Beauty. The surrounding fields and woods are home to many species of birds, bats, butterflies, insects, mammals. The Newt Pond is a delight. The canal is home to kingfishers, egrets, herons and many species of duck. Further development would be to the detriment of this wildlife and negatively affect the enjoyment of the residents in their area. This has been particularly important during the lockdowns and restrictions of 2020, and 2021, and the increased leisure use of the surrounding area is unlikely to reduce.</p>	<p>Comments noted.</p> <p><u>Narrow roads / construction traffic:</u>  The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.  The site was assessed as 'potentially developable' in the HELAA, and it was then subject to more detailed site assessment work.  The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential</p>



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	<p>The area behind The Haven is at a higher level than the housing in The Haven itself. Any development there would overlook the housing in The Haven and lead to loss of light and privacy as well as increased noise pollution. Access from The Haven itself would be problematic as again many of the houses have no garages so there has to be on-road parking, leading to congestion. This congestion would be particularly bad during construction.</p> <p>Areas of Outstanding Natural Beauty should be just that. Building on any AONB means that it will no longer be an AONB. Please therefore do not build in this AONB.</p> <p>If there are absolutely no other options other than to build on this AONB, then please do not build in/around Kintbury. As I've explained, Kintbury is totally unsuitable for further housing development. In particular the area behind The Haven is the worst possible option there.</p> <p>If you absolutely have no option but to build behind The Haven, then please leave a strip at least 100m wide of undeveloped (wild) land between any new development and the existing housing in The Haven. This would provide habitat for wildlife and also provide some barrier between the existing and new housing to mitigate the overlooking and loss of privacy.</p>	<p>for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:</p> <p><u><i>A Transport Statement will be required as part of any planning application.</i></u></p> <p>The matter of construction traffic would be dealt with at the planning application stage and would be dealt with through planning conditions.</p> <p><u><b>AONB:</b></u> A Landscape Sensitivity Assessment (LSA) was prepared in 2011. The LSA advised that development on the site would be acceptable, subject to certain recommendations. The recommendations from the LSA will be incorporated into the policy:</p>

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		<p><u>The scheme will be developed in accordance with the Landscape Sensitivity Assessment (2011):</u></p> <ul style="list-style-type: none"> <li>(i) <u>Replacement of the conifer hedge to the western boundary with more appropriate planting;</u></li> <li>(ii) <u>Views from the surrounding countryside, Public Right of Way, and the neighbouring recreational field would need to be carefully considered; and</u></li> <li>(iii) <u>New planting to integrate the buildings into the landscape.'</u></li> </ul> <p>In addition, the policy will also include the following requirement for a Landscape Visual Impact Assessment: <u><i>The development design and layout will be, in line with policy SP7, further informed by a full detailed Landscape and Visual Impact Assessment.</i></u></p> <p>As part of the assessment of the site for the HELAA, the AONB Unit commented that there is the potential for development and that a landscape assessment would be required.</p> <p><u>Wildlife</u> The site was promoted through the 'call for sites' for the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA forms part of the evidence base for the Local Plan Review (LPR) and it makes a preliminary assessment of the suitability and potential of sites.</p>

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		<p>As part of this work, a desktop assessment of the impact that development might have on nature conservation was undertaken by the Thames Valley Environmental Research Centre (TVERC). Comments were also sought from Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT).</p> <p>The assessment by TVERC highlighted there was a medium risk of adverse impacts. Natural England did not provide any comments, and BBOWT identified that there could be harm should mitigation measures not be implemented.</p> <p>The policy for the allocation will include a requirement for surveys, and the final developable area will be dependent upon the extent of any appropriate evidence and mitigation measures. The wording of the requirement will be as follows:</p> <p><u><i>An EclA [Ecological Impact Assessment] will be required which should include a Great Crested Newt survey. The final developable area will be dependent upon the extent of any appropriate avoidance and mitigation measures required to be implemented to ensure any designated sites and/or protected habitats and/or species will not be adversely affected.</i></u></p> <p><u>Loss of light and privacy:</u> National Planning Practice Guidance requires that planning policies and decisions do not undermine quality of life. Policy SP7 (Design Principles) of the LPR requires that</p>

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		<p>development will provide a high quality of amenity and privacy for both occupants of the development and neighbouring properties and land.</p> <p><u>Development in Kintbury:</u> Policy SP1 of the LPR sets out the spatial strategy for the district. The overall approach to development will be based on three spatial areas, one of which includes the North Wessex Downs AONB. The focus of development in each spatial area will follow the district-wide settlement hierarchy set out in policy SP3. Within the settlement hierarchy, Kintbury is identified as a 'Service Village'. Service Villages are smaller rural settlements which offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs.</p>
Ccouncillor Tony Vickers (lpr993)	The policy is supported.	Support for policy noted.
<b>Landowners, site promoters and developers</b>		
Bell Cornwell on behalf of Baylight Properties Plc (lpr2278)	<p>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</p> <p>The policy is not supported.</p> <p>Re site at Holt Road, Kintbury (KIN005).</p>	<p>Comments noted.</p> <p>The site (KIN5) was assessed as 'not developable within the next 15 years' in the HELAA that was published in December 2020. This was because development would result in significant harm to the natural beauty</p>

Respondent (with lpr ref)	Response	Council Response
	<p>On behalf of our client, Baylight Properties, we are writing in response to the current Regulation 18 consultation on the emerging West Berkshire Local Plan.</p> <p>Our client is the owner of a site at Holt Road in Kintbury. It was given the reference KIN005 by the Council (Land off Holt Road). The site is situated within the North Wessex Downs AONB and has been rejected by the Council from shortlisting for allocation in the Local Plan review on landscape grounds, meaning that it has not progressed to a more detailed assessment.</p> <p>However, this analysis has been based on a larger scale of development which has involved developing on the whole of the site. Whilst the site in our client's ownership remains the same, we are now promoting the site for 20 units, which is recognised by the Council as an appropriate level of development for a service village. We show the location plan at the end of this letter and confirm that the 20 uses would be provided adjacent to the residential area.</p> <p>We continue to include a significant area of public open space on the site, to provide a parkland for existing and new residents and to provide a soft landscaped edge to the AONB, an amenity area plus an opportunity to provide enhanced landscape and opportunities for biodiversity net gain.</p> <p>We have previously rebutted the Council's landscape conclusions and note that West Berkshire's landscape sensitivity work has been successfully challenged on other sites and is, in reality, a very top level assessment that does not constitute a Landscape and Visual Assessment (LVIA). Caution should therefore be applied when using this work to reject sites from allocation without a more detailed assessment. It is also relevant that Natural England did not object to a previous application for 40 dwellings on the site.</p> <p>Land north of Holt Road can make a useful contribution to meeting the continued needs of Kintbury without having a harmful impact on the character of the town, the AONB, the highway network or any other amenities.</p> <p>The Holt Road site is located adjacent to the settlement boundary of Kintbury, to the east of the village, and within the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB) (which covers 74% of West Berkshire). There is a housing estate (Pentlands) to the west of the site which forms a hard-built edge to the current settlement, with limited architectural merit. To the south of the site is Holt Road, which has additional areas of residential development off it. In terms of the site's location, it forms a logical small extension to Kintbury.</p> <p>We note that Kintbury continues to be designated as a Service Village in the spatial strategy of the emerging Local Plan, which is the same designation as within the Core Strategy. The spatial strategy seeks to direct development to the most sustainable locations in the District, the principle of additional residential development in Kintbury has therefore been accepted.</p>	<p>of the North Wessex Downs Area of Outstanding Natural Beauty (AONB).</p> <p>A 2014 Landscape Capacity Assessment had concluded that development on the site would result in significant harm to the natural beauty of the AONB. Development would be prominent in views from the wider landscape to the east and north and would impact on the countryside setting of the east side of the village.</p> <p>As part of the preparation of the HELAA, comments were sought from the AONB Unit. They advised that development would result in harm due to the open to views and vistas. They went on to advise that there was a strong rural character despite influence of settlement edge.</p> <p>Appeal decision (ref: APP/W0340/W/17/3183931) concluded that proposals would cause serious harm to the landscape quality and value of the AONB and that the harm to the valued landscape could not be overcome. The Inspector noted that '<i>although the site abuts the village, it does so at the very extremity of the built-up area...whilst the existing built development has mainly been confined to the plateau area, at the appeal site the land starts to slope away from the village, connecting it visually with the shallow valley to the east, and exposing it to views from this direction...the appeal site has only a weak relationship with the built up area. Rather, it appears as connected with, and as an integral part of, the surrounding countryside and landscape.</i>'</p>

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	<p>Kintbury plays an important role and function for the surrounding area which is an important consideration. The village will therefore require a continued amount of development in the future to ensure that local needs for both market and affordable housing can be met. We note that the Settlement boundary review topic paper which has informed the Local plan review, shows that Kintbury scores very highly in terms of its facilities and services and was almost at the next level of the hierarchy – rural service centre. That would have, in principle meant that the area was suitable for a higher quantity of development.</p> <p>However, only a very limited amount of development has been allocated to Kintbury through the emerging Local Plan Review. This has allocated just one site for 20 dwellings which is insufficient, particularly when set in the context of West Berkshire’s longer term housing needs. Additionally, In recent years, the amount of housing development that has taken place at Kintbury has been small. A sizeable development took place at Inglewood, which is within the Parish, but this is some way outside the village itself, and occupation is limited to over-55s. Only one small site was allocated in the Housing Site Allocations DPD, at Leyland Grove, and this alone is unlikely would not satisfy the needs arising from the existing community</p> <p>We are therefore promoting land at Holt Road for a housing site of approximately 20 units as either a replacement for land adjacent to the Haven or as an additional site for allocation to add flexibility into the Council’s housing supply. We note that the Council has previously accepted that a proposal for 32 units on the site would not constitute major development in the North Wessex Downs AONB which is a helpful precedent.</p> <p>In terms of landscape impact, we note the conclusion of the Landscape Sensitivity Assessment 2011. However, we rebut the conclusions of this, with reference to our own more detailed landscape information which has been submitted to the Council as part of planning application ref 17/03561/OUTMAJ. This is set out in full Landscape and Visual Impact Assessment which has been prepared by Lockhart Garatt. We are also submitting a smaller area of the site for development which should be assessed separately from the larger site.</p> <p>With regard to deliverability, the site is deliverable in terms of the definition in the NPPF; i.e. it is available now, offers a suitable location for development now and development is both achievable and viable. The site is in the control of a willing developer. The planning application that was previously prepared for the site was supported by the full range of technical studies to confirm that the site was deliverable. We have not submitted these alongside this promotion of the site as it has previously been submitted as part of the previous planning applications on the site. We can, however, make the technical work available if it would be useful.</p> <p>We are able to confirm that the site can come forward at an early opportunity and contribute to the housing needs of the District within the next five years.</p>	<p><u>Reduced dwelling number:</u> The site will be re-assessed within the update to the HELAA for a reduced number of dwellings (20). As part of the re-assessment of the site, views from the AONB Unit have been sought. They have advised that their previous comments remain, and a reduction does not alter the impact of development upon the AONB. Whilst the HELAA update is in progress, the comments from the AONB Unit mean that the site will continue to be “not developable within the next 15 years’.</p> <p>The AONB is a nationally significant landscape, and the NPPF is clear at paragraph 176 that “<i>great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues.</i>”</p>

Respondent (with lpr ref)	Response	Council Response
	<p>In terms of detail, our client is happy to work with the Council to ensure an appropriate development on site. The proposal would be policy compliant in terms of the delivery of affordable housing (we note that policy SP 19 seeks 40% affordable housing on greenfield sites) and would provide a mix to respond to local needs (we have had regard to table 3 of the emerging local plan which sets out information about the indicative housing size by number of bedrooms but note that this will vary depending on site specific circumstances).</p> <p>Additionally there is scope to provide an element of self-build or custom build products on the site to respond to demand for these in accordance with emerging policy DC17.</p> <p>Our client is committed to a high-quality development which would take a design –led approach to the scheme, with a particular focus on ensuring improvements to the existing position, especially with respect of the hard-urban edge of the Pentlands estate. Allocating the site would assist the Council in delivering sustainable development whilst meeting identified local needs. The low level of growth to Kintbury in recent years cannot possibly have been meeting local needs and we are aware that the housing waiting list remains lengthy in the area. The ability of the sites to address local housing pressure in a sustainable location weights strongly in favour of the allocation.</p>	
<p>Jackson Planning on behalf of Mrs Adcock and Mrs Hamer (lpr2088)</p>	<p>See attachment on the Local Plan Review Consultation Portal (<a href="https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/">https://consult.westberks.gov.uk/kse/event/35924/peoplesubmissions/section/</a>) for full response to the Local Plan Review.</p> <p>Mrs Adcock &amp; Mrs Hamer OBJECT to the allocation of site KIN6 as currently set out in the consultation draft of the plan and request modifications are made to the plan are made so that it is positively prepared and is consistent with National policy.</p> <p>Whilst generally my clients are supportive of the plan overall and support the allocation of appropriate development sites in the plan, they are keen to assist the Council in achieving a plan that meets all the test of soundness. The approach is to recommend where changes can be made to assist the Council to achieve a sound plan and achieve the proper planning of the area. The submissions are supported by a sketch alternative site to KIN6.</p> <p>The requested modifications to the current document are based on matters of detail and to assist the plan to be entirely consistent with national policy, and previously adopted local policies in order to create a high-quality development. This representation offers the opportunity to assist with delivery of an appropriate form of development.</p> <p><b>Tests of Soundness</b></p>	<p>Comments noted.</p> <p><u>SA/SEA consistency:</u> It is not proposed to amend the SA/SEA summary for KIN3. KIN6 is closer to a larger number of facilities and services than KIN3</p> <p><u>Problematic access:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that an acceptable access onto The Haven should be achievable via the existing garages. Any parking lost to the garages will need to be relocated. Sight lines at The Haven / Inkpen Road junction will need to be improved but a technical note provided in July 2015 has shown that land is available. Site KIN6 is being promoted by Sovereign Housing who also own the garages and most of the properties in The Haven. Sovereign</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>Whilst the plan is currently at an early consultation stage it will be considered at the formal Regulation 19 stage against the tests of soundness for a Local Plan, and it is important that early drafts of the plan consider these tests.</p> <p>The NPPF 35 sets out the tests of soundness. Whilst the plan is not at this formal stage it is important as the plan progresses that these tests are met.</p> <p><b>POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY</b></p> <p>The plan must be</p> <p>Positively Prepared – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p> <p>Justified- the plan must be the appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>Consistent with National Policy – enabling the delivery of sustainable development in accordance with policies in the Framework.</p> <p>The submissions consider the tests of soundness at this early stage.</p> <p>Policy RSA31 – Land adjoining the Haven, Kintbury (Site Ref: KIN6) Assessment</p> <p><b>Background</b></p> <p>The site KIN6, subject of this representation, does not represent the appropriate strategy when considered against the alternatives. This statement sets out why the development of my clients' site is a more appropriate strategy to achieve the local plans objectives.</p> <p>The sustainability assessment (SA) has assessed those sites in Kintbury deemed suitable for development in the HEELA. For my clients' site (KIN3) the overall assessment was as follows:  <i>Overall the site is likely to have a neutral effect on sustainability and the SA/SEA does not highlight any significant sustainability effects. When considered alongside the site allocated within the HSADPD, the site would have a good relationship with the existing settlement. Development on the site has the potential to improve the built environment through a well designed scheme. It is close to local facilities and services but the degree of car dependency is still likely to be high. Whilst acknowledging the existing situation regarding parking and traffic in Kintbury, the increase in traffic from development on this site is not a significant concern. The site is underlain with clay</i></p>	<p>have advised that the properties that front onto Inkpen Road are within their ownership. There is therefore the ability to bring back the hedgerows so that visibility splays can be put in place.</p> <p>It is not proposed for any garages to be lost, nonetheless the policy for the site will include the following criteria in respect of the loss of any garages:  <u>Access to the site will be provided from The Haven via the existing garages. Any parking lost will need to be relocated.</u></p> <p>At Reg 18, the new sites proposed for allocation did not have detailed site allocation policies / plans as the detail had not been worked up at that stage. This is why the access was not shown on the plan.</p> <p><u>Amenity:</u></p> <p>In respect of the flood lights at the sports ground to the north of the site, a line of trees separates the site from the sports ground. Environmental Health were consulted as part of the sites assessment for the HELAA and they raised no issues in respect of the flood lights.</p> <p>No garages are proposed to be lost, nonetheless the site allocation policy will include a criteria that requires the re-provision of any parking.</p> <p>SSE have advised that where overhead powerlines cross a site, these can generally remain in place with uses such as open</p>



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	<p><i>which would restrict the scope for SuDS. Appropriate mitigation measures would need to be put into place to reduce any potential negative impacts. As the site is close to a site with Great Crested Newts, there is also potential for a negative impact on environmental sustainability, unless appropriate avoidance and mitigation measures are implemented. (My emphasis).</i></p> <p>The summary for the assessment for the chosen site KIN6  <i>“Overall the site is likely to have a neutral effect on sustainability and the SA/SEA does not highlight any significant sustainability effects. The site has a strong relationship with the existing settlement and is close to local facilities and services. Development on the site has the potential to improve the built environment through a well designed scheme. The degree of car dependency is still likely to be high, but whilst acknowledging the existing situation regarding parking and traffic in Kintbury, the increase in traffic from development on this site is not a significant concern. “</i></p> <p>The assessments in summary are inconsistent. The actual scoring for KIN6 and my clients’ site KIN3 are identical. The negative comments on KIN3 would apply to KIN6 and equally the positive comments that have been made in relation to KIN6 could equally apply to KIN3. However, in reality the sustainability scoring for KIN3 is better than KIN6 as the policy has not considered the demolition of twelve garages as part of the proposal. This is not assessed as part of the SA. It is clear that access to the site requires the demolition of twelve garages. The KIN6 Haven site has the following technical issues:</p> <p><b>Problematic Access</b></p> <p>The access to the site KIN6 is compromised. The access is shown through an existing active garage court. The distance between the two garage frontages is just over eight metres. Given there is a need for a 6 metre reversing space for a vehicle in front of a garage space at minimum there is no opportunity to provide an access and protect the garages. Twelve private garages will need to be demolished to gain a workable access to the site. This is not a sustainable solution as the embedded carbon in the garage buildings will be lost through demolition, and this creates demolition waste. The SA in 8b) is incorrect in relation to this item it states the following: “The site’s location is unlikely to have any positive or negative impact on the overall amount of waste produced, collected and or land filled”. The site will generate landfill from the demolition waste of twelve garages. This should result in a negative score on this metric in the SA.</p> <p>It is not clear if the owners of the garages have agreed to their demolition. Is this part of the site subject to ransom? Will this render the proposal unviable for affordable housing? Is the access</p>	<p>space, parking, garages or public highways generally being permitted in proximity to the overhead lines. There are no overhead powerlines that run across the site itself, they are instead within close proximity to the site. Likewise, the underground cables are in close proximity.</p> <p><u>Settlement form:</u>  A Landscape Capacity Assessment (2011) outlines that the site is different in nature to the countryside to the west and south, being flat and enclosed transitional landscape made up of rough grass with no visual link to the wider landscape. It goes on to state that whilst development would discontinue the linear nature of development, a deeper pattern of development is common elsewhere in Kintbury. The site has a strong relationship with the settlement, even though it is not within the settlement boundary.</p> <p><u>Site size and effective use of land:</u>  Within the settlement hierarchy (as set out in policy SP3), Kintbury is identified as a ‘Service Village’. Service Villages are smaller rural settlements which offer some limited and small-scale development potential appropriate to the character and function of the village in order to meet local needs. Site KIN6 lies at the edge of the settlement within the AONB. Policy SP1 (Spatial Strategy) of the LPR states that developments on the edge of defined settlements are</p>

Respondent (with lpr ref)	Response	Council Response
	<p>truly available and deliverable.? This critical access to the site is not currently shown on the allocation red line. This makes the site inaccessible, and undeliverable as currently shown.</p> <p><b>Amenity Issues</b> The proposal site is located adjacent to the Kintbury Rangers Football club. This is a lower league club. The football ground has flood lighting and a stand. The club hosts league matches that draw away teams and supporters. The impact of this existing established use has not been considered in the SA or the site assessment. The only reference to it is in relation to noise and vibration as follows: “There is a medium risk of noise and vibration problems to future occupants from the sports facilities to the north. A noise survey would be required as part of a planning application” The assessment has not considered the impact of floodlighting in relation to the amenity of future residents. The site assessment also noted “SSE has noted there is a network of existing HV overhead lines (OHLs) and underground cable in close proximity of the site.” The impact of this on future occupiers had not been considered. The additional on-street parking that will result from the loss of 12 garages and the subsequent loss of storage for the twelve garages has not been assessed.</p> <p><b>Settlement Form</b> The proposal to develop KIN 6 extends the village significantly westwards within the AONB area and extends into the undeveloped edge of the settlement. It will be understood in settlement form as a distinct westwards’ extension of the settlement. This takes Kintbury in a different direction as a village and expands it from the more compact form of the settlement.</p> <p><b>Site Size and Effective use of Land</b> It is inefficient to allocate the site for 20 dwellings when it is clear that at 1.3 hectares the site could accommodate over 40 dwellings. The NPPF section 11, especially paragraph 123 requires avoiding homes being built at low density is making sure that developments make optimal use of the potential of the site. As currently set out the site would be built out at a density of 15dwellings per hectare. This is not compliant with the NPPF. To be effective, and compliant with the national requirements in NPPF 123 this site would need to accommodate 40 dwellings. This amount of development would have an unacceptable impact on residents of the Haven. 40 dwellings would generate over 200 vehicle movements a day.</p> <p><b>Access</b></p>	<p>generally expected to secure a net density of 30 dwellings per hectare. However, lower density developments will be appropriate in certain areas of the District that are particularly sensitive to the impact of intensification and redevelopment. This may be because of the prevailing character of the area, the sensitive nature of the surrounding countryside or built form, and/or the relative remoteness from public transport. The site, and all of Kintbury, lies within the North Wessex Downs AONB. The AONB is a nationally significant landscape, and the primary purpose of its designation is to conserve and enhance the natural beauty of the area. The West Berkshire Density Pattern Book (2019) sets out that in edge of village / settlement locations within the AONB, density will be 20 dwellings per hectare.</p> <p><u>Access:</u> The Highways Authority provided comments as part of the HELAA and site assessment work. They advised that extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The site assessment identifies issues with access generally in Kintbury. “Extensive on street parking within the High Street limits potential for additional traffic flow. There are already problems with getting bus and other larger vehicles through High Street, Newbury Street, Holt Road and the northern end of Inkpen Road due to road width, parking, hedges and adjoining land uses. Double yellow lines in High Street, Newbury Street, Holt Road and the northern end of Inkpen Road could help mitigate the effects of additional development in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern”.</p> <p>Whist the limitations also apply to my clients’ site, there is a point of difference. With the Haven site the vast majority of the trips from the site must use the central crossroads of Inkpen Road and High Street. This is extremely congested, whereas, with our alternative site no vehicles need to use the crossroads to gain access to the station, the A4 or Newbury – the main destinations in the village.</p> <p><b>Advantages of KIN3</b></p> <p>In addition to the problems with KIN6 there are significant physical advantage to my clients’ site (KIN3) that show that it is appropriate site for development as it has none of the serious issues with the proposed site set out above.</p> <p>This site consolidates the village by rounding off the existing village structure rather than extending it west. It also has the significant opportunity to create a better approach to the village from the east. The current hard edge of the back of the houses.</p> <p>This site creates an opportunity to form an east/west pedestrian link at the south east of the village and create better internal walking connections generally to improve sustainability. The proposed site offers no such benefit.</p> <p>This site is not visible from footpaths, the Haven site is visible from footpath KINT15/1 and the recreation ground. The site KIN6 therefore has more receptors in terms of landscape impact.</p> <p>The extensive ownership of land adjacent to this site allows for more off-site planting and biodiversity mitigation with the developer’s control.</p> <p>The development of this site does not impact the amenity of existing residents in the village by the new traffic generated by the development to the same extent as the proposed site. Site KIN6 will impact significantly on all the existing residents of the Haven, They will be adversely affected during construction and when the site is occupied.</p> <p>The residents of KIN3 would not use the crossroads junction of the Inkpen Road and High Street to gain access to Newbury or the train station.</p>	<p>in the village. It is not considered that the increase in traffic at the Inkpen Road/High Street junction (in relation to the existing traffic using the junction) is of significant concern. Any future planning application will need to be accompanied by a Transport Statement, and the requirement for this will be included in the site specific policy for the site and worded as follows:</p> <p><u><i>A Transport Statement will be required as part of any planning application.</i></u></p> <p><b>KIN3:</b></p> <p>It is not proposed to allocate site KIN3, and KIN6 will remain as the proposed allocation in Kintbury. KIN6 is closer to a larger number of facilities and services than KIN3.</p> <p>In light of the particular features of Kintbury (ie. Service Village so only suitable for a limited amount of development, traffic related concerns), it is considered that the development of both KIN3 and KIN6 would be too great for the village.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><b>Draft Policy RSA31</b> My clients OBJECT the draft allocation policy RSA31 and site KIN6 for the following key reasons</p> <ul style="list-style-type: none"> <li>• When properly assessed the site scores worse in the Sustainability Appraisal than Site KIN3. The main reason being that it will generate construction waste from the demolition of the garages. This also wastes the embedded carbon required for the construction of the garages</li> <li>• The proposal will result in the wasteful loss of 12 well used private garages</li> <li>• The proposal will be impacted by noise and floodlighting from the Kintbury Rangers Football club. No proper account of the lighting impact is made in the site assessment</li> <li>• The site density proposed is inconsistent with national policy. The allocation should be closer to 40 dwellings to avoid wasteful low density development. This would generate over 200 vehicle movements per day for the development and would significantly adversely impact the existing residents of the Haven.</li> <li>• The proposed site offers no wider benefits in terms of biodiversity.</li> </ul> <p>Overall, if the policy is taken forward as currently proposed the problems with the proposed site KIN6 would fail the tests of soundness of the local plan. The choice of site is not justified by the evidence. The proposal is not an appropriate strategy and it is not consistent with National Policy.</p> <p>Suggested revised policy The Site KIN3 is allocated for 20 dwellings, access directly from Holt Road, pedestrian access to be provided to Layland's Green. Off-site planting will be provided to enhance biodiversity and provide strategic screening.</p> <p><i>The objectors have submitted a site plan showing a layout plan that reflects the draft alternative policy.</i></p>	
Onnalee Cubitt (lpr2192)	<p>The policy is supported.</p> <p>The landowners and Sovereign support Policy RSA 31 and the specific identification of the Land Adjoining The Haven, Kintbury (Site Ref: KIN6) as a residential development site. The landowners and Sovereign have entered into dialogue to bring forward the development site in accordance within the emerging Local Plan via The Haven. Whilst we support the identification of the site for development, we believe that the site is capable of accommodating a greater level of development than that identified. Indeed within the evidence base supporting the emerging Local Plan, the Landscape Character Assessment for Kintbury identifies that the site could be developed without harm to the boundary vegetation and that development of the site, subject to a</p>	<p>Support for allocation noted.</p> <p>Site KIN6 lies at the edge of the settlement within the AONB. Policy SP1 (Spatial Strategy) of the LPR states that developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings per hectare. However, lower density developments will be appropriate in certain areas of the District that are</p>

Respondent (with lpr ref)	Response	Council Response
	<p>number of recommendations, “could be accommodated without harm to the natural beauty of the AONB”. Moreover, we agree that as the LCA confirms, the “site has a strong relationship with the settlement”. As confirmed within the council’s own evidence base the site is well related to the settlement boundary and its development would not harm the wider AONB. The site is capable of providing much needed family accommodation within the village, providing both affordable and market housing and we look forward to working with the council to bring forward the site in line with agreed policy criteria.</p> <p>Therefore we would be keen to undertake active engagement with both the Council and Parish Council to assist with the understanding of the site constraints and any potential mitigation measures required. We would be keen to meet both Council's at the earliest opportunity to discuss the site and the timescales for delivery when the Council look to refine the detailed policies of the allocation.</p>	<p>particularly sensitive to the impact of intensification and redevelopment. This may be because of the prevailing character of the area, the sensitive nature of the surrounding countryside or built form, and/or the relative remoteness from public transport.</p> <p>The site, and all of Kintbury, lies within the North Wessex Downs AONB. The AONB is a nationally significant landscape, and the primary purpose of its designation is to conserve and enhance the natural beauty of the area.</p> <p>The West Berkshire Density Pattern Book (2019) sets out that in edge of village / settlement locations within the AONB, density will be 20 dwellings per hectare.</p>
Sovereign Housing Association Ltd (lpr2188)	<p>The policy is supported.</p> <p>The landowners and Sovereign support Policy RSA 31 and the specific identification of the Land Adjoining The Haven, Kintbury (Site Ref: KIN6) as a residential development site. The landowners and Sovereign have entered into dialogue to bring forward the development site in accordance within the emerging Local Plan via The Haven. Whilst we support the identification of the site for development, we believe that the site is capable of accommodating a greater level of development than that identified. Indeed within the evidence base supporting the emerging Local Plan, the Landscape Character Assessment for Kintbury identifies that the site could be developed without harm to the boundary vegetation and that development of the site, subject to a number of recommendations, “could be accommodated without harm to the natural beauty of the AONB”. Moreover, we agree that as the LCA confirms, the “site has a strong relationship with the settlement”. As confirmed within the council’s own evidence base the site is well related to the settlement boundary and its development would not harm the wider AONB. The site is capable of providing much needed family accommodation within the village, providing both affordable and market housing and we look forward to working with the council to bring forward the site in line with agreed policy criteria.</p>	<p>Support for allocation noted.</p> <p>Site KIN6 lies at the edge of the settlement within the AONB. Policy SP1 (Spatial Strategy) of the LPR states that developments on the edge of defined settlements are generally expected to secure a net density of 30 dwellings per hectare. However, lower density developments will be appropriate in certain areas of the District that are particularly sensitive to the impact of intensification and redevelopment. This may be because of the prevailing character of the area, the sensitive nature of the surrounding countryside or built form, and/or the relative remoteness from public transport.</p> <p>The site, and all of Kintbury, lies within the North Wessex Downs AONB. The AONB is a nationally significant landscape, and the</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	Therefore we would be keen to undertake active engagement with both the Council and Parish Council to assist with the understanding of the site constraints and any potential mitigation measures required. We would be keen to meet both Council's at the earliest opportunity to discuss the site and the timescales for delivery when the Council look to refine the detailed policies of the allocation.	primary purpose of its designation is to conserve and enhance the natural beauty of the area. The West Berkshire Density Pattern Book (2019) sets out that in edge of village / settlement locations within the AONB, density will be 20 dwellings per hectare.

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA32 New Stocks Farm, Paices Hill, Aldermaston****(Proposed Submission LPR Policy: RSA24 New Stocks Farm, Paices Hill, Aldermaston)**

Number of responses received: 5

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Aldermaston Parish Council (lpr1056)	APC remains of the view that there is insufficient space for 8 new (permanent) pitches at New Stocks Farm, Paices Hill.	Comments noted.  It is considered that there is sufficient space on site. The GTAA 2021 recommends further pitches on site.
Wokingham Borough Council (lpr1470)	(In presenting the whole LPR to Wokingham Borough Council's Individual Member Decision, the following is relevant). Policy RSA 32 proposes to allocate an additional 8 permanent pitches at the existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing HSA. This site appears to be located within the DEPZ of AWE Aldermaston as recently updated. The Site Selection Background Paper identifies that the pitches are in place but do not benefit from planning permission. It is unclear whether this additional accommodation would be compatible with the Off-Site Emergency Plan and whether planning permission would be forthcoming. The deliverability of this site would need to be clarified by WBDC's Emergency Planning team. Informal advice to WBC is that emergency planners would advise against	Comments noted.  In allocating the site through the Housing Site Allocations Development Plan Policy in 2017 this would have been considered and planned for in the Off-Site Emergency Plan. It is appreciated that caravans are a vulnerable shelter. However, the permanent pitches replace transit pitches where there are existing caravans. Permanent pitches also offers the opportunity for amenity buildings/day rooms which have the potential to provide a more robust shelter in the event of an emergency at the AWE. Planning permission has recently been granted for

Respondent (with lpr ref)	Response	Council Response
	<p>permitting caravans within the DEPZ. WBC would also request clarification on how the use of this land for permanent pitches rather than transit pitches would impact on the need for transit pitches within WBDC and wider.</p>	<p>the change of use of the land from 8 transit pitches to 8 permanent pitches.</p> <p>The GTAA identifies that 4 transit pitches are required in the plan period, and an option is to retain the Paices Hill site. The GTAA 2021 provides further options, and the Council will be exploring such options going forward.</p>
<p>Wokingham Borough Council (lpr1471)</p>	<p>Policy RSA 32 proposes to allocate an additional 8 permanent pitches at the existing private site at Paices Hill within an area of land currently comprising transit pitches. This allocation is carried forward from the existing HSA. This site appears to be located within the DEPZ of AWE Aldermaston as recently updated. The Site Selection Background Paper identifies that the pitches are in place but do not benefit from planning permission. It is unclear whether this additional accommodation would be compatible with the Off-Site Emergency Plan and whether planning permission would be forthcoming. The deliverability of this site would need to be clarified by WBDC's Emergency Planning team. Informal advice to WBC is that emergency planners would advise against permitting caravans within the DEPZ. WBC would also request clarification on how the use of this land for permanent pitches rather than transit pitches would impact on the need for transit pitches within WBDC and wider.</p> <p>The deliverability of this site would need to be clarified by WBDC's Emergency Planning team. WBC also request clarification on how the use of this land for permanent pitches rather than transit pitches would impact on the need for transit pitches within WBDC and wider.</p>	<p>As above (lpr1470).</p>
<p>Thames Water Utilities (lpr1761)</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p>	<p>Comments noted.</p> <p>The developer would be encouraged to liaise with Thames Water during the planning application process.</p> <p>The developer would need to plan for no sewer network serving the area.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>Whilst Thames Water have no concerns for this development, please be aware that there is no sewer network serving the area.</p>	
<b>General consultation bodies</b>		
NA		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr994)	Agrees with the proposed policy.	Support noted.
<b>Landowners, site promoters and developers</b>		
NA		

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: RSA33 Long Copse Farm, Enborne, Newbury****(Proposed Submission LPR Policy: RSA25 Long Copse Farm, Enborne, Newbury)**

Number of responses received: 5

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Environment Agency (lpr677)	<p>An ordinary watercourse flows along the western boundary of the site. Where the watercourse changes direction and flows from west to east this is through the development site so a minimum 5m wide buffer zone will be required.</p> <p>We support the statement “no caravans will be permitted within Flood Zones 2 and 3 at the northern edge of the site”. It should also be mentioned that a site-specific Flood Risk Assessment will be required to accompany any planning applications for this site.</p>	<p>Comments noted.</p> <p>In response to the buffer to the watercourse, a further criterion will be added as follows -  <u>‘(xi) A minimum 5 metre buffer zone will be provided and maintained between the watercourse running through the site and any proposed plots.’</u></p> <p>Policy DC20 of the LPR Proposed Submission sets out a detailed list of assessments required for travelling showpersons sites, including a Flood Risk Assessment and sustainable urban drainage systems.</p>
Thames Water Utilities (lpr1770)	<p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local</p>	<p>Comments noted.</p> <p>The developer would be encouraged to liaise with Thames Water during the planning application process, and to take</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site</p> <p>Groundwater: The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p> <p>Whilst Thames Water have no concerns for this development, please be aware that there is no sewer network serving the area.</p>	<p>appropriate advice regarding groundwater protection, taking into account LPR Proposed Submission Policy DM7. The developer would need to plan for no sewer network serving the area.</p>
Wokingham Borough Council (lpr1472)	<p>Policy RSA 33 proposes to allocate a site at Long Copse Farm, Enborne for a Travelling Showpersons yard comprising 24 plots. This site would meet the identified need in full to 2036. Again, this proposed allocation is carried forward from the existing HSA.</p> <p>However, it is noted that the plan period covers an additional year (to 2037) compared to the GTAA. It is therefore unclear how or whether this additional year's need is taken into account.</p>	<p>Comments noted.</p> <p>The GTAA 2021 has been updated to extend the period to 2037/38. The GTAA did not identify a further need for Travelling Showpeople, and the site at Long Copse Farm would be able to meet the need.</p>
<b>General consultation bodies</b>		
NA		
<b>Other stakeholders</b>		
Peter Benest (lpr31)	<p>This site is supposedly for travelling show people only. 24 pitches in 5 years. As show people they will spend some time off the road resting [winter?]. Surely they would be more settled living in mainstream permanent housing with the land at Long Copse reverting to agricultural use. There is also local concern re the HGV Circus traffic using the narrow lanes, particularly in the vicinity of the Craven Arms Public House.</p>	<p>Comments noted.</p> <p>The Government document 'Planning policy for Traveller Sites' (updated 2015) requires an assessment of the current needs for Travelling Showpeople (as well as Gypsies and Travellers) and a projection of future needs.</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Travelling Showpeople require permanent sites for the storage of their equipment and to live when not travelling. It is individual choice of whether occupants would prefer to live in bricks and mortar but the Council is required to plan for the needs of Travelling Showpeople.</p> <p>The policy requires the submission of a Transport Assessment, which would identify improvements to Wheatlands Lane, and achieving appropriate sight lines at the existing access points to Wheatlands Lane. Where appropriate road widening and passing places east of the site will be explored.</p>
Councillor Tony Vickers (lpr995)	Agrees with the proposed policy.	Comments noted.
<b>Landowners, site promoters and developers</b>		
NA		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC1 Development in the Countryside

### (Proposed Submission LPR Policy: DM1 Residential Development in the Countryside)

Number of responses received: 21

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr908)	GPC would like to make an explicit reference to Zero carbon homes. To allow for innovative solutions in response to climate change. Developments that achieve or closely approach zero carbon or better in terms of their overall impact in any location within the countryside are likely to be looked on favourably, if they also fit one or more of the above criteria Cross-ref. to DC23 & DC33.	Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Emerging Draft LPR Policies SP5, SP7, SP8 and DC3 Building Sustainable Homes. The policies make clear that all development, regardless of its location, should contribute to West Berkshire becoming and staying carbon neutral by 2030. Even if a development is carbon neutral or better it should still confirm with other relevant policies in the Plan.
Hungerford Town Council (lpr150)	Supports the policy	Comments noted
Newbury Town Council (lpr2246)	Make explicit reference to zero carbon homes. <b>Reason:</b> To allow for innovative solutions in response to climate change. <b>Change Proposed:</b> In 9.7 of the supporting text and especially in relation to 'c', 'd' and 'j' of the listed 'criteria' in the policy, add the following sentence:	Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Emerging Draft LPR Policies SP5, SP7, SP8 and DC3 Building Sustainable Homes. The policies make clear that all development, regardless of its location, should

Respondent (with lpr ref)	Response	Council Response
	“Developments that achieve or closely approach zero carbon or better in terms of their overall impact in any location within the countryside are likely to be looked on favourably, if they also fit one or more of the above criteria.” Cross-ref. to DC23 & DC33.	contribute to West Berkshire becoming and staying carbon neutral by 2030. Even if a development is carbon neutral or better it should still confirm with other relevant policies in the Plan.
Shaw cum Donnington Parish Council (lpr220)	We support this policy	Comments noted
Stratfield Mortimer Parish Council (lpr409)	Supports the policy	Comments noted
Thatcham Town Council (lpr1411)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>As we have noted in SP17 there is an inconsistency in policy between selecting SP17 as a strategic site and DC1 that sets a presumption against development in the countryside and outside settlement boundaries. This is a position that West Berkshire Council argued strongly in 2016/7 for the Siege Cross development noting that Siege Cross contains historic settlements, is best and most versatile land, and forms part of the setting of AONB making a positive contribution to the wider landscape. It is necessary for the countryside in Thatcham to be given the same weighting in protection, to that of countryside elsewhere.</p>	Comments noted. The Council is undertaking a review of settlement boundaries (SBR) as part of the LPR. The SBR criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded. This makes clear that sites allocated through the LPR will be included within the boundary. Such sites are only allocated through the plan led process after a thorough site assessment and sustainability appraisal. For North East Thatcham the site assessment has included a Landscape Sensitivity Assessment which is being published as part of the evidence base for the LPR. There is therefore no conflict with Emerging Draft LPR Policy SP1 or Policy DC1.
<b>General consultation bodies</b>		
Canal and River Trust (lpr884)	This policy allows for development that support the rural economy, so would be relevant to marina applications, and boating related businesses in general. With this policy having a presumption against development outside of a settlement boundary it should be recognised that many boating related businesses are non- footloose, due to needing to be located adjacent to the canal, and so need to be located outside of a settlement boundary. We would hope that water-based development would be considered favourably subject to the requirements of policy DC32.Can this be clarified?	Comments noted. The Council believes this issue would be best considered under Emerging Draft LPR Policy DC32 and so as the respondent has made similar comments (lpr907) under that policy, the Council’s response is set out there.  Emerging Draft LPR Policy DC1 will be amended for the Proposed Submission LPR to cover residential

Respondent (with lpr ref)	Response	Council Response
		development in the countryside only. This is in the interests of clarity. Proposed Submission LPR Policy DM35 will set out the Council's approach to sustaining a prosperous rural economy.
West Berkshire Green Exchange (lpr1558)	<p>Exceptions to this are solely limited to development which is appropriately designed and located and satisfies one or more of the following criteria:</p> <p>.....</p> <p>j. development of an isolated new dwelling whose design is of exceptional quality, truly outstanding or innovative, reflecting the highest standards in architecture, and which significantly enhances its immediate setting and is sensitive to the defining characteristics of the local area; <u>and which are built to HQM level 5 and an HEPR of 0.900 or above.</u></p>	Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Emerging Draft LPR Policies SP5 Climate Change, SP7 Design Principles, SP8 Landscape Character and DC3 Building Sustainable Homes. The policies make clear that all development, regardless of its location, should contribute to West Berkshire becoming and staying carbon neutral by 2030. Even if a development is carbon neutral or better it should still confirm with other relevant policies in the Plan.
West Berkshire Heritage Forum (lpr87)	Supports the policy. The AONB (which could be equally termed an Area of Outstanding Cultivated Landscape) is not a self-sustaining resource but is maintained by the rural businesses located in it. To do this, the local businesses must remain viable and this will require them to grow and develop. Such appropriate development should be allowed for expressly.	<p>Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Emerging Draft LPR Policies SP2 North Wessex Downs AONB.</p> <p>Emerging Draft LPR Policy DC1 will be amended for the Proposed Submission LPR to cover residential development in the countryside only. This is in the interests of clarity. Proposed Submission LPR Policy DM35 will set out the Council's approach to sustaining a prosperous rural economy.</p>
<b>Other stakeholders</b>		
Peter Benest (lpr32)	Whilst there is a presumption against, there are too many 'get out' clauses.	Comments noted. The LPR has to be prepared in accordance with the National Planning Policy Framework (NPPF).
Sam Coppinger (lpr304)	Supports the policy	Comments noted

Respondent (with lpr ref)	Response	Council Response
Ian Parsons (lpr834)	The importance of the existing settlement boundary should be recognised. In addition, infill building should be discouraged unless it can be shown that it makes a significant contribution to the life of the local community - CIL money is not enough in this regard.	Comments noted. The importance of the settlement boundary is clearly recognised in both Emerging Draft LPR Policies SP1 and DC1.
Councillor Tony Vickers (lpr581)	We strongly support having some controls along these lines in the Plan but wish to see explicit reference to zero carbon homes and some relaxation of controls for them to encourage innovative solutions in response to climate change. In 9.7 of the supporting text and especially in relation to ‘c’, ‘d’ and ‘j’ of the listed ‘criteria’ in the policy, add the following sentence: “Developments that achieve or closely approach zero carbon or better in terms of their overall impact in any location within the countryside are likely to be looked on favourably, if they also fit one or more of the above criteria.” Cross-reference to DC23 & DC33.	Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Emerging Draft LPR Policies SP5 Climate Change, SP7 Design Principles, SP8 Landscape Character and DC3 Building Sustainable Homes. The policies make clear that all development, regardless of its location, should contribute to West Berkshire becoming and staying carbon neutral by 2030. Even if a development is carbon neutral or better it should still confirm with other relevant policies in the Plan.
<b>Landowners, site promoters and developers</b>		
Barton Willmore for Copas Farms (lpr1973)	Our client supports the identification of the redevelopment of PDL as an exception to the presumption against new development outside of adopted settlement boundaries. As indicated above, PDL supports the NPPF’s emphasis on making as much use as possible of PDL or brownfield land and can assist in supporting the provision of much needed smaller sites across the District.	Comments noted.  Emerging Draft LPR Policy DC1 will now be amended for the Proposed Submission LPR to cover residential development in the countryside only. This is in the interests of clarity. Proposed Submission LPR Policy DM35 will set out the Council’s approach to sustaining a prosperous rural economy. The supporting text to the policy will state - <u>‘The overarching spatial strategy for West Berkshire focuses development on previously developed land (PDL). Whilst developers are expected to make the best use of PDL within settlement boundaries, this policy provides some limited flexibility, to allow for some development on PDL in the countryside to enable the sustainable growth of rural businesses and/or to meet the needs of the local community through the development of accessible local services or community facilities, as long as it meets the wider objectives of the Local Plan. However,</u>



Respondent (with lpr ref)	Response	Council Response
		<u>all proposals will firstly be considered in a landscape led context because previously developed sites will not always be appropriate in terms of landscape character. Wider development needs and pressures will not be accepted as a reason to develop on any site outside of settlement boundaries.'</u>
Fisher German for Mr M & W Musgrave & Begley (1234)	<p>Whilst we broadly support Policy DC1, we consider a further criterion must be added to ensure the Plan is as flexible and robust as possible. Whilst there is an allowance for rural exception sites, we consider that this Policy does not go far enough in that it only relates to affordable housing need. Clearly there may equally be market housing need in any given settlement, and it is considered unfair and prejudicial that by not qualifying for affordable housing would preclude people from having access to suitable housing in their chosen area. Smaller settlements do not always have suitable housing available for sale at any time, so this cannot be used as justification for such an approach. It is considered that market and affordable housing needs could exist in a given settlement and should be treated equally. To manage such a criterion, there could be a requirement that any such scheme must be supported by appropriate evidence, for example a housing needs survey. If there is a need for market housing, it could be a requirement that it must be demonstrated that there is not appropriate accommodation for sale. This approach ensures that market housing is not built unduly and is considered fair, ensuring that the Plan remains flexible and is able to respond to emerging rural housing needs throughout the Plan period. This approach would also assist the Council in meeting its high windfall targets.</p>	<p>Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Policy SP1 which sets out the overall spatial strategy for housing across the District.</p> <p>In that context, Emerging Draft LPR Policy DC16 and paragraph 11.7 of the supporting text make clear that rural exception schemes can allow for a proportion of market housing where this enables the closing of a funding gap (which must be evidenced) and where the market homes are integrated with the affordable homes to form a single scheme.</p>
Fowler Architecture (lpr1790)	<p>It is unclear why the policy opens by stating there is a 'presumption against new development' in the countryside. The NPPF is clear that sustainable development can occur in the countryside, including but not limited to those specified at paragraphs 79, 83 and 84. There are clearly typologies of sustainable development relating to land-based and rural enterprises that cannot occur outside of the countryside, consequently there is no presumption against such development when reading the NPPF. It is our recommendation that the policy must open by setting out a positive vision</p>	<p>Comments noted.</p> <p>This policy is set within the context of the Council's spatial strategy, Policy SP1, which will be amended as follows - 'The focus of development in each spatial area will follow the District-wide settlement hierarchy set out in Policy SP3 which takes account of the function and sustainability of settlements across the District and promotes sustainable</p>

Respondent (with lpr ref)	Response	Council Response
	<p>and thereafter define the typologies of sustainable development within the countryside.</p> <p>Criterion (d) goes beyond the NPPF paragraph 79(c) that requires that the re-use of redundant or disused buildings should enhance its immediate setting only in isolated locations. Not all locations in the countryside (as defined for planning purposes) will be isolated. Enhancement is of course desirable, however re-use of a disused building or site may prevent long term environmental degradation over time, which – if the Council is resolved to seek further direct environmental benefit from the (already beneficial) re-use of existing buildings – must be taken into account when considering the impact upon the setting. As such, while schemes in non-isolated locations may enhance their immediate setting, and this may be desirable, the Local Plan goes beyond the NPPF in making enhancement determinative of the principle of development and this is unjustified.</p> <p>Criterion (I) carries forward Housing Site Allocations DPD Policy C1 in supporting limited infill development (one or two units) which may be possible in settlements without a defined settlement boundary where it is appropriately located within a group of existing dwellings. The principles of this policy and flexibility in utilising infill in all settlements to meet housing need are supported, however we have two concerns.</p> <p>Firstly, there is tension in identifying how gaps and clusters are required to be a 'closely knit cluster'. Invariably closely knit clusters do not contain gaps or small undeveloped plots, particularly when the policy limits development to frontages. We therefore question the actual effectiveness of carrying forward the existing policy without a review of its terms and ability to effectively utilise land within all settlements.</p> <p>Secondly, the policy should also explicitly support the conversion or subdivision of buildings in settlements in the countryside. In supporting conversions, it should not be a requirement to demonstrate that a building is genuinely disused or redundant (as per Policy DC23(ii)).</p> <p>As such, the policy should be revised to be permissive by:</p> <ul style="list-style-type: none"> <li>- Replacing the term 'existing dwellings' under criterion (i) with 'existing buildings'. Whereby a settlement can qualify under this policy where an</li> </ul>	<p>communities. <del>There will be a presumption in favour of sustainable</del> Development and redevelopment within the settlement boundaries of those settlements identified in Appendix 2 and outlined on the Policies Map <u>will be supported</u>. Outside of settlement boundaries land will be treated as open countryside where development will be more restricted, as set out in Policy DGM1 <u>and DM35</u>.  ..... <u>Proposals to strengthen and diversify the rural economy will be encouraged, particularly where they are located in or adjacent to Rural Service Centres and Service Villages identified in the settlement hierarchy. Existing small and medium sized enterprises within the countryside will be supported in order to provide local job opportunities and maintain the vitality of smaller rural settlements and their communities.</u></p> <p>Emerging Draft LPR Policy DC1 will be amended for the Proposed Submission LPR to cover residential development in the countryside only. This is in the interests of clarity. Proposed Submission LPR Policy DM35 will set out the Council's approach to sustaining a prosperous rural economy.</p> <p>The policy will be applied in accordance with other policies in the LPR including Emerging Draft LPR Policies SP7 Design Principles and SP8 Landscape Character. These make clear that new development will strengthen a sense of place through high quality, locally distinctive design and will be landscape led, conserving and enhancing the landscape character and the historic context of both the site and its surroundings.</p> <p>As this policy already makes clear that the Council's approach to the conversion of existing redundant and disused buildings is set out in Emerging Draft LPR</p>

Respondent (with lpr ref)	Response	Council Response
	<p>existing community facility, employment or service (such as a public house, shop, employment, hall, church) exists as part of a group of dwellings</p> <ul style="list-style-type: none"> <li>- Removing the restriction under criterion (i) that the infill development should be located 'adjacent to, or fronting an existing highway'. Instead, criterion (i) should state 'It is within a closely knit cluster of 10 or more buildings'. This provides greater recognition that groups of dwellings exist, including where a proportion are situated in a backland position.</li> <li>- Promotion of the use of previously developed land for housing at qualifying groups.</li> <li>- Expressly support the conversion of existing buildings and subdivision.</li> </ul>	<p>Policy DC23, for clarity it will amend criterion d) as follows – 'conversion and/or re-use of redundant or disused buildings which would enhance their immediate setting in accordance with Policy DC23;'</p> <p>Criterion I has worked well to date and the Council considers it provides both flexibility and an appropriate balance. Development in the countryside is strictly limited, particularly for residential development. This follows the approach in the NPPF in directing development to sustainable communities. The policy is not intended to allow the conversion/subdivision of all buildings within the countryside, and this follows the approach in the NPPF.</p> <p>Emerging Draft LPR para 11.48 makes clear that not all buildings will be suitable for conversion, due to their location, condition or appearance. Para 11.49 also states that 'the redevelopment of derelict buildings, are classed as new residential development in the countryside and would be assessed against Policy DC1.</p> <p>Backland development may not always be appropriate when considering the character of a settlement. Many settlements are linear in form and pattern, and backland can be damaging to this character.</p>
Lucy White Planning for Bradfield College (lpr1155)	<p>Bradfield Colleges supports the provisions within policy DC1 for development to be permitted outside adopted settlement boundaries which accords with Policy DC32. This comprises development to support the rural economy, in accordance with paragraph 83 of the National Planning Policy Framework (2019).</p> <p>The College also supports the provision for rural worker housing, including staff accommodation to serve education establishments, to be provided</p>	Comments noted

Respondent (with lpr ref)	Response	Council Response
	outside the adopted settlement boundaries, where proposals accord with Policy DC22 and paragraphs 77-79 of the National Planning Policy Framework (2019). Detailed comments on policies DC22 and DC32 are set out in separate responses.	
Pro Vision for Wasing Estate (lpr2066)	In relation to land at Manor Farm, Brimpton (full representation attached) Draft Policy DC1 explains that although there will be a presumption against new development outside of adopted settlement boundaries, there will be exceptions, such as sites allocated as part of the Development Plan. We support this, recognising the importance of sustainable growth in rural communities to help enhance their vitality, as highlighted in the NPPF.	Comments noted
Rural Solutions for Karine Giannamore (lpr2305)	<p>Policy DC1 is perceived as overly restrictive, not in line with the social economic responsibilities that the emerging Local Plan should consider for rural areas.</p> <p>In line with the NPPF, paragraph 78 states “<i>To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.</i>”</p> <p>We reinforce the use of an additional circumstance within the policy which does allow small-scale development. The term ‘small-scale’ could be defined to ‘no more 6 dwellings within parishes’ that don’t have a defined settlement boundary / or within the village cluster areas.</p> <p>One Part of Policy DC1 tries to achieve the above by:</p> <ol style="list-style-type: none"> <li>i. <i>limited residential infill in settlements in the countryside with no defined settlement boundary where:</i></li> <li>ii. <i>it is within a closely knit cluster of 10 or more existing dwellings adjacent to, or fronting an existing highway; and</i></li> <li>iii. <i>the scale of development consists of infilling a small undeveloped plot commensurate with the scale and character of existing dwellings within an otherwise built-up frontage; and</i></li> <li>iv. <i>it does not extend the existing frontage at either end; and</i></li> </ol>	<p>Comments noted.</p> <p>This policy is set within the context of the Council’s spatial strategy, Policy SP1, which makes clear that: ‘The focus of development in each spatial area will follow the District-wide settlement hierarchy set out in Policy SP3 which takes account of the function and sustainability of settlements across the District and promotes sustainable communities.’</p> <p>In terms of the threshold for limited infill development, 10 dwellings is considered appropriate. It clearly indicates the scale and level of existing development the Council would expect in order for this exception to the policy to apply. It accords with the definition of minor development as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>Criterion I has worked well to date and the Council considers it provides both flexibility and an appropriate balance. Development in the countryside is strictly limited, particularly for residential development and the policy is clear that proposals must not harm or undermine the existing relationship of a settlement within the open</p>

Respondent (with lpr ref)	Response	Council Response
	<p>v. <i>the proposed plot size and spacing between dwellings is similar to adjacent properties and respects the rural character and street scene of the locality</i></p> <p><i>Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not enhance the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.</i></p> <p>We agree with the requirement that the site should be located adjacent an existing cluster of existing dwellings, but suggest this should go further and perhaps it could be worded to state ‘along a continuous road frontage’ where dwellings / built form are situated.</p> <p>Suggest that i) has the word “approximately” added, so there is some flexibility in the number of dwellings found along a frontage. 10 dwellings does seem appropriate.</p> <p>However, we consider the third criteria of the policy “<i>iii. it does not extend the existing frontage at either end</i>” is too restrictive. Some villages which are characterised by a ribbon form of development could achieve sustainable and proportionate growth using this infill policy, but the opportunities for this would be somewhat hampered by criteria iii. Having a sensible restriction of say 6 dwellings and ensuring that village identities are retained as a result would be sufficient to ensuring that development is proportionate to its context, alongside other Local Plan Policies which seek to protect the landscape.</p> <p>This policy could also be used to support Self and Custom Build Homes, as this is unlikely to be delivered within the proposed allocations as indicated in the policy currently. People looking to purchase plots for self and custom build housing are unlikely to seek locations within an area that contains large scale major development. It is more akin to small sized developments or village locations.</p>	<p>countryside. Inappropriately elongating existing linear settlements could be harmful, particularly in the AONB. Infill development is more appropriate as it doesn’t extend development further out of a settlement’s ‘natural’ boundaries, but focuses it within them.</p> <p>The Council has proposed residential allocations in the LPR that will include an element of self-build (North East Thatcham and Purley Rise). Such homes are not necessarily located in rural areas.</p>
Savills for Englefield Estate (lpr1536)	Draft LPR Policy DC1 sets out a presumption against new development outside of adopted settlement boundaries apart from a number of stated exceptions. It is noted that the Council is currently reviewing where and how settlement boundaries are drawn across the district, as set out at LPR	<p>Comments noted.</p> <p>The settlement boundary review (SBR) criteria set out the general principles followed when defining a boundary and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Appendix 3, which will help to inform where Policy DC1 is applied. As explained above, it is our view that a settlement boundary should be identified at Englefield to facilitate sustainable development within the village. It is also recommended, with regard to the criteria set out at LPR Appendix 3, that adopted settlement boundaries are drawn to allow flexibility for appropriate limited future expansion.</p> <p>Given the predominantly rural character of the district, it is crucial that adequate provision is made for development in the countryside in order to meet rural needs. This is reflected in paragraphs 77-79 of the NPPF which encourage sustainable development in rural areas to meet local needs and to enhance the vitality of rural communities. The exceptions which are set out at parts a-l of draft Policy DC1 provide additional clarity to that of Policy C1 of the HSA DPD (which would be superseded by Policy DC1, as per LPR Appendix 9) and reflect the provisions of NPPF paragraph 79. The additional exception of part b 'development which supports the rural economy in accordance with policy DC32' in particular is welcomed and supported. ....</p> <p>Part k of draft Policy DC1 supports enabling development outside settlement boundaries to secure the future of a heritage asset, however this is subject to a number of additional caveats which are considered to be onerous and unjustified, based on the NPPF, and should therefore be removed in order to ensure that necessary enabling development can occur.</p> <p>The requirement for all developments to '<i>enhance the character and distinctiveness of the rural area</i>' should be amended to instead require that developments conserve the character and distinctiveness of the rural area. This will help to ensure that appropriate development will come forward to meet the needs of the rural area whilst continuing to protect its character.</p> <p>The Estate's experience previously is that similar policies have been applied to prohibit development; however as set out above, given the rural character of the district and development needs, it is critical that draft LPR DC1 is applied positively in line with paragraphs 77-78 of the NPPF.</p>	<p>give guidance as to what would usually be included and what would usually be excluded.</p> <p>There is no existing settlement boundary around the settlement at Englefield and the SBR does not propose to introduce one. The informal nature of Englefield and the strong relationship it has as part of the wider rural landscape means that the introduction of a boundary is still not considered the best way forward.</p> <p>Paragraph 9.8 of the Emerging Draft LPR makes clear that enabling development should only ever be regarded as a last resort in restoring heritage assets and that the Council will use the tests set by Historic England to determine any proposals submitted. For the Proposed Submission LPR the policy and supporting text will be amended to remove the sections on enabling development. These will instead be incorporated into Policy SP9 and its supporting text.</p> <p>It is agreed the LPR should clarify this issue and so the final paragraph of the policy will be amended as follows – '..... where it does not <del>enhance</del> <u>contribute to</u> the character and distinctiveness of the rural area.....'</p>
Turley for A2 Dominion (lpr1498)	<p><i>Full representations made by Turley on behalf of A2 Dominion in relation to Land East of Reading Road, Streatley are attached.</i></p> <p>As discussed elsewhere in these representations, there is an internal conflict between the presumption in favour of development within settlements in Policy SP1 (Spatial Strategy) (and a presumption against development</p>	<p>Comments noted. The policy will be considered within the context of Policy SP1. The LPR should be read as a whole.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>outside of settlements) and the broadly permissive approach set out in Policy DC18 (Specialised Housing) which requires <i>“The location is appropriate, in terms of accessibility of facilities, services and public transport.”</i></p> <p>For reasons we set out above, the Local Plan should be amended so as to avoid this internal inconsistency and ensure that it acts to support the delivery of specialist accommodation. If that flexibility is not embedded into the Local Plan, it is unlikely that the needs of this important (and growing) group of the community will be met.</p> <p>The Local Plan should be amended so as to avoid this internal inconsistency between the presumption in favour of development within settlements in Policy SP1 (Spatial Strategy) and a presumption against development outside of settlements, and the broadly permissive approach set out in Policy DC18 and ensure that it acts to support the delivery of specialist accommodation.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC2 Health & Wellbeing

### (Proposed Submission LPR Policy: DM3 Health & Wellbeing)

Number of responses received: 13

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
N/A		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr151)	Supports the policy	Comments noted
Newbury Town Council (lpr2245)	We support this policy. This is a vital aspect of “place making”. However, it needs to take account of the whole life of the development, its surroundings, and future occupants - not just initial build quality and residents.	Comments noted. The supporting text makes clear that Health Impact Assessments will consider the likelihood, significance and duration of both the potential positive and negative impacts of proposals and will identify what will be monitored, how and by whom. They will also take into account the cumulative impacts of development.
Shaw cum Donnington Parish Council (lpr221)	We support this policy. It is difficult to understand how the policy will be applied. For example, with the North Newbury Development no Health Impact assessment appears to have been made and it is difficult to appreciate what it might have said.	Comments noted. The policy cannot be applied retrospectively, The policy makes clear that a Health Impact Assessment should be prepared in accordance with guidance from Public Health England and the supporting text of the policy sets out what would be required as part of this.



Respondent (with lpr ref)	Response	Council Response
Stratfield Mortimer Parish Council (lpr410)	Supports the policy	Comments noted
Thatcham Town Council (lpr1412)	<ul style="list-style-type: none"> <li>"will promote, support and enhance positive mental and physical health and wellbeing and thus contribute to reducing health inequalities."</li> </ul> <p>As we have noted in SP 17 and earlier, the loss of green-space and rights-of-way to neighbouring countryside will have an adverse impact on the wellbeing of existing residents in Thatcham. Of all responses received from residents to Councillors the most pressing concern is the loss of green-space and this dominates over other aspects including GP access. We therefore disagree that SP 17, and Thatcham NE, is an outcome that either promotes, supports, or enhances wellbeing.</p> <p>Residents in Thatcham have lost green space over recent years. Several of the playing fields and parks have been subsumed within the flood alleviation works with the result that the fields hold water for greater periods of the year. The woodland in Dunston Park that was promoted as recreational space when that housing estate was being developed was subsequently not adopted by West Berkshire Council on completion of the estate; consequently, the land has been partitioned into individual lots and sold privately preventing long-term management of an Ancient Woodland and restricting access. Land that is legally recognised as access land for recreational purposes adjacent to the Nature Discovery Centre is fenced off by West Berkshire due to concerns related to gas emissions from underground waste and therefore is unlikely to be made accessible. The loss of this green belt for NE Thatcham will be felt negatively across a very large community.</p> <ul style="list-style-type: none"> <li>"Development that would have an unacceptable impact on the health or wellbeing of existing or new communities will not be permitted."</li> </ul> <p>It is necessary to define and quantify what is an unacceptable impact on health. As well as the loss of natural green-space and the subsuming of rights-of-way within a housing development, the development of SP 17 will</p>	<p>Comments noted.</p> <p>As far as defining and quantifying what is an unacceptable impact on health, the policy makes clear that a Health Impact Assessment will need be prepared in accordance with guidance from Public Health England. The supporting text makes clear that Health Impact Assessments will consider the likelihood, significance and duration of both the potential positive and negative impacts of proposals and will identify what will be monitored, how and by whom. They will also take into account the cumulative impacts of development.</p> <p>Other issues are considered as part of the Council response to issues raised under Policy SP17.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>increase traffic and congestion in an Air Quality Management Area and add to noise pollution.</p> <p>In our view the loss of wellbeing on existing communities arising through the loss of surrounding countryside, noise pollution from increased traffic in close proximity to properties on Floral Way, and air quality on the A4, result in an unacceptable conflict between this policy and SP 17. This must be addressed for existing residents.</p>	
<b>General consultation bodies</b>		
British Horse Society (lpr856)	<p>The Society supports this policy. Provision of active travel routes near developments and public open space as part of developments (eg Sandleford &amp; North east Thatcham) encourage healthy lifestyles.</p> <p>Please note our suggested insert in relation to SP22 Transport: <i>‘Housing and industrial development inevitably brings increased motor traffic to local roads including those minor roads favoured by non-motorised users. As traffic levels increase, use of roads by non-motorised users decreases. Provision for all non-motorised users needs to be made to encourage healthy lifestyles’</i></p> <p>The Society encourages the use of the term ‘non-motorised user’ in the whole document as favoured by Highway England, though for the avoidance of any doubt it would be good to see this appended with the phrase “..including equestrians.”. Use of the terms ‘pedestrian &amp; cyclists’ is not inclusive of equestrians as well as other legal road users, and causes difficulties for us as we often have to make the case for equestrians project by project.</p>	Comments noted.
Canal and River Trust (lpr885)	<p>Fully supported please note that the Kennet &amp; Avon canal uses an ampersand (paragraph 10.2) any new water based activities on the canal, as promoted through the draft Leisure strategy 2021-2031 should be discussed with the Canal &amp; River Trust at the earliest opportunity, and preferably before planning permission is sought.</p>	Comments noted. References to the Kennet & Avon Canal will be amended throughout the LPR accordingly.
Mid and West Berkshire Local	<p>MWBLAF supports this policy. Provision of active travel routes near developments and public open space as part of developments (eg Sandleford &amp; North East Thatcham) encourage healthy lifestyles.</p>	Comments noted.

Respondent (with lpr ref)	Response	Council Response
Access Forum (lpr1885)	<p>The supporting text mentions the Council’s draft Leisure Strategy. In its response to the consultation on this draft, the Forum pointed out that “Dog walking is a popular way of taking physical activity including those in older age groups.” Of all leisure activities, dog walking is probably the one that is most dependent on suitable provisions within the layout of a development. We note that Hampshire County Council has a guidance document “Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value”:</p> <p>The Forum recommends that a paragraph is added to the supporting text for this policy to recognise the importance of dog walking, and this should be developed further in policy DC 37 – Public Open Space.</p> <p>Please note our suggested insert in relation to SP22 Transport: Housing and industrial development inevitably brings increased motor traffic to local roads including those minor roads favoured by non-motorised users. As traffic levels increase, use of roads by non-motorised users decreases. Provision for all non-motorised users needs to be made to encourage healthy lifestyles.</p> <p>The Forum recommends that the following paragraph should be added to the supporting text for this policy (with wording taken from the Hampshire guidance document): <b><u>Dog walking is a popular way of taking physical activity including those in older age groups. Dog owners are traditionally one of the most frequent, year-round users of urban greenspace and public access to the wider countryside. The particular needs of dog walkers should be considered in the design of developments – see policy DC37 on Public Open Space.</u></b></p>	<p>The Council believes that this issue is best considered under Emerging Draft Policy DC37 and as the respondent has made similar comments (lpr1892) under that policy, the Council’s response is set out there.</p>
West Berkshire Heritage Forum (lpr90)	<p>Supports the policy. The Council should encourage the installation of automatic fire suppression (sprinklers) in appropriate buildings that are not mandated to have them. This includes dwellings of multiple occupation (flats, care homes, hotels, boarding houses and guest houses), buildings frequented by the public (halls, shops and leisure centres), industrial buildings and offices.</p> <p>Supporting text: No one has lost their life in the UK in a building equipped with working sprinklers. The damage done by a fire in an equipped building is greatly reduced to the extent that a building can be brought back into use in a short time.</p>	<p>Comments noted. The Council believes this issue is best considered under Policy SP7 which sets out the Council’s strategic approach to the principles of design.</p>

Respondent (with lpr ref)	Response	Council Response
<b>Other stakeholders</b>		
Sam Coppinger (lpr305)	Supports the policy	Comments noted
Colin Duff (lpr455)	<p>With proposed major expansion to the West Berks population due to the Sandford and NE Thatcham developments hospital provision within West Berks itself will be woefully inadequate.</p> <p>GP capacity within West Berks is already strained - waiting for three weeks for a routine appointment is common - with practices claiming they cannot attract doctors to work in the area.</p> <p>A strategic plan with the NHS will be required to deliver both greater GP provision and full hospital facilities without having to travel, out of the district.</p>	<p>Comments noted. Proposed Submission LPR Policy SP24 sets out the Council's approach to infrastructure requirements and delivery.</p> <p>In preparing the LPR, the Council is working in partnership with infrastructure providers, both internal departments and external organisations, to identify the infrastructure required to support and facilitate the new development proposed. Details of this will be contained in the Council's Infrastructure Delivery Plan as well as the CIL Charging Schedule and related documents governing planning obligations.</p>
Nataliya Topliss (lpr813)	<p>Destroying 170 acres of green land will promote positive mental and physical health. Thatcham is a derelict grey town with very little trees and green spaces. Every single green space is given for the development. The residents of Thatcham have no green park to visit. We breathe congested air as West Berks Council does nothing to address local air quality issues.</p> <p>West Berks Council's strategy of 2012 identified, that after a period of rapid housing growth, infrastructure in Thatcham had failed to keep pace and there should be a period for regeneration and new facilities. Since then, there has been no such regeneration so the Council's conclusions of 2012 must still stand.</p>	<p>Comments noted.</p> <p>The issues raised are considered as part of the Council response to issues raised under Policy SP17.</p>
Councillor Tony Vickers (lpr582)	We strongly support this policy.	Comments noted
<b>Landowners, site promoters and developers</b>		
N/A		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC3 Building Sustainable Homes and Businesses

### (Proposed Submission LPR Policy: DM4 Building Sustainable Homes and Businesses)

Number of responses received: 30

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
West Berkshire Council Ecologist (lpr1694)	In the supporting text add a point about low tech solutions/building materials.	Comment noted.
<b>Statutory consultees</b>		
Environment Agency (lpr1679)	There appear to be some references that need completing in paragraph 10.19 "(XXXX)"	Comment noted. The policy has been amended.
Newbury Town Council (lpr2244)	We support the approach to homes having a nationally recognised and measurable standard of quality. However, we do not support the treatment of Renewable Energy are merely a class of Business: category "3". Reason: Renewable Energy should be a separate DC policy on its own to highlight its importance. There are 'developments' which are purely for renewable energy, e.g. solar arrays, micro-hydro and wind turbines. Under '3' currently there is 'A' which deals with renewable energy as part of a residential or commercial development. 'B' is for renewable energy developments that are 'stand-alone'. These should be in the Local Plan but as a separate category with its own policy, in particular to cover schemes in 'countryside'. This should be referenced in the proposed amendment to SP5 (see above) and only the sub- category "A" should be part of this policy.	The comments are noted. The Proposed Submission LPR policy is generally supportive of renewable energy schemes subject to and according to their proposed location.

Respondent (with lpr ref)	Response	Council Response
	<p>Changes: Change Proposed: New DC policy linked to an amended SP5 and worded as '3.B' here. The policy should also explicitly encourage developments that have local community backing and/or where the energy and/or revenue generated from the development will accrue to homes and/or businesses in West Berkshire.</p> <p>The Supporting Text from 10.22 to 10.24 should be moved to accompany the new policy.</p>	
Thatcham Town Council (lpr1413)	<p>We acknowledge that high quality and sustainable homes are essential for supporting the net zero carbon objectives of West Berkshire. We note that the West Berkshire Environment Strategy states the definition for net zero is that "carbon dioxide will be reduced to a net zero level. In other words, any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented". This inclusion of this definition is necessary to align terminology and should be part of this Policy.</p> <p>We recognise that Homes Quality Mark level 4 is a standard that is designed to deliver a high-quality holistic approach to dwellings and building communities. Nevertheless, there are aspects of the scheme that are open to being 'gamed' by developers as assessment issues deliver 'credits' can be played-off against each other. This is particularly the case for a large development where 'credits' can be obtained in one part of the development at relative ease that avoid more difficult issues being confronted. Careful oversight is required to ensure that good outcomes for West Berkshire are delivered.</p> <p>We would suggest that HQM Level 4 is a requirement, but that the 'credits' related to energy efficiency are called out explicitly. There may be several ways to do this: In the HQM request that a minimum of Home Energy Performance Ratio (HEPR) of 0.9 is specified. Define a Dwelling Emission Rate (DER) in Part L 1A that align with net zero and can be assessed using Standard Assessments Procedures (SAP) The disadvantage of (1) is that the HEPR calculation within HQM is based on a proprietary algorithm (although it appears to be related to Part L</p>	<p>Comments noted. The Proposed Submission LPR policy is generally supportive of renewable energy schemes subject to and according to their proposed location.</p> <p>The Proposed Submission LPR policy goes a long way to meet the requirements set out here.</p> <p>The Council is aware of the challenges in putting the new policies into practice and is looking at ways to ensure they are delivered satisfactorily.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Building Standards) and the selected value (HEPR=0.9) needs to be reviewed against their definition to ensure it does meet the objectives of the West Berkshire. This is beyond the scope of our assessment.</p> <p>Basing a solution on (2) enables West Berkshire to set their own targets. We understand that an approach by London Authorities attempts something similar, and where developers fail to meet the targets set, they pay a penalty towards carbon offsetting schemes. This produces a market incentive to deliver buildings that are close to net zero carbon and provides the Council with a revenue source to fund offsetting.</p> <p>Whatever approach is chosen key requirements are related to high quality insulation, airtightness, careful design to avoid cold-bridges, controlled ventilation and heat recovery. As buildings will no longer be heated by fossil fuels, the use of ground or air-source heat pumps are likely to become standard. We recommend that new buildings have radiators and associated plumbing designed for lower heat distribution - requiring larger surface areas and piping - in order the heat pumps can operate with high coefficients of performance. It is also likely that larger heat-stores will be required that enable solar heating of hot-water, or the use of immersion heaters from solar or off-peak low-carbon electricity, to be maximised and any supplemental high-carbon electricity to be minimised.</p> <p>An essential part of delivering high quality buildings is also related to enforcement. We would expect to see policy statements that define how testing to a defined target will be assessed. For example, airtightness may be measured on a subset of houses to ensure that standards are being met in the field. The enforcement procedure should also define penalties and remedies required if standards are not met.</p> <p>As we note earlier, we believe that renewable energy resource should be assessed in a similar manner to material extraction in advance of allocating planning and assigning land use. For example, solar radiance and wind are the key resources available. National policy has been opposed to onshore wind in recent years but there are indications this may change.</p> <p>We state in our response to SP 17 that the formal and legal relationship between the Master-Planning exercise and policies in the Local Plan is unclear. There is a statement in the Stage 3 masterplan that states "most of</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>the homes in NE Thatcham will not be connected to the gas grid". We believe that this should be a policy that applies to all new houses in order to de-carbonise heating and it should be reflected in policy DC 3.</p> <p>Finally, we also recognise that the national Better Homes Standards (Part L Building Standards) have recently been published by central government. An important outcome of the consultation, published on the 19th January 2021 during this Local Plan consultation period, is that "local authorities will retain powers to set local energy efficiency standards for new homes". Therefore, we fully expect that West Berkshire will chose to adopt policies that are consistent with their adopted Environment Strategy published in 2019.</p> <p>To align with the West Berks Environment Strategy the following amendments to policy are necessary:</p> <p>The policy should refer to the definition of net zero as described in the West Berkshire Environment Strategy</p> <p>All new developments must be carbon audited in order that required carbon offsetting aligned with the West Berkshire Environment Strategy can be quantified</p> <p>All new development must have legally binding zero-carbon policies</p> <p>Policies must reflect the latest national policy guidance on the Better Homes Standards</p> <p>Section 10.19 "natural environment (XXX) and health (xxx)" These statements appear to be incomplete.</p> <p>Section 10.24 "Where appropriate, renewal energy proposals will be integrated in to the proposed scheme" This appears to be a weak statement, as it enables a developer to make arguments to avoid renewable energy for many reasons. If an appropriate standard is set the renewable energy should be a central pillar of any multi-dwelling new development. If a development site has poor solar resource due to North facing a developer contribution towards offsetting should be sought (as noted earlier).</p> <p>Section 10.25 "Measures to increase the adoption of retro-fitting energy efficiency measures."</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>We support this measure. The transition towards net-zero starts with improving efficiency of assets (typically this is lower cost and returns higher carbon benefits) as renewable energy tends to be higher cost for the return on carbon delivered.</p> <p>Section 10.27 "Changes to national targets." As noted earlier we acknowledge this may happen sooner rather than later.</p> <p>Section 10.28 "The Council will carefully scrutinise proposals." We also expect Council to scrutinise carefully ongoing and final build quality.</p>	
Kintbury Parish Council (lpr1726)	The Parish Council fully supports the proposals for residential development to meet minimum standards of construction as included in Policy DC3.	The support is noted
Greenham Parish Council (lpr909)	Add comments from TV's document, plus Carbon neutral homes need to be locked in but in addition GPC would like to see houses with a HERP greater than .9 will have the full 40 points awarded, as .9 equals carbon neutrality and therefore delivery any houses that are better than .9, equals a carbon negative house, which is required to 'payback' the carbon emissions generated when building the houses.	Comments noted. The Council has taken a different approach which is now set out in the Proposed Submission LPR.
Shaw-cum-Donnington Parish Council (lpr222)	<p>Whilst we support the policy we do not understand how it will be enforced. As we understand it, dwellings only need to achieve minimum building regulations. In the past the Council attempted to enforce BREEAM excellent on new developments but this was abandoned after an appeal against the policy was lost. What is there to give confidence that any of these policies can be implemented without a change to the building regulations or addition powers to enforce such policies by government.</p> <p>A similar comment applies to renewable energy.</p> <p>10.17 We note that planning policy guidance allows LPAs to "set energy performance standards for new housing.... only to level 4 of Code for Sustainable Homes". We note that this was not imposed on the North Newbury development that only comes up to minimum building regulations. Policy used the terms HQM and BREEAM whilst 10.17 policy refer to Code for Sustainable Homes. It is difficult to understand from the text (without research) what this means in terms of what the policy can achieve.</p>	<p>Comments noted.</p> <p>The Council is aware of the challenges in putting the new policy into practice and is looking at ways to ensure they are delivered satisfactorily.</p>

Respondent (with lpr ref)	Response	Council Response
	10.22 We note that the Race Course development (or part of it) was expected to have a combined heat and power scheme that was dropped. So what assurances can we have that such policies can be enforced in the future.	
Hungerford Town Council (lpr152)	We agree in principle with the intent but...Whilst we understand that LPAs are constrained to some extent at least by central government dictat regarding their ability to require environmental standards of new homes, this continues to be a national policy area of woeful achievement. Central governments 2019/20 "Future Homes Standard" consultation has just now been published. We understand it now gives LPAs more scope for their own standards at least for the next few years and we would urge WBC to take full advantage of this option. Can the previous WBC Local Plan ambitions re Code Level 6 which were ruled out be re-instated? Even today in Hungerford and elsewhere new homes with gas boilers, no sustainable energy provision and the tradionally poor achieved energy performance are being built with impunity. We feel this policy should be much more demanding.	The support in general for the approach is noted.  The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.
Stratfield Mortimer Parish Council (lpr411)	We support this with reservations: It is good to see the inclusion of policies which will help with the fight against Climate change. However, bearing in mind the Government's increasingly tight requirements, are the standards in this policy adequate in both timing and scope? We would suggest not. For instance, why not go for HQM 4 star from the start of the plan?  Changes: Please see above. Would it also be sensible to future proof the policy by saying the very latest standards/requirements/innovations will be used?	The support in general for the approach is noted.
<b>General consultation bodies</b>		
Canal and River Trust (lpr886)	10.22 This paragraph should include water based Heating and Cooling schemes and HEP which can be delivered without any adverse impact on biodiversity. Any Energy Assessment proposing use of such technology for	Comments noted but the approach would not be appropriate for the majority of planning applications.

Respondent (with lpr ref)	Response	Council Response
	any major commercial or residential development (more than 100 houses) should demonstrate evidence of consultation with the Canal & River Trust. These sources should be included as options within studies of renewable energy potential. Applicants for major developments adjacent to the canal should consider whether the canal can be used to provide renewable energy and discuss this with the Canal & River Trust's Utilities team.	
Home Builders Federation (lpr1952)	<p>The Government, as the Council have noted in paragraph 10.17 and we have noted above, have stated in paragraph 6-012 of PPG that energy efficiency improvements should not be higher than those achieved by level 4 of the Code for Sustainable Homes (CSH). It is not clear whether the Housing Quality Mark would see improvements beyond level 4 and as such whether it is consistent with national policy. Given that from 2022 the new part L Building Regulation will see improvements higher than those achieved through level 4 of the CSH we do not consider it necessary to include an additional minimum standard.</p> <p>As set out in our comments on SP5 the HBF considers a universal standard is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. Therefore, the HBF consider the phased approach taken by Government towards adopting the Future Homes Standard in 2025 to be most effective way to achieve improvements in the energy efficiency of new homes whilst also maintaining delivery and that the requirement for</p> <p>Given that from 2022 the new part L Building Regulation will see improvements higher than those achieved through level 4 of the CSH we do not consider it necessary to include an additional minimum standard.</p> <p>The requirement for residential development to meet the Homes Quality Mark be deleted from DC3.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
West Berkshire Heritage Forum (lpr104)	Supports the policy	The support is noted.
<b>Other stakeholders</b>		

Respondent (with lpr ref)	Response	Council Response
Jonathan Alderman (lpr551)	<p>In paragraph 10.22 (i) CHP plant is included as an option for renewable electricity generation. The definition is very vague and open to interpretation. CHP plant without Carbon Capture and Storage technology fitted is detrimental to the Climate Change agenda. It also generates a serious impact on the Air Quality and health of residents living close to the CHP plant.</p> <p>CHP plant can also burn plastic (residual waste) and waste wood as a fuel stock, all a source of CO2 emissions.</p> <p>I would like to see the paragraph 10.22 (i) modified as follows:  "Combined heat and power (CHP) with a modest plant being able to serve a large number of dwellings and commercial uses in a small geographical area <b>may be considered subject to a full and comprehensive demonstration of the plant's green credentials, i.e., the integration of Carbon Capture and Storage (CCS) technology to significantly reduce CO2 emissions to the air and is fuelled by a fuel that generates less CO2 than fossil fuel-based feedstocks e.g., plastic or waste wood.</b>"</p>	Comments noted.
Susan Millington (lpr471)	<p>Unambitious target!  Why wait till 2029 to enforce 4 star ratings? Introduce immediately.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
Graham Storey (lpr592)	<p>Why wait till 2029 to enforce 4 star ratings?  Introduce immediately.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
West Berkshire Green Exchange (lpr1559)	<p><b>Energy Production</b>  In addition to renewable energy the Government's 10-point Green Industrial plan advocated the use of nuclear power to provide the continuous demand when renewables are unable to. West Berks is not a primary location for a 3GW power plant as these are reserved for coastal locations. However</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>certain locations may be suitable for a Small Modular Reactor including the AWE sites (which are already nuclear licensed) or RAF Welford.</p> <p>As far as possible, all new builds should include solar PV panels on the roofs, with local provision for power storage.</p>	
West Berkshire Green Party (lpr1845)	<p>We do not agree with waiting until 2029 to enforce 4-star ratings and propose that these should be introduced immediately.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
Councillor Tony Vickers (lpr585)	<p>We broadly support this policy but: proposals for Renewable Energy (e.g. solar farms) should be a distinct policy; the HQM requirement is not ambitious enough with large sites; and We wish to see reference to life-cycle carbon costs.</p> <ol style="list-style-type: none"> <li>1. Renewable Energy should be a separate DC policy on its own to elevate the status of the need to achieve zero carbon.</li> </ol> <p>There are 'developments' which are purely for renewable energy, e.g. solar arrays, micro-hydro and wind turbines. Under '3' in the policy currently there is 'A' which deals with renewable energy as part of a residential or commercial development. 'B' is for renewable energy developments that are 'stand-alone'. These should be in the Local Plan but as a separate category with its own policy, in particular to cover schemes in 'countryside'. This should be referenced in the proposed amendment to SP5 (see above).</p> <ol style="list-style-type: none"> <li>2. The requirement for development of up to 200 homes to achieve HQM 4 stars by 2029 is not ambitious enough. "10-200" and "200+" are ambiguous.</li> <li>3. We welcome the reference in 10.14 to "benefits derived by the end user".</li> </ol> <p>We also welcome the recognition that national guidance on sustainable development is very likely to change during the Plan period.</p> <p>Changes:</p>	<p>The broad support is noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>1. New DC policy linked to an amended SP5 and worded as '3.B' here. The policy should also explicitly encourage developments that have local community backing and/or where the energy and/or revenue generated from the development will accrue to homes and/or businesses in West Berkshire.</p> <p>The Supporting Text from 10.22 to 10.24 should be moved to accompany the new policy.</p> <p>2. The HQM requirements for 0-9 and 10-200 are the same and should be amalgamated.</p> <p>The requirement for 200+ homes needs to be qualified so that phases of a 200+ development that are themselves less than 200 homes are covered by the requirement.</p> <p>The timescale for the requirement to achieve HQM 4 stars should be changed to 2025.</p> <p>3. Add to end of supporting text 10.14 "Account should be taken of whole life-cycle costs in use of new and extended properties, especially those in residential use."</p>	
<b>Landowners, site promoters and developers</b>		
<p>Bloor Homes &amp; Sandford Farm (lpr2175)</p>	<p>Policy DC3 proposes that new residential development meet minimum standards of construction framed by BREAAAM's Housing Quality Mark.</p> <p>The Home Quality Mark is a voluntary scheme, whereas the practical effect of policy DC3 is to give it the statutory weight of the Development Plan. This policy should be recast to encourage new development to achieve and exceed these standards rather than obliging them to do so.</p> <p>We are aware that other draft Local Plans that include reference to the HQM do so largely in the above terms.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The policy also requires that, where appropriate, for a development of 10 or more dwellings, a minimum of 20% of future energy use is provided from renewable energy sources.</p> <p>The Government intends that amendments to the Building Regulations are the basis for improving the energy efficiency of new housing. In 2019, Government consulted on proposed changes to Building Regulations Part L which included the following two options:</p> <p>Option 1 – ‘Future Homes Fabric’: 20% reduction in CO2 emissions compared to current standards, envisaged to be met predominantly by very high fabric standards.</p> <p>Option 2 – ‘Fabric plus technology’: 31% reduction in CO2 emissions compared to current standards, to be met through higher fabric standards and low and zero carbon technologies.</p> <p>The Government recently published its response to the consultation and have signaled their intentions which point to Option 2. Importantly this allows for fabric first solutions and renewable energy.</p> <p>By requiring that 20% of future energy use is provided from renewable energy sources, this may prove to be inconsistent with the proposed changes to Building Regulations, which would not dictate how reductions in energy use and carbon dioxide emissions are achieved.</p> <p>In any event, these requirements will be enshrined in the Building Regulations and are not intended to be controlled by local planning policies. The Written Ministerial Statement on Plan Making dated 25 March 2015 and the PPG clarified the use of plan policies and conditions on energy performance standards for new housing developments. This Policy should be recast to reflect the above considerations.</p>	
Bluestone Planning for Darcliff Homes Ltd.(lpr2431)	The policy is considered to be a duplication of those matters already required by Building Regulations and because it is specific, it is likely to become out of date quickly. It would be more appropriate to require that	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>construction is required to meet the minimum standards set out by building regulations. Where specific named standards are referred to, these should be clarified as or their successors as well as offering an equivalent alternative to ensure that meeting standards is not prohibitively expensive or onerous to smaller developers.</p>	<p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
<p>CALA Homes (Chiltern) (lpr2367)</p>	<p>We also wish to comment generally of the draft development control policies. For example, addressing the causes and impacts of climate change, in the context of the Council declaring a climate emergency, is clearly a very important matter for the LPR.</p> <p>The policy needs to be precise to confirm what is expected of developers. It also needs to be supported by clear evidence, which appears to be lacking at this stage of the emerging plan.</p> <p>Evidence is needed, in particular, on viability of development, to ensure that development needs can be met. National planning policy guidance<sup>11</sup> states that:</p> <p>“The role for viability assessment is primarily at the plan makings stage” and that it “should not compromise sustainable development but should be used to ensure that polices are realistic, and total cumulative cost of relevant policies will not undermine deliverability of the plan”.</p> <p>The strategy should also include district wide initiatives not just individual developments, and therefore, there is likely to be a role for the Community Infrastructure Levy.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
<p>Copas Farms (lpr1975)</p>	<p>Draft policy DC3 set out the minimum standards of construction for both residential and non-residential development. Our client is aware of the emphasis in national policy that states (paragraph 148) that Council's support the transition to a low carbon future and shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience to the effects of climate change.</p> <p>However, due to site specific reasons (i.e. location of the site) or reason of viability, it may not be possible to meet these minimum requirements but still deliver a sustainable development.</p> <p>Changes:</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>On this basis we consider that the text for parts 1 and 2 of this draft policy should be amended as follows:</p> <ol style="list-style-type: none"> <li>1. Proposals for residential development will, where reasonably possible, meet the following minimum standards of construction unless:</li> <li>2. Proposals for new non-residential development will, <b>where reasonably possible</b>, meet the following minimum standards of construction:</li> </ol>	
Feltham Properties (lpr2284)	<p>Emerging Policy DC3 sets a requirement for new residential developments to meet the Homes Quality Mark (HQM). The supporting text in the Consultation Document advises that viability work undertaken for the Local Plan Review has already tested the viability based on “carbon neutral” development and has concluded it is not a barrier to development in West Berkshire. However, this evidence does not appear to have been published. While Feltham supports the move to carbon neutral, as a point of detail we have concern that the Policy is unsound in the absence of publishing this supporting evidence.</p> <p>Furthermore, the Government has established that through Part L and Part 6 of the Building Regulations, emissions allowed from new buildings will continually be reduced as a ‘stepping stone’ to “zero carbon” buildings. The Government will introduce the Future Homes Standard from 2025 which will produce 75-80% less carbon emissions than homes delivered under current regulations. Accordingly, it is considered that the Council should review the requirement to deliver the HQM and perhaps rely on nationally adopted standards and the subsequent introduction of the Future Homes Standard. This would provide a simpler and more streamlined process and does not rely on an independent certification model.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
Greenham Trust Ltd. (lpr2375)	<p>This representation on the Local Plan Review (LPR) is made on behalf of Greenham Trust (the Trust), specifically in regard to its interests at Greenham Business Park (GBP) as the major land owner and manager of the park.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>As such, the Trust is a stakeholder in the local plan process and is keen to engage proactively with the Council and other stakeholders to assist with preparing a positive and deliverable local plan to meet development needs in sustainable way over the plan period.</p> <p>The aspiration for achieving high standards for new residential and non-residential is supported in principle, noting the requirement for BREEAM Excellent on non-residential buildings.</p> <p>Our comments about viability and national guidance set out above in regard to draft Policy SP 5 also apply to draft Policy DC 3.</p> <p>The policy should be supported by evidence of feasibility and viability, through consultation with the development industry, and include some flexibility to allow for specific context so that otherwise suitable and sustainable development is delivered. For example, in some cases BREEAM Excellent may not be achievable or viable, but a proposal might still deliver development in accessible locations, or on previously developed land with high remediation costs, thereby delivering significant environmental benefits in specific ways.</p> <p>The LPR should be reviewed in respect of viability and other relevant evidence to underpin policy requirements so that development needs are delivered over the plan period while also addressing key issues including tackling the causes and impacts of climate change.</p>	
Lichfields for North East Thatcham Partnership (lpr2407)	<p>Hilson Moran has provided a detailed response to this policy in Appendix 1. In summary, whilst we acknowledge and support the objective of delivering sustainable homes, we are unpersuaded that the Home Quality Mark (HQM) ought to be mandated in local planning policy and consider that the delivery of sustainable buildings can still be met within the remit of other local plan policies (and building regulations). In particular, we note that the Government's recent consultation on the Future Homes Standard confirmed that whilst LPAs do have the power to set local energy efficiency standards for new homes:</p> <p><i>“as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less</i></p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.”</i></p> <p>The HQM mixes a range of measures which, aligned to the star thresholds and timed implementation, makes it unclear whether or not it is the appropriate basis for homes built on sites across the authority. We consider that more evidence is needed from the Council to confirm why the HQM needs to be set within policy and that the specific star ratings and time thresholds are justified and appropriate. We make these comments in the context that we are not aware of any other local plans including the HQM as a standard, making it a relatively untested measure for planning purposes. However, we fully concur that the BREEAM Assessment System can be used for non-residential development and are supportive in this regard. Absent justification that the HQM is an appropriate standard for enshrining in policy in the way it is, we would suggest the deletion of policy statements 1 and 3 of Policy DC3.</p>	
Lochailort Newbury Ltd (lpr2041)	<p>We support the Council's objective to achieve net zero carbon by 2030.</p> <p>Changes: here are two amendments required to the policy to ensure that its requirements do not prejudice development delivery:</p> <ol style="list-style-type: none"> <li>1. Minimum standards Requirements for residential development to meet specific Homes Quality Mark scores, for commercial development to meet minimum BREEAM scores, and for the benchmark minimum level of onsite electricity generation, must all be caveated with the following additional policy wording: "subject to viability and an assessment of the site-specific appropriateness of renewable energy technologies."</li> <li>2. Relationship with sustainable travel objectives It is counter-productive for a development to be completed to high levels of energy sustainability, only for this to be undermined by a separate requirement for unnecessarily high levels of car parking. To address this, a</li> </ol>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>new Section 4 should be added to draft Policy DC3 to read: “Where developments can demonstrate that non car-based travel modes have been maximised (for example through the implementation of car share schemes, by virtue of proximity to public transport hubs, or through enhanced cyclists’ facilities) a reduced level of onsite car parking will be supported.”</p>	
<p>Pegasus for Donnington New Homes (lpr1948)</p>	<p>Representation on behalf of Donnington New Homes in support of continued allocation of Sandford Park</p> <p>At present, Home Quality Mark standards are voluntary and are not enshrined in Government policy. The Home Quality Mark clarifies the purposes of HQM stating that it 'has been created to serve the UK's Housebuilders...' as opposed to providing a basis from which to create new Policy. As such, at this stage, compliance with HQM standards cannot be required and it is therefore inappropriate to create a new policy requirement based on them. Instead, as suggested in our comments on Policy SP5, this policy should reflect the current and proposed requirements of Part L of the Building Regulations and reference to HQM standards should be deleted.</p> <p>Changes: This policy should reflect the current and proposed requirements of Part L of the Building Regulations and reference to HQM standards should be deleted.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>
<p>Shanly Homes (lpr1977)</p>	<p>Full representation on behalf of Shanly Homes, supporting allocation of site at 72 Purley Rise, is attached to representation on RSA12.</p> <p>This policy requires all new homes to be built to Homes Quality Mark 3 stars. It is recommended that wording be added in to the policy to take account of any possible successor to the Homes Quality Mark.</p> <p>The policy does not provide for any leniency on achieving 3 stars but it is considered that there should be scope for a site-by-site justification if achieving 3 stars is not possible.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

Respondent (with lpr ref)	Response	Council Response
Sovereign Housing Association Ltd (lpr2165)	<p>Whilst SHA support building sustainable homes as a means of addressing the climate emergency and reducing the impact of fuel poverty we have reservations around the application of the Housing Quality Mark (HQM) as a policy requirement. SHA are developing a Homes and Place Standard that is aspirational against the building regulations and believe Local Plans should recognise and support developers who are aspirational. That said, at a regulatory level it is important development follows a single statutory set of standards. The incremental approach set out in Governments Future Homes Standard are likely to exceed the HQA in short order with changes already made to part L of the Building Regulations, coming in to force in 2022, requiring improvements that exceed those previously set out in level 4 of the Code for Sustainable Homes. We suggest making reference to the Future Homes standards in the supporting text and either removing the HQM requirement or and again moving it to the supporting text as something desirable.</p>	<p>Comments noted.</p> <p>The Council is using the powers it has to tackle the issues of climate change and the policy has been revised with new standards.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC4 Environmental Nuisance and Pollution Control

### (Proposed Submission LPR Policy: DM5 Environmental Nuisance and Pollution Control)

Number of responses received: 10

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr153)	Agree with the proposed policy. Perhaps in the light of our earlier comments on DC3, household carbon emissions from heating systems in new developments should also be classed as additional pollution and require avoidance or mitigation?	Comments noted. No change proposed, the energy used to heat the spaces we live and work in is one of the highest contributors to our individual carbon footprints. West Berkshire Council declared a Climate Change Emergency in 2019 and the district's target is to become carbon neutral by 2030. The Local Plan is a key tool to build climate resilience and take action and net zero carbon modelling will inform the next stage of the Local Plan.
Thatcham Town Council (lpr1414)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <ul style="list-style-type: none"> <li>“no harm to the amenity of occupants of neighbouring land and buildings, and future occupants of the development, through an unacceptable increase in pollution, including from light, noise, dust, vibration and/or odour.”</li> </ul>	Comments noted. If there is an existing issue with noise and odour, and if it amounts to a statutory nuisance, this can be pursued through the Council's Environmental Health team. Concerns regarding the increase in noise are noted and the policy will be revised to ensure adverse impacts on health and quality of life arising from noise from new development is mitigated and minimised. The Policy will be amended to include criteria e):

Respondent (with lpr ref)	Response	Council Response
	<p>We have received several comments from residents on Floral Way who are very concerned about the implication of increased noise. This is because properties have been built up to the boundary of Floral Way, in some cases on elevated land, and the noise is already producing an environmental nuisance as windows are unable to be opened adjacent to the road. Residents also complain about vibration from heavy goods vehicles on both the A4 and Floral Way.</p> <p>We note that odour control is a major nuisance to Thatcham residents that live close to the Sewage Works on Lower Way and concern has been expressed regards the capacity of the existing site, its ability to manage greater volumes, and the odour emitted.</p> <p>It is necessary to amend the policy to consider the cumulative effect on existing residents in areas outside the immediate development area.</p>	<p><u>It would not cause noise or vibrations of a level which would disturb areas that are valued for their tranquillity in terms of recreation or amenity. Development proposals that generate significant levels of noise must be accompanied by an assessment to mitigate such effects, having regard to the nature of surrounding uses:</u></p>
Stratfield Mortimer Parish Council (lpr412)	<p>We support this but make the following comment: Emphasis on reduction/avoidance of pollution supported. Policy on lighting - having no lighting policy, or specific type should be determined by an NDP if made. Lighting can have major impact on wildlife and biodiversity, landscape etc.</p> <p>The DC is woolly worded, What does ‘unacceptable’ mean? How is it measured? Who decides? Similarly ‘suitable mitigation measures’ who decides what is suitable, how is it decided what measurable criteria? NDPs should be able to establish whether any pollution levels are deemed acceptable, if so what and whether and what mitigation is acceptable. For example policy on lighting - having no lighting policy, or specific type - should be determined by an NDP if made.</p> <p>The bullet a of the DC should be reworked to become coherent with and supportive of the objective ‘where it does not lead to adverse effects on pollution of the environment’. Define ‘unacceptable’ in quantifiable terms. Include setting of pollution levels appropriate for the neighbourhood and each development site can be determined by an NDP.</p> <p>Need reference to light pollution; this should be included in policies on biodiversity, Design codes, landscape etc. and role of NDPs and local preferences to inform lighting decisions.</p>	<p>Comments noted. Further information will be provided within the supporting text to aid policy interpretation.</p> <p>Agreed, the policy will be expanded to include light pollution as follows –</p> <p><u>All reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife and neighbouring residents. A Lighting Appraisal in accordance with the current guidance from the Institute of Lighting Professionals (ILP) (or similar body), national guidance and British Standards will be required for proposed developments that include outdoor lighting:</u></p>

Respondent (with lpr ref)	Response	Council Response
Shaw-cum-Donnington Parish Council	Support the policy.	Comments noted.
Berkshire, Bedfordshire, Oxfordshire Wildlife Trust (lpr715)	<p>Agree with the proposed policy, but recommend additional content on protecting biodiversity: Lighting within and around development is expected to respect the ecological functionality of movement corridors. Certain species of invertebrate and mammal are highly sensitive to inappropriate lighting. In these circumstances surveys are expected to determine where these movement corridors are and measures put forward that demonstrate how these will be protected and enhanced. Recommended policy wording: <b>“In considering development involving potentially adverse lighting impacts to wildlife the Council will expect surveys to identify movement corridors and ensure that these corridors are protected and enhanced.”</b></p> <p>Nitrogen oxides from both industrial and vehicle emissions can have a significantly detrimental effect on wildlife habitat. Policy wording will be needed to address this. It is recommended this include the following: <b>“Air quality assessments will also be required for development proposals that would be likely to have a significantly adverse impact on biodiversity by generating an increase in air pollution”</b></p> <p>Many wildlife habitats are highly vulnerable to changes in both water quality and water quantity. Policy wording is needed to ensure that appropriate measures (Sustainable Drainage Systems, silt traps and oil interceptors) must be put in place to ensure no change in groundwater flows, surface water run-off rates or water quality so that the water quantity / quality that will affect designated sites and priority habitat and the stream and river network is maintained.</p>	<p>Comments noted.</p> <p>The policy will be expanded to include light pollution and its impact on wildlife as follows –</p> <p><u>All reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid glow, glare and light spillage, intrusion and any adverse impact to wildlife and neighbouring residents. A Lighting Appraisal in accordance with the current guidance from the Institute of Lighting Professionals (ILP) (or similar body), national guidance and British Standards will be required for proposed developments that include outdoor lighting;</u></p> <p>Add the following text to the end of Emerging Draft LPR paragraph 10.36 – <u>‘In considering development involving potentially adverse lighting impacts to wildlife the Council will expect surveys to identify movement corridors and ensure that these corridors are protected and enhanced.’</u></p> <p>These suggestions would be better considered through Emerging Draft LPR Policy DC5 (water quality) and Policy DC7 (air quality).</p>
Natural England (lpr1601)	Due to the prevalence of the North Wessex Downs AONB in West Berkshire, and its impact on the character of the landscape of the Plan area, we advise mention within this policy of the requirement to reduce light pollution. This	Policy SP2 of the Local Plan Review seeks to preserve dark night skies in the AONB. However, it is acknowledged that this DM policy could go further in terms



Respondent (with lpr ref)	Response	Council Response
	will bring the policy in line with para. 180 (c) of the NPPF which states that policies should ' <i>limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation</i> '. The AONB has significant areas of dark skies which should be preserved through planning policies and development control.	of light pollution and so another criterion has been added to the policy to cover this issue as follows -  <u>All reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife and neighbouring residents. A Lighting Appraisal in accordance with the current guidance from the Institute of Lighting Professionals (ILP) (or similar body), national guidance and British Standards will be required for proposed developments that include outdoor lighting;</u>
<b>General consultation bodies</b>		
Theatres Trust (lpr1008)	The Trust welcomes inclusion of part b. of this policy which protects existing facilities from negative impacts from incompatible development, reflecting paragraph 182 of the NPPF. This matter will become particularly critical as Prior Approvals are broadened to a wider range of town centre uses; noise impacts are a criteria to be addressed. Challenges to venues including music venues, nightclubs, pubs and theatres have come forward in boroughs and districts of a similar profile to West Berkshire; a recent Inquiry dismissed an appeal against refusal of residential development adjoining the Corn Exchange in Wallingford (South Oxfordshire) for example.	Comment noted.
The Woodland Trust (lpr1012)	We particularly welcome c) and e), recognising that environmental nuisance should be reduced not only due to the impacts on human wellbeing but also on the natural environment.  We support the principle that development will not be permitted when it is considered that unacceptable effects will be imposed on the health, amenity, or natural environment of the surrounding area, taking into account the cumulative effects of other proposed or existing sources of air pollution in the locality.	Comments noted. The following text will be included within the supporting text of the Proposed Submission LPR Policy DM15: Trees, Woodlands and Hedgerows:  <u>All ammonia-emitting developments, such as intensive livestock units, which fall within 5 kilometres of an ancient woodland site will require an additional assessment to include a detailed Ancient Woodland Nitrogen Impact Assessment of the ancient woodland(s) of concern. This will need to demonstrate that there will be no deterioration as a result of the contributions from the development.</u>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	Ancient woodland is greatly at risk from ammonia pollution. We recommend therefore adding specific requirements that additional screening will be required of all ammonia-emitting developments, such as intensive livestock units, within 5km of an ancient woodland site, with a detailed 'Ancient Woodland Nitrogen Impact Assessment' of the ancient woodland of concern. This will need to demonstrate that there will be no deterioration or impacts as a result of the contributions from this development.	
North Wessex Downs AONB (lpr1613)	Dark skies are a special quality of the AONB yet it features little in our LPAs development plans which often results in schemes being approved without consideration of lighting. Part c. of the policy which refers to the impact of pollution on the environment should including light pollution.	Policy SP2 of the Local Plan Review seeks to preserve dark night skies in the AONB. However, it is acknowledged that this DM policy could go further in terms of light pollution and another criterion has been added to the policy to cover this issue as follows -  <u>All reasonable steps are taken through design, siting and technological solutions to ensure the abatement of obtrusive light to avoid sky glow, glare and light spillage, intrusion and any adverse impact to wildlife and neighbouring residents. A Lighting Appraisal in accordance with the current guidance from the Institute of Lighting Professionals (ILP) (or similar body), national guidance and British Standards will be required for proposed developments that include outdoor lighting;</u>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr586)	Agree with the proposed policy.	Comments noted.
<b>Landowners, site promoters and developers</b>		

## APPENDIX 6

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

## Emerging Draft LPR Policy: DC5 Water Quality

## (Proposed Submission LPR Policy: DM6 Water Quality)

Number of responses received: 9

Respondent	Response	Council Response
<b>Internal</b>		
West Berkshire Council Ecologist (lpr1695)	Policy neither supported nor not supported.  Does a point around water quality distinctness protect need to be added, relating if an area is naturally alkali or acidic?	Comment noted, paragraph 174 of the NPPF highlights that planning policies should ‘help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans’. As such a comprehensive approach to water quality has been taken within this policy rather than adding additional complexity.
<b>Statutory consultees</b>		
Natural England (lpr1600)	Policy neither supported nor not supported.  <b>1st bullet point</b> - Water Framework Directive (WFD) ‘Good’ status is not adequate to meet Favourable condition for the River Kennet SSSI and River Lambourn SSSI (and SAC) which have conservation objective targets for water quality. The policy as it stands is setting the bar too low. We suggest it be reworded to “...that it will prevent future attainment of Favourable condition for SSSI rivers, waterbodies or wetlands (as required by Wildlife and Countryside Act 1981 (as amended)), or ‘good status’ for other waterbodies under the Water Environment”.	Suggested wording accepted criteria a) and b) will be amended to:  <i><u>‘a) that it causes no deterioration in the quality of waterbodies, surface and groundwater, nor that it will prevent future attainment of Favourable condition for Sites of Special Scientific Interest (SSSI) rivers, waterbodies or wetlands (as required by Wildlife and Countryside Act 1981 (as amended), or ‘good status’ for other waterbodies under the Water Environment (Water Framework Directive)</u></i>

Respondent	Response	Council Response
	<p><b>2nd bullet point</b> – As above, we advise rewording to have a SSSI objective – “enhancements where waterbodies are not achieving Favourable condition (for SSSI’s) or, good ecological or chemical status for non-SSSI waterbodies”.</p> <p>In addition, we would welcome a watercourse specific policy, to include dedicated protection and enhancement for the designated Kennet and Lambourn rivers, and bring together elements such a biodiversity, green infrastructure, water quality and climate change . This will be able to be applied to the above site allocations which have the potential to impact on the rivers.</p> <p>We would include within this policy the requirement for closer inspection within 500m of SSSI waterbodies of the risks to water quality, (and achievement of SSSI water quality targets) from the small scale sewage treatment plants where developments are not connecting to the sewer network. At the nearby Habitats Sites, a Habitats Regulations Assessment is likely to be required under the precautionary principle.</p> <p>The Environment Agency (EA) specifies a minimum width of undeveloped buffer zone of 10m for main rivers and 5m for ordinary watercourses. We support this to be included within Policy, but would advise that for ecological purposes, larger buffers may often be required. This may be to help mitigate recreational impacts from a large development, particularly where the watercourses are designated SSSIs.</p> <p>Some Local Authorities go further than the EA’s minimum buffer width. Basingstoke and Deane BC’s <a href="#">Landscape, Biodiversity and Trees SPD</a> gives clear guidance on buffer sizes. Box B6 specifies a minimum buffer of 20m on both sides of the channel for main rivers, and 5m for other watercourses and waterbodies. Natural England would be very supportive of this approach if it were to be taken in West Berkshire. The new policy will need to protect water quality, but also protect these buffer zones and riparian corridors. Historic development in West Berkshire has enabled housing and gardens right up to the river bank, which has been detrimental for both ecology and flood risk, and for future positive management.</p>	<p><i>(England and Wales) Regulations 2017 and Groundwater (Water Framework Directive) (England) Direction 2016 or any subsequent amendment;</i></p> <p><i>b) that it contributes positively to the water environment and its ecology and delivers enhancements where waterbodies are not achieving ‘favourable condition’ for SSSI’s or, ‘good’ ecological or chemical status for non-SSSI waterbodies;’</i></p> <p>Comment noted, a new criterion will be included specific to the River Kennet and River Lambourn which reads:</p> <p><i>g. how the proposal will support improving the status and overall health of the River Kennet and River Lambourn</i></p> <p>The supporting text will expand upon the criteria to include elements relating to biodiversity, green infrastructure, water quality and climate change. The supporting text at paragraph 11.60 will read:</p> <p><i>Proposals which contribute to the protection and enhancement of the River Kennet and River Lambourn’s overall health and improved status under the Water Framework Directive will be supported. Well-designed development will assist the conservation and enhancement of the biodiversity, landscape and recreational value of the watercourses whilst building climate resilience. Applicants must also have specific regard to Policy SP10 Green Infrastructure.</i></p> <p>Policy SP10 Green Infrastructure will be expanded to make it clear that the policy also covers ‘blue spaces’. The policy will draw together biodiversity, green infrastructure and blue space and strengthen climate resilience within West Berkshire.</p>

Respondent	Response	Council Response
		<p>An additional criterion will be added to the Policy to include a buffer as per the recommendations contained within the West Berkshire Strategic Flood Risk Assessment (2022). Criterion will read:</p> <p><i><u>f. Proposals for built development will be required to be at least ten metres away from the top of the bank of the nearest watercourse or main river.</u></i></p>
Environment Agency (lpr1663)	<p>Policy neither supported nor not supported.</p> <p>We welcome the policy's reference to meeting the requirements of the Water Framework Directive, and protection and enhancement of classified waterbodies as identified in the Thames River Basin Management Plan. As noted above, the River Kennet and River Lambourn are Sites of Special Scientific Interest (SSSIs), with the Lambourn being additionally designated as a Special Area of Conservation (SAC). These designations are required to meet Common Standards Monitoring (CSM), which sets additional, higher water quality standards than under the Water Framework Directive.</p> <p>Given the importance of these watercourses in West Berkshire, the above wording should be added to the policy, or the local plan would be found unsound in the future. Without this, the local plan not safeguard the enhancement of the natural and local environment by:</p> <p>Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution in accordance with Paragraph 170 of the NPPF.</p> <p>The Water Cycle Study (WCS) states that 3 Waste Water Treatment Works (WWTWs) are predicted to, or are already exceeding their flow permits during the plan period. These are Chieveley, Hungerford and Newbury. It also states that many WWTWs (Thames Water highlighted East Shefford,</p>	<p>Comments noted.</p> <p>Wording as suggested by Natural England is accepted, criteria a) and b) will be amended to:</p> <p><i>a. that it causes no deterioration in the quality of waterbodies, surface and groundwater, nor that it will prevent future attainment of <u>Favourable condition for Sites of Special Scientific Interest (SSSI) rivers, waterbodies or wetlands (as required by Wildlife and Countryside Act 1981 (as amended), or 'good status' for other waterbodies under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and Groundwater (Water Framework Directive) (England) Direction 2016 or any subsequent amendment;</u></i></p> <p><i>b) that it contributes positively to the water environment and its ecology and delivers enhancements where waterbodies are not achieving <u>'favourable condition' for SSSI's or, 'good' ecological or chemical status for non-SSSI waterbodies;</u></i></p> <p>This has been inserted into Emerging Draft LPR Policy DM6 Water Resources and Waste Water.</p>

Respondent	Response	Council Response
	<p>Leckhampstead, Silchester &amp; Washwater) would require upgrades during the plan period, and West Berkshire Council should consider the time taken to undertake these upgrades when phasing development. It is important that this policy is strengthened to reflect the recommendations in the WCS, otherwise the infrastructure would not support the quantum of development and the plan would be found unsound in the future.</p> <p>The policy in its current form does not do enough to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution in accordance with Paragraph 170 of the NPPF.</p>	<p>The Water Cycle Study (Phase 2) (2021) was completed following the Regulation 18 Local Plan Review Consultation and forms part of the Local Plan evidence base. It is considered that wastewater issues would be suited to be covered in Emerging Draft LPR Policy DC6 Water Resources which is to be renamed to include waste water.</p> <p>Noted, an additional criterion will be added to Proposed Submission LPR Policy DM7 Water Resources and Wastewater to ensure new proposals do not adversely impact on the water quality, ecological value or drainage function of water bodies in the District. This criteria will read:</p> <p><i><u>f. It will not adversely impact the water quality, ecological value or drainage function of water bodies in the District, including any adverse impacts on Source Protection Zones (SPZ)</u></i></p>
Stratfield Mortimer Parish Council (lpr413)	Policy is supported.	Comment noted.
Shaw-cum-Donnington Parish Council (lpr224)	Policy is supported.	Comment noted.
Hungerford Town Council (lpr154)	<p>Policy is supported.</p> <p>Rivers Kennet and Dun provide important natural habitats and need protection</p>	Comment noted.
<b>General consultation bodies</b>		

Respondent	Response	Council Response
None		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr587)	We strongly support this policy, in particular the inclusion of infrastructure development projects such as bridges and earthworks.	Comment noted.
Ian Parsons (lpr836)	Policy supported.  Encouraging, through some financial benefit perhaps (reduced Council Tax for two years) households which replace oil/gas heating with ground source heating. If the new heat source were supplied by a council owned company - even better.	Comment noted, renewable energy technologies are considered in Emerging Draft LPR Policy DC3 Building Sustainable Homes and Businesses. The Local Plan is not the mechanism to introduce financial incentives, however the Council are committed to reaching the target of carbon neutrality by 2030 and the Environment Strategy outlines the steps the Council intends to take to achieve this with an accompanying Delivery Plan to support this.
Sam Coppinger (lpr308)	Policy is supported.	Comment noted.
<b>Landowners, site promoters and developers</b>		
None		

**APPENDIX 7****Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC6 Water Resources****(Proposed Submission LPR Policy: DM7 Water Resources and Wastewater)**

Number of responses received: 11

<b>Respondent</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr158)	Policy is supported.	Comment noted.
Tilehurst Parish Council (lpr1984)	<p>Policy neither supported nor not supported.</p> <p>There is little or no mention of utilities on new developments. For larger development, consideration should be given to adoption of models used successfully elsewhere, whereby a single, specially covered off-road utilities trench is used for water, sewerage, power and telecoms, making ease of access without disrupting road traffic.</p> <p>For larger development, consideration should be given to adoption of models used successfully elsewhere, whereby a single, specially covered off-road utilities trench is used for water, sewerage, power and telecoms, making ease of access without disrupting road traffic.</p>	<p>This policy relates to the wise use of water and water conservation. The point regarding utilities on new developments is a matter for the design and construction of the development. However, this level of detail would apply at the planning application stage.</p>



Respondent	Response	Council Response
Shaw-cum-Donnington Parish Council (lpr225)	<p>We support the policy.</p> <p>We are concerned at how the aim meets BREEAM excellent for waste consumption will be enforced without changes to building regulations.</p> <p>10.44 It is stated that the council has the option to set additional technical requirements but this must have limits that are not referred to in the text. However we support the objective.</p>	<p>Comments noted.</p> <p>The option has been exercised in the policy as West Berkshire lies within a ‘water stressed’ region.</p>
Stratfield Mortimer Parish Council (lpr414)	<p>It is good to see policies that address this important issue but we have some reservations:</p> <p>The concept of water-neutral is not explained, as far as can be seen, surely it does not mean that every development should not require any net increase in water consumption. Without the explanation it is difficult to tell if the policy is appropriate.</p> <p>Even so there is a blatant get-out clause which says that viability/feasibility can override the core policy. Surely if the plan is serious about water-neutrality it should not allow such an easy way out but insist on the standards it wants or not allow the development to proceed.</p> <p>Explain water-neutrality and remove the get-out about feasibility/viability.</p>	<p>The primary aim of the water neutrality concept is to reduce demand for water from households and other buildings in new development by means of water efficiency and water recycling to minimise use as the policy states. Text will be added to the supporting text to provide an explanation of ‘water neutrality’.</p> <p>The policy requires demonstration of the grounds for feasibility and viability to the satisfaction of the Council. It does not “override” the core policy.</p>
Thames Water Utilities Ltd (lpr1741)	<p>Policy neither supported nor not supported. Suggestions made.</p> <p>We support Policy DC6 and supporting paragraphs as they are largely in line with our previous representations.</p> <p>We consider it would be clearer and more accurate to rename the Policy: “Water resources <b><u>and wastewater</u></b>”</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p>	<p>Comments noted.</p> <p>Accept the renaming of the Policy as suggested; Water resources <u>and wastewater</u>.</p>

Respondent	Response	Council Response
	<p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “<i>Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....</i>”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “<i>Adequate water and wastewater infrastructure is needed to support sustainable development</i>” (Paragraph: 001, Reference ID: 34-001- 20140306).</p>	

Respondent	Response	Council Response
	<p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.</p> <p>We therefore support Policy DC6 and supporting paragraphs in this respect.</p> <p><b>Water Efficiency/Climate Change</b></p> <p>The Environment Agency has designated the Thames Water region to be “<i>seriously water stressed</i>” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p>	

Respondent	Response	Council Response
	<p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a></p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text:  <b><i>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</i></b></p>	<p>Comments noted, the Council will amalgamate some of the suggested wording into the policy although considers the wording regarding water usage is clearer in the drafted policy. The wording will be amended to read:</p> <p><u><i>Development will be required to be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</i></u></p>
Environment Agency (lpr1664)	<p>We welcome that this policy correctly identifies the need to use the tighter water efficiency target of 110l/p/d for new developments. West Berkshire sits within a water stressed catchment, and therefore every effort should be made to reduce water usage. We also encourage the incorporation of water-neutrality into the policy.</p> <p><b>Contaminated Land</b>  From the list of polices provided, there doesn't seem to be any policy about contaminated land. There should be a policy requiring robust evidence regarding investigation and remedial measures to prevent discharge to groundwater aquifers through land affected by contamination. This should</p>	<p>Comments noted.</p> <p>Policy DC4 Environmental nuisance and pollution control in the emerging draft LPR considers contaminated land. The policy will be reviewed to ensure that it meets the</p>

Respondent	Response	Council Response
	<p>link with or be included in the above policy about pollution prevention and water quality.</p> <p>We recommend including the following text on page 148 to protect groundwater quality:  <i>Developments should allow sufficient shallow drainage areas if infiltration is to be used. The use of deep soakaways for infiltration (e.g. boreholes) are not a recognised SUDS solution and may be refused a permit. This is to protect groundwater quality.</i></p> <p>By including the above issues in the local plan policy this will be consistent with paragraphs 170 and 178 of the NPPF.</p>	<p>requirements set out in the National Planning Policy Framework and accompanying guidance.</p> <p>The suggested text is added to Emerging Draft LPR Policy DM6, paragraph 11.62 of the Supporting Text in the first bullet point.</p>
<b>General consultation bodies</b>		
West Berkshire Green Exchange (lpr1560)	<p>Policy neither supported nor not supported.</p> <p>The Environment Agency informs us that water scarcity will be an increasing problem. Therefore, in the planning of housing development, water supplies need better consideration and techniques such as rainwater harvesting and grey water use should be implemented. We support the statement in paragraph 5b.</p>	Comments noted.
<b>Other stakeholders</b>		
Cllr Tony Vickers (lpr589)	<p>Policy is supported.</p> <p>Conservation of water resources is very important, as is the need to protect foul sewage treatment works from over-loading with surface water.</p>	Comments noted.
Sam Coppinger (lpr309)	Policy is supported.	Comment noted.
Camilla Kingham (lpr2155)	Policy neither supported nor not supported.	Note. Amend first sentence of Emerging Draft LPR paragraph 11.66 as follows – <i>‘Most of the water is abstracted from groundwater aquifers supported by some</i>

Respondent	Response	Council Response
	<p>In the supporting text to Policy SP6 Water Resources, you wrote "Most of the water is abstracted from groundwater aquifers supported by some river extraction, notably the Rivers Kennet, Lambourn and Pang." Please remember that Thames Water no longer abstracts from the Pang or its chalk aquifers having ceased abstraction in Compton some years ago. Whilst Thames Water has a drought permit to abstract in Pangbourne (<a href="https://www.thameswater.co.uk/media-library/home/about-us/regulation/drought-plan/appendices/drought-plan-appendix-b.pdf">https://www.thameswater.co.uk/media-library/home/about-us/regulation/drought-plan/appendices/drought-plan-appendix-b.pdf</a>) that is only for drought reasons. In no account must any developments cause day-to-day abstraction from the Pang, within the AONB, to be restarted.</p>	<p><i>river extraction, notably the Rivers Kennet and Lambourn and Pang.'</i></p>
<b>Landowners, site promoters and developers</b>		
<p>Lichfields for North East Thatcham Consortium (lpr2408)</p>	<p>We note the policy requires all residential developments to meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day. Although this level of water consumption is an optional standard, the requirement is justified on the back of government guidance (unreferenced) that the Council has the option to set additional technical requirements in the Local Plan on exceeding the minimum standard required by the Building Regulations relating to water efficiency.</p> <p><b>Water Cycle Study Phase 1 – Scoping report</b></p> <p>This study assesses potential issues relating to future development on water supply, wastewater collection and treatment and water quality. The findings are presented on a site-by-site basis in Appendix A (Site Tracker). We note that there is a need to upgrade water treatment works to treat water flowing to NET as well as sewage treatment works that would need to be upgraded to treat sewage from NET. No indication is given as to whether there are plans to commit funding to upgrade these facilities in the AMP7 (2020-2025) period. This requires further investigation and will require consideration in any future viability works undertaken by the Council.</p>	<p>Comments noted, The Phase 1 Scoping Study provided an initial assessments of water resources and supply, wastewater network and treatment capacity, water quality, flood risk and odour for potential allocations. Following on from this a Phase 2 Study has been completed and updates each assessment based on updated growth forecasts. Potential allocation sites and wastewater treatment works likely to serve growth in the area were identified and were assessed to understand the additional wastewater flow resulting from the planned growth. Thames Water were consulted as part of this process and have identified where further modelling and/or upgrades to the network would be required in order to serve those sites.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC7 Air Quality****(Proposed Submission LPR Policy: DM8 Air Quality)**

Number of responses received: 7

<b>Respondent</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr155)	Support for the policy.	Comments noted.
Shaw cum Donnington Parish Council (lpr227)	Support for the policy.	Comments noted.
Stratfield Mortimer Parish Council (lpr415)	Support for the policy.	Comments noted.

Respondent	Response	Council Response
Thatcham Town Council (lpr1415)	<p>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17. "Development will be permitted where it does not lead to adverse effects on health or the environment either from the development itself or cumulatively." We are very concerned that the AQMA on the A4 is not being regularly monitored, and that insufficient consideration is given to the emissions in the local environment. This is particularly important due to the vicinity of a primary school close to the A4 in Thatcham. We note that West Berkshire recognise Thatcham as an Air Quality Management Area and that the most recently referred to measurements on the website are from 2016 which states that "the annual mean NO2 concentration was exceeded at 2 sites within the Thatcham AQMA". We do not agree that the Sustainability Assessment had demonstrated evidence that the new Thatcham NE development passes the test outlined in (a), (b), or (c) as the cumulative effect to traffic on the A4 may lead to adverse health. It is clearly not appropriate to perform an AQA whilst vehicle traffic levels are suppressed during Covid, so we seek guidance on the approach that has been taken to monitor NOx and particulate levels during peak AM periods when children are more likely to be exposed to heavy traffic flow. For reasons outlined earlier we do not believe that a mitigation approach of diverting A4 traffic onto residential roads (Floral Way and then Bowling Green Road) would be credible or sustainable. Within Thatcham there is a recurring issue related to odour nuisance from the sewage works at Lower Way. We require that the policy reflect odour nuisance as a part of policy. Therefore, it is essential that evidence for Thatcham NE is provided that: Demonstrates the AQMA monitoring is recent and that future growth will not adversely affect air quality during any period from 2020 - 2037 within the Local Plan. It is essential that the policy reflects odour nuisance, and how this will be assessed.</p>	<p>Comments respecting the efficacy of monitoring methodology are noted, however the Council would like to direct the respondent to the West Berkshire Local Air Quality Management Annual Status Report 2021 which provides an overview of air quality in West Berkshire during 2020 to meet Part IV of the Environment Act (1995) and the relevant Policy and Technical Guidance documents. This Report is an annual report and previous versions are available on the Public Protection Partnership's website. This document sets out air quality monitoring data from 2016 to 2020 and demonstrates that the Thatcham AQMA is being regularly monitored and contains measures to improve air quality within the area including: Further development of A4 cycle route; Optimisation of traffic signal timings on A4; and On-street electric vehicle charge points.</p> <p>The LPR should be read as a whole and our approach with regard to odour is included in policies DM4 Environmental nuisance and pollution control, and DM30 Residential Amenity. The Council agrees that decisions should be based on accurate and up to date information and therefore the Council is updating and extending its air quality evidence base in regards to development proposals resulting from the LPR and in combination with other relevant strategies and plans.</p>
<b>General consultation bodies</b>		
None		
<b>Other stakeholders</b>		
Sam Coppinger (lpr310)	Support for the policy.	Support for the policy is noted.



Respondent	Response	Council Response
Alastair Jarman (lpr223)	<p>Support for the policy.</p> <p>I strongly believe in element e: it does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people; This aspiration is only any use if it is applied. There is now overwhelming evidence of the damage caused by fine particulate matter in sensitive receptors. It is responsible for over 30,000 deaths in the UK annually as well as non-lethal health issues which affect quality of life. "The World Health Organization acknowledges that current evidence suggests no safe level for PM2.5." Public Health England 11 th March 2019 <a href="https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review?fbclid=IwAR3pymcshBLAF0HWJAV7BXkOhIzJJolL8QwtuHKvG3fKdH8Tk4h4uYYWHjuY">https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review?fbclid=IwAR3pymcshBLAF0HWJAV7BXkOhIzJJolL8QwtuHKvG3fKdH8Tk4h4uYYWHjuY</a>. Now is our opportunity to create a clean air generation of children, by implementing interventions in a coordinated way. By making new developments clean by design we can create a better environment for everyone, especially our children. I note that in some environmental statements, PM created during construction phase is described as temporary and reversible, I disagree with how this is defined and considered. For example, if a child is exposed over a twenty-year construction phase to fine particulate matter, that child starting a school at early years could be exposed over their whole primary and secondary educational life through to sixth form. Once the construction is completed, the particulate matter produced by the construction phase will indeed cease, but importantly the effect on the child's lungs will be permanent.</p>	Comments noted.
Councillor Tony Vickers (lpr 593)	We support this policy. However we wish to see supporting text expanding on explaining the value of green infrastructure (e.g. green walls, certain tree species) which significantly mitigate the harm caused by particulates.	<p>Comments noted.</p> <p>Agree, supporting text will be expanded to include the following text:</p> <p><u>11.76. ... or well-designed green infrastructure can offer significant physical health benefits and equality via improved air quality, if planned and designed correctly, that is, with the right vegetation in the right place, by reducing the public's exposure to pollutants.</u></p>

Respondent	Response	Council Response
		The text will also be expanded to direct readers to other policies in the Local Plan which have regard to air quality or include mitigation which can improve air quality, such as SP10 Green Infrastructure.
<b>Landowners, site promoters and developers</b>		
None		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC8 Conservation Areas

### (Proposed Submission LPR Policy: DM9 Conservation Areas)

Number of responses received: 11

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr775)	Supports the policy	Comments noted
<b>Statutory consultees</b>		
Hungerford Town Council (lpr156)	We strongly support this policy - CAs in Hungerford town centre and Eddington	Comments noted
Lambourn Neighbourhood Development Plan Steering Group (lpr1711)	The Lambourn NDP is mindful of the wealth of heritage assets in the Parish of Lambourn. The Steering Group will work closely with WBC to conserve and protect this legacy.	Comments noted
Shaw cum Donnington Parish Council (lpr228)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr416)	Supports the policy	Comments noted

Respondent (with lpr ref)	Response	Council Response
Historic England (lpr1584)	<p>Typographical: 'criteria'.</p> <p>We support criteria i-viii. However, a key component appears to be missing: what makes a particular conservation area special. This goes to the heart of conservation areas and the legislation under which they are created and managed. Normally, conservation area appraisals illuminate what is special about a conservation area. The lack of reference to specialness in this policy is perhaps related to another problem: the lack of conservation area appraisals. We discuss this in further depth below, but in terms of the policy wording, we would recommend that suitable references are added to refer to both specialness, and conservation area appraisals, in the main part of the policy text. The importance of specialness is recognised in the supporting text, though reference to the Listed Buildings and Conservation Areas Act (10.54): A Conservation Area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance (Listed Building and Conservation Areas Act, 1990). The text continues (10.55) The special character and appearance of a Conservation Area can be derived from many different aspects including its physical features, spaces, landscape, views, the uses of an area, and the relationship between these elements. Other aspects of character may be more intangible perceptions of a place, such as historical or cultural associations with a place or building. Others may be relatively ephemeral or transitory, such as the smells and sounds associated with specific activities, which may occur only at certain times of the day or year. The above commentary highlights why it is important to clearly define what is special about a particular conservation area. Out of 53 conservation areas, only two have appraisals. This leads to uncertainty for applicants. In turn, this makes assessments of significance less likely to be adequate, placing a greater resource burden upon the council's conservation officers in the day-to-day development management of the area. Additionally, the absence of conservation area appraisals makes allocating sites within conservation areas or their settings more challenging, as, again, what is special about the conservation area needs to be determined without reference to an appraisal. The supporting text tacitly acknowledges this deficiency (10.56) in identifying work that is on-going, with the West Berks Heritage Forum and communities, to review existing conservation areas and adopt new ones. We welcome this work.</p>	<p>Comments noted.</p> <p>Typographical error will be corrected Add '<a href="#">special</a>' before 'character' in first and second paragraphs of policy</p> <p>The policy makes clear that proposals for development will be determined in accordance with Policy SP9. Policy SP9 already sets out the proposals should be informed by Conservation Area Appraisals (CAA).</p> <p>The Council recognises the importance of CAAs and is undertaking an active programme of CAAs as part of its strategy for the conservation and enjoyment of the historic environment. In 2019 funding was obtained to establish a prioritisation methodology to identify those Conservation Areas (CAs) within West Berkshire that are under the greatest level of pressure from development and which have been subject to the greatest level of change. A priority list of all CAs was drawn up which forms the basis for a proposed phased programme of reviews up to July 2026, subject to resources. Phase 1, which sets out the top ten CAs most in need of review, includes the larger and more complex areas. The CAA for Newbury town centre is due to be complete in 2023 and CAAs for Thatcham and Hungerford will follow. Monitoring of the CAA review programme will be undertaken through the Council's Annual Monitoring report (AMR).</p> <p>Amend para 10.55 as follows – 'The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the District's 53 Conservation Areas. As part of this duty <a href="#">and as part of its strategy to maximise opportunities for the conservation and enjoyment of the</a></p>

Respondent (with lpr ref)	Response	Council Response
	<p>However, our view is that the plan should go further. It should set out defined goals in relation to conservation area appraisals that are clearly measurable. It is clear that conservation area appraisals are a component of the evidence on which the plan should be based. Their absence marks a flaw both in the plan's evidence base, and that an active programme of conservation area appraisals is part of the plan's obligation to set out a positive strategy for the conservation and enjoyment of the historic environment. Each of these aspects render the plan inconsistent with national policy, and the former also leaves it unjustified, and it is therefore considered unsound. To remedy this, we recommend the following. We recognise that the Council may not have the time or resources available to appraise the 51 outstanding conservation areas prior to plan submission (although, with dedicated resource, this level of output has been achieved elsewhere). However, we do not think it unreasonable for the Council to commit to at least five conservation area appraisals per year. With appropriate prioritisation of conservation areas more affected by development proposed in the plan, this rate would likely allow for those areas to have an appraisal adopted or at least drafted by the time the plan is submitted.</p>	<p><a href="#">historic environment</a> the Council is undertaking a project <a href="#">phased programme of Conservation Area Appraisals (CAAs)</a>, in partnership with the West Berkshire Heritage Forum <del>to encourage community involvement in their review and adoption of further Conservation Area Appraisals.</del> <a href="#">As well as helping to define what is special about a particular Conservation Area,</a> The project will provide local communities with an understanding of how and why Conservation Area status is appraised, designated, and applied in future development and conservation management decisions....'</p>
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr91)	<p>The means to assess the effect of a proposed development in a Conservation Area on its character, appearance, and significance should be provided by its Conservation Area Assessment.</p> <p>10.56 The Heritage Forum looks forward to being involved in CAAs via the Working Group. It is essential that the Local Plan includes target dates, broadly as agreed early in 2020, and sufficient resource to both prepare the CAAs and manage the process. Voluntary contributions will not cover either of these sufficiently, and a contribution will be needed from Planning Policy.</p> <p>10.60 We should not be afraid of approving repurposing of a heritage asset which provides that asset with viable long-term support, so long as its character and significance are conserved.</p>	<p>Comments noted</p> <p>The Council welcomes the involvement of the Heritage Forum and recognises the importance of CAAs as part of its strategy for the conservation and enjoyment of the historic environment. As the Heritage Forum has noted, a priority list of all CAs was drawn up which forms the basis for a proposed phased programme of reviews up to July 2026, subject to resources. Phase 1, which sets out the top ten CAs most in need of review, includes the larger and more complex areas.</p> <p>As a result of Council funding, the CAA for Newbury town centre is due to be complete by 2023 and CAAs for Thatcham and Hungerford will follow.</p>

Respondent (with lpr ref)	Response	Council Response
		Monitoring of the CAA review programme will be undertaken through the Council's Annual Monitoring report (AMR).
<b>Other stakeholders</b>		
Sam Coppinger (lpr311)	Supports the policy	Comments noted
Ian Parsons (lpr838)	Supports the policy. It would be good if areas that do have older buildings but which don't have Conservation status because of modern infill were to be considered anew, perhaps under some slightly different designation.	
Councillor Tony Vickers (lpr594)	We support this policy. However we would like to ensure that funding (CIL?) is available from all major developments in CAs or affecting the setting of a CA to help carry out CA assessments. This could be in a new paragraph of supporting text. See above. We are unsure what might be appropriate	Comments noted.  The Council recognises the importance of CAAs as part of its strategy for the conservation and enjoyment of the historic environment however CAAs are not able to be funded through strategic CIL funding.
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1791)	Paragraph 16(f) of the NPPF confirms plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Policy SP9 relates to the historic environment and provides an over-arching framework to consider development proposals. Proposed policies DC8, DC9, DC10, DC11, DC12 and DC13 do not serve a clear purpose and they run contrary to the NPPF at Section 16. It must not be the role of a development plan (as Policy DC8 does within criteria i to viii) to define and restrict new development affecting heritage assets. Instead, the NPPF is clear that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance. The understanding of significance, through	Comments noted.  The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. It is noted that Historic England agrees with this approach.  The policy makes clear that proposals for development will be determined in accordance with Policy SP9. Policy SP9 makes clear that the historic character, sense of place, environmental quality and local distinctiveness will be sustained and enhanced through new development.

Respondent (with lpr ref)	Response	Council Response
	<p>the heritage statement (a requirement under Policy SP9), will itself determine how any heritage asset should be conserved in a manner appropriate to their significance. It is therefore unnecessary for a development management policy to define what may or may not be appropriate when considering change to a heritage asset and its significance.</p> <p>The reading of the criteria under Policy DC8 can only be interpreted in requiring only the preservation of character or appearance in the context of a conservation area. These leave no opportunity to (1) consider the desirability of new development making a positive contribution to local character and distinctiveness; and (2) looking for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.</p> <p>In terms of the second limb of Policy DC8 concerning demolition, it should not necessarily follow that demolition of an element which makes a positive contribution to the significance of a conservation should be treated as substantial harm, as criteria (i) to (ii) infer. A balanced judgement must still be undertaken to identify the level of harm relative to the significance of the asset as a whole.</p> <p>The test under criterion (i) that all possible measures to sustain an existing use or find an alternative use have been explored and failed is ambiguous and provides no clear basis upon which such a test will be properly judged. Does this require marketing and for how long?</p> <p>The test under criterion (i) that “redevelopment bring substantial benefits goes beyond the basis outlined in Section 16 of the NPPF, which does not prescribe (as a starting point) the level of benefit sufficient to outweigh harm. The justification set out in criterion (iii), that demolition should be to remove an element that is unsightly or otherwise inappropriate, is overly restrictive. Removal of elements that offer no more than a neutral contribution to the significance any asset should not require further justification, all other things being equal.</p>	<p>This DM policy also seeks opportunities for development to enhance the character or appearance of a CA. The first paragraph of the policy states “Proposals for development in a Conservation Area, or for development that affects its setting or important views into, out of, across or through the area, will assess and clearly demonstrate how the character, appearance and significance of the Conservation Area will be preserved <b>or</b> enhanced”.</p> <p>It is agreed that criterion (i) of the Emerging Draft LPR is not necessary and could be removed.</p> <p>The second limb of the policy already refers to the demolition of the buildings, walls, structures that make a positive contribution to the character of the CA, therefore criterion (iii) will also be removed.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC9 Listed Buildings

### (Proposed Submission LPR Policy: DM10 Listed Buildings)

Number of responses received: 10

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr776)	Supports the policy	Comments noted
<b>Statutory consultees</b>		
Hungerford Town Council (lpr157)	Supports the policy	Comments noted
Lambourn Neighbourhood Development Plan Steering Group (lpr1712)	The Lambourn NDP is mindful of the wealth of heritage assets in the Parish of Lambourn. The Steering Group will work closely with WBC to conserve and protect this legacy.	Comments noted
Shaw cum Donnington Parish Council (lpr229)	We support the policy	Comments noted



Respondent (with lpr ref)	Response	Council Response
Stratfield Mortimer Parish Council (lpr417)	We support this with reservations: While it is good to see a policy that addresses this issue, the wording is very vague and does not allow the success of this policy to be valued. In particular, simply saying 'development must have regard to' could be satisfied by a statement that a very small element has been taken into consideration. Strengthen the wording and make clear what is and is not acceptable.	Comments noted. The policy makes clear that proposals for development will be determined in accordance with Policy SP9. SP9 sets out the principle that development which would lead to substantial harm to, or loss of, the significance of a listed buildings or its setting will not be permitted. It also makes clear that development which would lead to less than substantial harm to the significance of a listed building or its setting will not be permitted, unless the harm is outweighed by the public benefits of the proposal. This DM policy sets out more detailed criteria that will be taken into account when determining individual proposals for development.
Historic England (lpr1585)	We welcome and support this policy. We consider the level of detail it includes to be appropriate and clear.	Comments noted
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr99)	Supports the policy	Comments noted
<b>Other stakeholders</b>		
David Hill (lpr718)	Policies surrounding Listed Buildings are out of date and often not conducive to good practice surrounding energy efficiency. The policy needs to be updated to be practical and reflect modern building standards and practices. Alterations to Listed buildings to facilitate improved energy efficiency should be approved provided that they can demonstrate that these changes will not substantially alter the appearance and character of a listed building.	Comments noted. The Council agrees proposals for energy saving measures should be designed with the knowledge and understanding of the building's significance and supports a holistic 'whole building' approach. This, as set out in the supporting text to the policy, helps to ensure that energy efficient measures are suitable, robust, well-integrated, properly coordinated and sustainable.
Councillor Tony Vickers (lpr595)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		

Respondent (with lpr ref)	Response	Council Response
Fowler Architecture and Planning (lpr1792)	<p>Paragraph 16(f) of the NPPF confirms plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Policy SP9 relates to the historic environment and provides an over-arching framework to consider development proposals. Proposed policies DC8, DC9, DC10, DC11, DC12 and DC13 do not serve a clear purpose and they run contrary to the NPPF at Section 16.</p> <p>It must not be the role of a development plan (as Policy DC9 does within 2nd section criteria i to viii) to define and restrict new development works affecting heritage assets. Instead, the NPPF is clear that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance. It is correct that harm to the significance of a listed building should be avoided, and harm to the significance of a heritage asset should require justification. It is not, however, reasonable to set out a policy seeking refusal of any applications that result in such harm. The NPPF sets out a clear decision making process for the weighing of harm to heritage assets against the benefits of a given proposal. The third paragraph of this policy, together with its three criteria, run in conflict with the NPPF. The understanding of significance, through the heritage statement (a requirement under Policy SP9), will itself determine how any heritage asset should be conserved in a manner appropriate to their significance. It is therefore unnecessary for a development management policy to define what may or may not be appropriate when considering change to a heritage asset and its significance.</p>	<p>Comments noted. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. It is noted that Historic England agrees with this approach.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC10 Non designated heritage assets

### (Proposed Submission LPR Policy: DM11 Non designated heritage assets)

Number of responses received: 13

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr777)	Supports the policy	Comments noted
<b>Statutory consultees</b>		
Hungerford Town Council (lpr159)	Supports the policy	Comments noted
Lambourn Neighbourhood Development Plan Steering Group (lpr1713)	The Lambourn NDP is mindful of the wealth of heritage assets in the Parish of Lambourn. The Steering Group will work closely with WBC to conserve and protect this legacy.	Comments noted
Shaw cum Donnington Parish Council (lpr230)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr418)	We support this with reservations: While it is good to see a policy that addresses this issue, the wording is very vague and does not allow the success of this policy to be valued. In particular, simply saying 'development must have regard to' could be satisfied by a statement that a	Comments noted. The policy makes clear that proposals for development will be determined in accordance with Policy SP9. This DM policy sets out more detailed criteria

Respondent (with lpr ref)	Response	Council Response
	very small element has been taken into consideration. Strengthen the wording and make clear what is and is not acceptable.	that will be taken into account when determining individual proposals for development.  Amend the 7 <sup>th</sup> paragraph of the Emerging Draft LPR Policy SP9 as follows – <del>‘Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.’</del> <u>‘Where development would affect the significance of a non-designated heritage asset a balanced judgement will be made which has regard to the scale of any harm or loss and the significance of the heritage asset.’</u>
Historic England (lpr1586)	We welcome and support this policy. We consider the level of detail it includes to be appropriate and clear.	Comments noted
<b>General consultation bodies</b>		
British Horse Society (lpr857)	We are unsure if West Berks commons should be added to this policy or to DC11. We feel that West Berkshire commons are not recognised well enough in this Local Plan Review, possibly because they are not well recognised within the Council as a whole. Many, but not all, are registered and are protected by law, by Schemes of Management and via the Planning Inspectorate. Commons with Schemes of Management include Bucklebury, Padworth, Snelsmore, Wokefield made under the 1899 Commons Act. Greenham and Crookham Commons have their own Act of Parliament. Hungerford Common managed by the ancient Town & Manor of Hungerford. Smaller commons at Oare, East Ilsley, West Isley, Stroud Green. This is not a comprehensive list there may be more. All these commons have public access rights and are heavily used by the public for air & exercise as of right historically. Many of these commons have equestrian rights and are important as traffic-free areas for equestrians. Supporting text, Para 10.75: Add registered and non-registered commons to the list.	Comments noted.  Add another bullet point to Emerging Draft LPR para 10.75 to include <u>‘features on registered and non-registered common land, both those relating to its use by commoners and relict monuments that have survived due to lack of development’</u>

Respondent (with lpr ref)	Response	Council Response
Canal & River Trust (lpr888)	DC10 generally support this policy but seek clarification. Para 10.73 The canal should be considered as a non-designated heritage asset as well as some canal related structures also being listed as heritage assets in their own right. It is noted that the canal is not mentioned as a NDHA, nor were the Trust consulted when the list was revised.	Comments noted.  Add another bullet point to Emerging Draft LPR para 10.75 to include <u>'Built elements of the Kennet &amp; Avon Canal not already on the National Heritage List for England'</u>
Mid and West Berkshire Local Access Forum (lpr1886)	MWBLAF is unsure if West Berkshire commons should be added to this policy or to DC11. We feel that West Berkshire commons are not recognised well enough in this Local Plan Review, possibly because they are not well recognised within the Council as a whole. Many, but not all, are registered and are protected by law, by Schemes of Management and via the Planning Inspectorate. Commons with Schemes of Management made under the 1899 Commons Act include Bucklebury, Padworth, Snelsmore and Wokefield. Greenham and Crookham Commons have their own Act of Parliament. Hungerford Common is managed by the ancient Town & Manor of Hungerford. Smaller commons include Oare, East Ilsley, West Isley and Stroud Green. All of these commons have public access rights and are heavily used by the public for air & exercise as of right historically. The Forum recommends adding an extra bullet to paragraph 10.75: many of which might also be candidates for the Local List of Heritage Assets including: registered and non-registered commons	Comments noted.  See response to (lpr857 above)
West Berkshire Heritage Forum (lpr92)	10.75 The Heritage Forum supports these ambitious objectives, but we are presently limited by its voluntary nature. To advance, Councillors and officers could become more involved in proposing local listings, in research and information, in overcoming hesitations by owners, and especially in promoting the process across the District. The independent nature of the Selection Panel would facilitate this, and its meetings could without undue effort be doubled from the present one per year. Undesignated archaeology sites could be added to the target list. Larger and more complex sites such as the Second Battle will require particular support.	Comments noted
<b>Other stakeholders</b>		

Respondent (with lpr ref)	Response	Council Response
Sam Coppinger (lpr314)	Supports the policy	Comments noted
Councillor Tony Vickers (lpr599)	<p>We support this policy. However we wish to see clear recognition of the heritage value of many public rights of way. The rights of way network in England is a globally unique heritage of enormous historic and cultural value. Its value largely lies in its impact on the landscape and in West Berkshire we have a widespread and varied collection of historic routes. These can be degraded and their heritage value lost even without structures being destroyed. For example, the number of tree species in a hedge bordering a path and their existence alongside banks and/or ditches can be indications of the age and function of a route, even if the hedge or bank was not manmade: banks can result from geological processes where a hedge has existed for many centuries because it protected a route. A "landscape" consists of numerous features some of which may have heritage value and can be objectively described, whereas as a landscape in its entirety cannot. An ancient hedgerow may have archaeological origin - particularly if it forms the boundary of an ancient way. In 10.75 the bullet point "structures relating to transport routes" may include features that carry little evidence of being man-made structures but nevertheless have heritage value. Change "landscapes" in line 2 to "landscape features". Same in 10.72 &amp; 10.73 line 1. In 10.75, insert 'and other features' after 'structures' in the bullet point Structures relating to transport routes.</p>	<p>Comments noted</p> <p>The NPPF defines a heritage asset as 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.' This policy uses the same definition for consistency.</p> <p>Add another bullet point to Emerging Draft LPR para 10.75 to include <u>'structures and earthworks found along historic routeways'</u>.</p> <p>Add to the supporting text of Proposed Submission LPR Policy DM15 - <u>'West Berkshire District's trees, woodland and hedgerows are valued visual and ecological assets in our towns, villages and countryside, adding local character and distinctiveness to the landscape, streets, parks, gardens, public rights of way and other open spaces.'</u></p> <p>The list in para Emerging Draft LPR para 10.75 is not exhaustive.</p>
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1793)	<p>Paragraph 16(f) of the NPPF confirms plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Policy SP9 relates to the historic environment and provides an over-arching framework to consider development proposals. Proposed policies DC8, DC9, DC10, DC11, DC12 and DC13 do not serve a clear purpose and they run contrary to the NPPF at Section 16. It must not be the role of a development plan (as Policy D10 does within the bullet points) to define and restrict new development affecting heritage assets. Instead, the NPPF is clear that in determining applications, local</p>	<p>Comments noted. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. It is noted that Historic England agrees with this approach.</p> <p>The policy makes clear that proposals for development will be determined in accordance with Policy SP9. This DM policy sets out more detailed criteria that will be taken into</p>

Respondent (with lpr ref)	Response	Council Response
	<p>planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.</p> <p>The understanding of significance, through the heritage statement (a requirement under Policy SP9), will itself determine how any heritage asset should be conserved in a manner appropriate to their significance. It is therefore unnecessary for a development management policy to define what may or may not be appropriate when considering change to a heritage asset and its significance.</p> <p>Policy DC10 is not consistent with the NPPF at paragraph 197. The policy does not make clear that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p>	<p>account when determining individual proposals for development.</p> <p>Amend the 7<sup>th</sup> paragraph of the Emerging Draft LPR Policy SP9 as follows <del>'Development which would harm the significance of a non-designated heritage asset or its setting will not be permitted, unless the scale of the harm or loss and the significance of the asset is outweighed by other public benefits that may result from the proposals.'</del>  <u>'Where development would affect the significance of a non-designated heritage asset a balanced judgement will be made which has regard to the scale of any harm or loss and the significance of the heritage asset.'</u></p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC11 Registered Parks & Gardens

### (Proposed Submission LPR Policy: DM12 Registered Parks and Gardens)

Number of responses received: 12

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr778)	Supports the policy. I note that hyperlinks have been included in the supporting text of this DC policy, ie to Historic England and the Gardens Trust. This useful linkage could equally be made for the other DC policies relating to the historic environment.	Comments noted. Relevant links will be included throughout the document, as appropriate, in the Proposed Submission LPR.
<b>Statutory consultees</b>		
Hungerford Town Council (lpr377)	ok	Comments noted
Holybrook Parish Council (lpr1325)	The Linear Park is not on the 'Register of Historic Parks and Gardens of Special Historic Interest in England' however the Park has been Awarded Green Flag status for 11 consecutive years and it should, therefore, be listed by the Council as a protected local asset.	Local listing is managed jointly by the Council and the West Berkshire Heritage Forum. Guidance on the process and approaches to the selection and assessment of heritage assets is set out on our website - <a href="https://info.westberks.gov.uk/locallist">https://info.westberks.gov.uk/locallist</a> . If the Parish Council could give us more information on the heritage interest of the Park we could propose it for listing if appropriate.
Shaw cum Donnington Parish Council (lpr231)	We support the policy	Comments noted



<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
Stratfield Mortimer Parish Council (lpr419)	Supports the policy	Comments noted
Historic England (lpr1587)	We welcome and support this policy. We consider the level of detail it includes to be appropriate and clear.	Comments noted
<b>General consultation bodies</b>		
British Horse Society (lpr858)	Please see comment above to DC10	Comments noted and responded to under Emerging Draft LPR Policy DC10.
Mid and West Berkshire Local Access Forum (lpr1887)	MWBLAF is unsure if West Berkshire commons should be added to this policy or to DC10. Please see our comments in the response to DC10.	Comments noted and responded to under Emerging Draft LPR Policy DC10.
West Berkshire Heritage Forum (lpr100)	Supports the policy	Comments noted
<b>Other stakeholders</b>		
Nataliya Topliss (lpr814)	There are no registered green parks and gardens in Thatcham. It seems that West Berks council's policy is to allow the developers to cut down all mature trees in the area. There is no integrity in landscaping. The developers build eye sore housing and the council's planning department and trees officers never care to visit the developments sites to see all destruction the housing developments are causing to our environment.	Comments noted. They deal with issues wider than just registered historic parks and gardens and are covered under Proposed Submission LPR Policies SP7, SP8, SP10 and DM15 Trees, Woodland and Hedgerows.
Councillor Tony Vickers (lpr602)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		

Respondent (with lpr ref)	Response	Council Response
Fowler Architecture and Planning (lpr1794)	<p>Paragraph 16(f) of the NPPF confirms plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Policy SP9 relates to the historic environment and provides an over-arching framework to consider development proposals.</p> <p>Proposed policies DC8, DC9, DC10, DC11, DC12 and DC13 do not serve a clear purpose and they run contrary to the NPPF at Section 16.</p> <p>It must not be the role of a development plan (as Policy D11 does within criteria i to vii) to define and restrict new development affecting heritage assets. Instead, the NPPF is clear that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.</p> <p>The understanding of significance, through the heritage statement (a requirement under Policy SP9), will itself determine how any heritage asset should be conserved in a manner appropriate to their significance. It is therefore unnecessary for a development management policy to define what may or may not be appropriate when considering change to a heritage asset and its significance.</p>	<p>Comments noted. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. It is noted that Historic England agrees with this approach.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC12 Registered Battlefields

### (Proposed Submission LPR Policy: DM13 Registered Battlefields)

Number of responses received: 8

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr779)	Supports the policy	Comments noted
<b>Statutory consultees</b>		
Shaw cum Donnington Parish Council (lpr232)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr420)	Supports the policy	Comments noted
Historic England (lpr1588)	We welcome and support this policy. We consider the level of detail it includes to be appropriate and clear.	Comments noted
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr101)	Supports the policy	Comments noted
<b>Other stakeholders</b>		

Respondent (with lpr ref)	Response	Council Response
Nataliya Topliss (lpr815)	The impact of the development cannot be minimised. The area must be left undeveloped to protect insects and wildlife.	Comments noted. The policy has been written in the context of the NPPF which makes it clear that substantial harm or loss to Registered Battlefields should be wholly exceptional.
Councillor Tony Vickers (lpr603)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1795)	<p>Paragraph 16(f) of the NPPF confirms plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Policy SP9 relates to the historic environment and provides an over-arching framework to consider development proposals. Proposed policies DC8, DC9, DC10, DC11, DC12 and DC13 do not serve a clear purpose and they run contrary to the NPPF at Section 16. It must not be the role of a development plan (as Policy D11 does within criteria i to ix) to define and restrict new development affecting heritage assets. Instead, the NPPF is clear that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.</p> <p>The understanding of significance, through the heritage statement (a requirement under Policy SP9), will itself determine how any heritage asset should be conserved in a manner appropriate to their significance. It is therefore unnecessary for a development management policy to define what may or may not be appropriate when considering change to a heritage asset and its significance.</p>	Comments noted. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. It is noted that Historic England agrees with this approach.

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC13 Assets of Archaeological Importance

### (Proposed Submission LPR Policy: DM14 Assets of Archaeological Importance)

Number of responses received: 7

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr780)	Supports the policy	Comments noted
<b>Statutory consultees</b>		
Shaw cum Donnington Parish Council (lpr233)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr421)	Supports the policy	Comments noted
Historic England (lpr1589)	We welcome and support this policy. We consider the level of detail it includes to be appropriate and clear.	Comments noted
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr102)	Supports the policy	Comments noted
<b>Other stakeholders</b>		

Respondent (with lpr ref)	Response	Council Response
Councillor Tony Vickers (lpr604)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1796)	<p>Paragraph 16(f) of the NPPF confirms plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Policy SP9 relates to the historic environment and provides an over-arching framework to consider development proposals. Proposed policies DC8, DC9, DC10, DC11, DC12 and DC13 do not serve a clear purpose and they run contrary to the NPPF at Section 16.</p> <p>It must not be the role of a development plan (as Policy D13 does) to define and restrict new development affecting heritage assets. Instead, the NPPF is clear that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance. The understanding of significance, through the heritage statement (a requirement under Policy SP9), will itself determine how any heritage asset should be conserved in a manner appropriate to their significance. It is therefore unnecessary for a development management policy to define what may or may not be appropriate when considering change to a heritage asset and its significance.</p>	Comments noted. The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers. It is noted that Historic England agrees with this approach.

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC14 Trees, woodlands and hedgerows (Proposed Submission LPR Policy: DM15 Trees, woodlands and hedgerows)

Number of responses received: 26

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr781)	Policy is supported.	Comments noted
West Berkshire Council Ecologist (lpr1696)	Para 10.100 - The purpose of this Policy is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting are realised. This policy does not prevent the appropriate management of trees, woodlands and hedgerow or removal of trees and hedges that are not in character with their locality <u>particularly if they are a non-native species of flora.</u>	Comments noted.  Amend the supporting text as follows: 'This policy does not prevent the appropriate management of trees, woodlands and hedgerow or removal of trees and hedges that are not in character with their locality <u>particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.</u> '
<b>Statutory consultees</b>		
Greenham Parish Council (lpr911)	Whilst the Council supports the planting of trees in the countryside, GPC would like to add that if it is proposed to carry out large scale tree planting within two expected tree heights of an existing development a planning application should be required.	Comments noted. It is not the intention of the policy to enable large scale planting. The large scale planting of trees is not a matter for planning legislation.
Holbrook Parish Council (lpr1326)	Policy DC14 is welcomed. In particular, 'the policy encourages new planting and protects trees, woodland and hedgerows because of their habitat value,	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	important role in the mitigation and adaptation to climate change and the contribution to the amenity of a particular locality’.	
Hungerford Town Council (lpr160)	Strongly support for current visual / wildlife and carbon sequestration.	Comments noted.
Newbury Town Council (lpr2243)	<p>Include provision in this policy for large tree planting schemes in or near settlements to have prior planning permission. Reason: Large areas of new tree planting near to residential areas should require planning permission. They can cause harm to the amenity of nearby homes. Change proposed: Add to end of policy, in separate paragraph: “Whilst the Council supports the planting of trees in the countryside, which is normally not a matter for the LPA, large areas of tree planting can over time cause harm to the amenity of nearby residential properties. Therefore, schemes for more than [n] trees capable of reaching a height in excess of [m] metres may require planning consent if within a settlement area or if the nearest settlement boundary is within [x] metres of any part of the proposed planted area.</p>	<p>Comments noted. The suggested paragraph falls outside the scope of the Local Plan Review.</p>
Shaw-cum-Donnington Parish Council (lpr234)	We support the policy.	Comments noted.
Stratfield Mortimer Parish Council (lpr422)	<p>The policy should be to not plant trees of genus/species that are subject to fatal diseases and listed as such by the RHS and/or DEFRA. Also, tree genus and/or species should be chosen that have characteristics that are likely to be suitable for the consequences of climate change - heat and ability to absorb water and act as a flood defence.</p>	<p>Comments noted. Amend policy to include text as follows – <u>‘Where appropriate, suitable opportunities should be identified and incorporated for the restoration and planting of new trees, woodland and hedgerows. New planting should:</u></p> <ul style="list-style-type: none"> <li>• <u>Be suitable for the site conditions;</u></li> <li>• <u>Use appropriate tree pit sizes and soil volumes;</u></li> <li>• <u>Use native species whenever appropriate;</u></li> <li>• <u>Be informed by and contribute to local character;</u> <u>and</u></li> <li>• <u>enhance or create new habitat linkages.</u></li> </ul>



Respondent (with lpr ref)	Response	Council Response
		<p><u>To ensure the sustainable growth of restored or newly planted trees, development will be required to include appropriate measures to secure their long term maintenance.'</u></p> <p>Amend the supporting text as follows:            'The purpose of this Policy is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting are realised <u>where appropriate. Development proposals will be considered in accordance with the latest guidance in British Standard BS5837 'Trees in relation to demolition, design and development.</u></p> <p>This policy does not prevent the appropriate management of trees, woodlands and hedgerow or removal of trees and hedges that are not in character with their locality particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged <u>particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.'</u></p>
Thatcham Town Council (lpr1416)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <p>'The policy encourages new planting and protects trees, woodland and hedgerows because of their habitat value' - We support the protection of trees, woodland and hedgerows. Historic hedgerows are of particular value in rural countryside areas surrounding NE Thatcham as they provide wildlife corridors between disjointed areas of remaining ancient woodland. It is important that such hedgerows are preserved.            'will be considered in accordance with policy DC12, for those within Registered Parks and Gardens, or policy DC11 for those forming part of</p>	<p>Comments noted.</p> <p>The cross references to other policies will be corrected.</p> <p>Some of the comments relate specifically to Policy SP17 and so will be considered as part of the Council's response under that policy.</p> <p>Amend the supporting text to include the following paragraphs as follows –</p>

Respondent (with lpr ref)	Response	Council Response
	<p>non-designated heritage assets.’ It is unclear to us whether these cross references are correct as DC 12 refers to registered battlefields, and DC 11 refers to registered parks and gardens.</p> <p>‘Loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation including aftercare will be required.’ - It is unclear what period of after care is required. The replacement of ancient, or mature, hedgerows with replacement requires a maintenance contract for many decades.</p> <p>It is necessary that the references to other policies is corrected.</p> <p>It is essential that this policy reads through to the Stage 3 Strategic Plan for Thatcham and mature hedgerows are preserved.</p> <p>It is necessary to define the period of aftercare and that supporting text describes the type of maintenance required.</p>	<p><u>‘The protection of existing trees, woodland and hedgerows and the addition of new planting contributes greatly to conserving and enhancing the local character of an area. Boundary treatments are particularly important and the character of an area can easily be lost if front gardens or boundary hedgerows are removed. There is evidence in both rural and urban areas of the district of long established boundary hedgerows being ripped out and replaced by close boarded fencing or walls. A proportion of these result in retrospective applications to retain fences or walls in excess of 1 metre next to highways. Where planning applications are required to propose new boundary treatments or retrospective applications are required to regularise works already undertaken and it is clear that an established hedgerow will or has been removed, the Council will require sufficient space to be left to allow for the retention of an existing hedge or planting of a new one to replace the one that has been removed.</u></p> <p><u>The retention of existing trees and hedgerows within new gardens adds a sense of establishment and maturity to any new development. New planting can also add value, with the use of dwarfing rootstocks a way of accommodating trees in smaller gardens.’</u></p> <p>The Environment Act establishes that long term maintenance is considered to be 30 years.</p>
Historic England (lpr1590)	We welcome and support this policy. We consider the level of detail it includes to be appropriate and clear.	Comments noted
<b>General consultation bodies</b>		
British Horse Society (lpr859)	In West Berkshire, there are many miles of hedgerow and trees growing on or alongside public rights of way, especially alongside the many byways and	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>restricted byways. These routes can be used to access development to the detriment of the rural character of the way. For example, developments at Hungerford Mill have allowed the erection of close boarded fencing which has adversely changed the nature &amp; character of the way &amp; the area.</p> <p>This is referred to in para 11.64 - <i>West Berkshire District's trees, woodland and hedgerows are valued visual and ecological assets in our towns, villages and countryside, adding local character and distinctiveness to the landscape, streets, parks, gardens, <b>public rights of way</b> and other open spaces.</i></p>	<p>Amend the first sentence of the policy as follows: 'West Berkshire District's trees, woodland and hedgerows are valued visual and ecological assets in our towns, villages and countryside, adding local character and distinctiveness to the landscape, streets, parks, gardens, <u>public rights of way</u> and other open spaces.' and move to start of the 3<sup>rd</sup> paragraph of the supporting text.</p> <p>Amend the supporting text to include the following paragraphs as follows –</p> <p><u>'The protection of existing trees, woodland and hedgerows and the addition of new planting contributes greatly to conserving and enhancing the local character of an area. Boundary treatments are particularly important and the character of an area can easily be lost if front gardens or boundary hedgerows are removed. There is evidence in both rural and urban areas of the district of long established boundary hedgerows being ripped out and replaced by close boarded fencing or walls. A proportion of these result in retrospective applications to retain fences or walls in excess of 1 metre next to highways. Where planning applications are required to propose new boundary treatments or retrospective applications are required to regularise works already undertaken and it is clear that an established hedgerow will or has been removed, the Council will require sufficient space to be left to allow for the retention of an existing hedge or planting of a new one to replace the one that has been removed.</u></p> <p><u>The retention of existing trees and hedgerows within new gardens adds a sense of establishment and maturity to any new development. New planting can also add value, with the use of dwarfing rootstocks a way of</u></p>

Respondent (with lpr ref)	Response	Council Response
		accommodating trees in smaller gardens.’
Canals and Rivers Trust (lpr889)	The final paragraph of the policy should also include hedgerows which are really important for helping animals to move through a landscape safely	<p>Comment noted.</p> <p>Amend last paragraph of the policy as follows –  <u>Where appropriate, suitable opportunities should be identified and incorporated for the restoration and planting of new trees, woodland and hedgerows. New planting should:</u></p> <ul style="list-style-type: none"> <li>• <u>Be suitable for the site conditions;</u></li> <li>• <u>Use appropriate tree pit sizes and soil volumes;</u></li> <li>• <u>Use native species whenever appropriate;</u></li> <li>• <u>be informed by and contribute to local character; and</u></li> <li>• <u>enhance or create new habitat linkages.</u></li> </ul> <p><u>To ensure the sustainable growth of restored or newly planted trees, development will be required to include appropriate measures to secure their long term maintenance.’</u></p> <p><del>Sufficient space within developments will be reserved for the planting and sustainable growth of large trees individually, in groups or lines in order to maintain and improve tree canopy cover in the built environment, and in the District as a whole.</del></p>
Heritage Forum (lpr103)	Policy is supported.	Comments noted.
Mid & West Berks Local Access Forum (lpr1888)	In West Berkshire, there are many miles of hedgerow and trees growing on or alongside public rights of way, especially alongside the many byways and restricted byways. These routes can be used to access development to the detriment of the rural character of the way. For example, developments at Hungerford Mill have allowed the erection of close boarded fencing which has adversely changed the nature and character of the way and the area.	<p>Comments noted.</p> <p>Amend policy to remove first paragraph as follows –  <del>‘West Berkshire District’s trees, woodland and hedgerows are valued visual and ecological assets in our towns, villages and countryside, adding local character and distinctiveness to the landscape, streets, parks, gardens,</del></p>

Respondent (with lpr ref)	Response	Council Response
	<p>This issue is addressed in the policy DC 25 on Extension of residential curtilages in the countryside, paragraph 11.64. The Forum recommends adding public rights of way to the first paragraph of the policy</p>	<p><del>and other open spaces. The policy encourages new planting and protects trees, woodland and hedgerows because of their habitat value, important role in the mitigation and adaptation to climate change and the contribution to the amenity of a particular locality.</del> <u>Development which conserves and enhances trees, woodland and hedgerows will be permitted.</u></p> <p>Amend the supporting text to include the following paragraphs as follows –</p> <p><u>'The protection of existing trees, woodland and hedgerows and the addition of new planting contributes greatly to conserving and enhancing the local character of an area. Boundary treatments are particularly important and the character of an area can easily be lost if front gardens or boundary hedgerows are removed. There is evidence in both rural and urban areas of the district of long established boundary hedgerows being ripped out and replaced by close boarded fencing or walls. A proportion of these result in retrospective applications to retain fences or walls in excess of 1 metre next to highways. Where planning applications are required to propose new boundary treatments or retrospective applications are required to regularise works already undertaken and it is clear that an established hedgerow will or has been removed, the Council will require sufficient space to be left to allow for the retention of an existing hedge or planting of a new one to replace the one that has been removed.</u></p> <p><u>The retention of existing trees and hedgerows within new gardens adds a sense of establishment and maturity to any new development. New planting can also add value, with the use of dwarfing rootstocks a way of</u></p>

Respondent (with lpr ref)	Response	Council Response
		accommodating trees in smaller gardens.’
North Wessex Downs AONB (lpr1614)	<p>Policy is supported. Trees make an important contribution to fighting climate change but also form part of the AONB landscape. However, there are some landscape character areas that are defined/characterised by a lack of planting and where the planting of trees in future would adversely affect the landscape by altering its character. We endorse tree planting but only the right trees in the right location.</p> <p>We would request the inclusion of the words where appropriate into the first paragraph of the policy to read.... The policy encourages new planting <b>where appropriate</b> and protects trees, woodland and hedgerows because of the habitat value ....</p>	<p>Comments noted.</p> <p>Amend policy to remove first paragraph as follows – <del>‘West Berkshire District’s trees, woodland and hedgerows are valued visual and ecological assets in our towns, villages and countryside, adding local character and distinctiveness to the landscape, streets, parks, gardens, and other open spaces. The policy encourages new planting and protects trees, woodland and hedgerows because of their habitat value, important role in the mitigation and adaptation to climate change and the contribution to the amenity of a particular locality. Development which conserves and enhances trees, woodland and hedgerows will be permitted.’</del></p> <p>Include additional text as new 9<sup>th</sup> paragraph as follows – <u>‘Where appropriate, suitable opportunities should be identified and incorporated for the restoration and planting of new trees, woodland and hedgerows....’</u></p> <p>Move the deleted first sentence of the policy to start of the 3<sup>rd</sup> paragraph of the supporting text as follows: <u>‘West Berkshire District’s trees, woodland and hedgerows are valued visual and ecological assets in our towns, villages and countryside, adding local character and distinctiveness to the landscape, streets, parks, gardens, public rights of way and other open spaces.’</u></p>
The Woodland Trust (lpr983)	We welcome the recognition given to the importance of ancient woodland and other protected trees, woodland and hedgerows. Ancient woodland is a precious habitat that should be protected and managed in a sustainable way to maximise its wildlife, landscape and historical value.	<p>Comments noted.</p> <p>Amend the end of the 3<sup>rd</sup> paragraph of the policy as follows – <u>‘Ancient woodland, ancient and veteran trees are irreplaceable habitats. Development resulting in their loss</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost. Further information is available in the Woodland Trust's <i>Planners' Manual for ancient woodland (2019)</i>.</p> <p>We welcome the requirement for appropriate replacement of trees whose removal is unavoidable. We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on <i>Local Authority Tree Strategies</i> (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>We welcome the positive reference to native species, and would further encourage the specification where possible of UK and Ireland sourced and grown tree stock for new planting, to support biodiversity and resilience.</p> <p>We recommend setting specific targets for canopy cover across the District, and a specific target for development sites, in response to the climate crisis and as part of the emerging requirement for biodiversity net gain.</p> <p>The Woodland Trust recommends setting a 30% target for canopy cover on development sites, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure. More information can be found in the Trust's 2020 publication <a href="#">The Emergency Tree Plan</a>.</p>	<p><del>or deterioration of ancient woodland or veteran trees which are irreplaceable will be considered in accordance with Policy SP11. be refused unless it accords with the exceptional reasons identified within the National Planning Policy Framework. If exceptional reasons are justified a suitable compensation including its delivery and ongoing upkeep will need to be secured. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat.</del></p> <p>Amend the 5<sup>th</sup> paragraph of the supporting text as follows - 'Development should buffer any ancient woodland, <u>ancient</u> and veteran trees it affects by providing sufficient space to afford surrounding protection and allow for future growth and expansion where possible. <u>Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for development. The Council will adopt a precautionary approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.</u> It is important that a buffer zone consists of semi-natural habitats such as woodland and/or a mix of scrub,</p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>grassland, heathland and wetland. Development proposals, including gardens would not be appropriate. Sustainable drainage schemes would only be considered acceptable if they did not affect root protection areas and any changes to the water table did not negatively affect ancient woodland or ancient and veteran trees. The Woodland Trust <a href="http://woodlandtrust.org.uk">planners-manual-for-ancient-woodland.pdf (woodlandtrust.org.uk)</a> highlights the importance of protecting and enhancing natural habitats around ancient woodland in order to help reverse the historic fragmentation of this irreplaceable habitat and to improve ecological connectivity with the surrounding landscape.'</u></p> <p>Amend the supporting text as follows:  'The purpose of this Policy is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting are realised <u>where appropriate. Development proposals will be considered in accordance with the latest guidance in British Standard BS5837 'Trees in relation to demolition, design and development.</u></p> <p>This policy does not prevent the appropriate management of trees, woodlands and hedgerow or removal of trees and hedges that are not in character with their locality particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged <u>particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.'</u></p> <p>The supporting text makes clear that the Council needs to better understand what proportion of the District has</p>



Respondent (with lpr ref)	Response	Council Response
		canopy cover and the extent of the functions this provides before setting targets specific to West Berkshire.
<b>Other stakeholders</b>		
Sam Coppinger (lpr318)	Planting is important. In rural settings it should mimic the surroundings. Non-native specimens should be avoided.	<p>Comments noted.</p> <p>Amend the supporting text as follows:            'The purpose of this Policy is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting are realised <u>where appropriate. Development proposals will be considered in accordance with the latest guidance in British Standard BS5837 'Trees in relation to demolition, design and development.</u></p> <p>This policy does not prevent the appropriate management of trees, woodlands and hedgerow or removal of trees and hedges that are not in character with their locality particularly if they are a non-native species of flora.            For new planting the use of UK and Ireland sourced and grown tree stock is encouraged <u>particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.'</u></p>
Carol Ann Edgar (lpr1474)	I would like to comment on this Plan by asking you to give full environmental consideration to the preservation of trees in urban areas.	<p>Comments noted.</p> <p>Amend the supporting text as follows:            'The purpose of this Policy is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting are realised <u>where appropriate. Development proposals will be considered in accordance with the latest guidance in British Standard BS5837 'Trees in relation to demolition, design and development.</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p>This policy does not prevent the appropriate management of trees, woodlands and hedgerow or removal of trees and hedges that are not in character with their locality particularly if they are a non-native species of flora.</p> <p>For new planting the use of UK and Ireland sourced and grown tree stock is encouraged <u>particularly if they are a non-native species of flora. For new planting the use of UK and Ireland sourced and grown tree stock is encouraged.</u></p>
Alastair Jarman (lpr721)	<p>Policy not supported. I believe there is a general weakness in DC14 in that it lacks an advisory framework or guidance of sufficient breadth and weight to fulfil its role. Whilst other plan elements hint at aspects of the NPPF and other regulatory requirements regarding landscape and the natural environment, I feel that a policy with woodlands, trees and hedgerows as its heading should be the primary reference.</p> <p>By comparison, Basingstoke and Deane, who share their southern border with West Berkshire and therefore have to work together on cross border planning and development issues, support their local plan with a Landscape, Biodiversity and Trees Supplementary Planning Document 2018. This document is not site specific but is guidance that can be used in advance of site selection and planning to inform early decision making and help avoid monetary or environmental costs later in a project that could have been avoided. <a href="https://www.basingstoke.gov.uk/content/page/59292/Landscape,%20Biodiversity%20and%20Trees%20SPD.pdf">https://www.basingstoke.gov.uk/content/page/59292/Landscape,%20Biodiversity%20and%20Trees%20SPD.pdf</a></p> <p>It states in its introduction.</p> <p>“1.1 This Supplementary Planning Document (SPD) has been produced to expand upon the natural environment policies in the Basingstoke and Deane Local Plan (2011- 2029). It addresses how landscape, biodiversity, and tree considerations should inform new development to deliver high quality, sustainable places to live, that enhance biodiversity and support healthy lifestyles.”</p> <p>I would like to see either stronger wording and guidance within this policy, or reference made to a Supplementary Planning Document relating specifically to trees, woodland and hedgerows that would contain guidance and policy reflecting the same principles as adjoining local authorities. I believe this also assist on sites with cross boundary issues.</p>	<p>Comments are noted.</p> <p>The LPR and Basingstoke and Deane Local Plan approach this topic differently; the latter containing more general policies covering the natural environment rather than a specific policy on trees, woodland and hedgerows. At this stage the Council believes the policy should be effective without the need for further detailed guidance in a specific Supplementary Planning Document. The Council will be producing further local design guidance in accordance with the NPPF and it is anticipated that this issue will be covered in that way. Should the situation change once the LPR is adopted however, and further specific guidance prove to be necessary then the Council will act accordingly.</p> <p>The cross references to other policies and any presentational anomalies will be corrected.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>OBSERVATION. I note this policy is simply listed in the left-hand selection pane as CS14, it is missing its described title, unlike other policies. It makes it feel like an afterthought and harder to find.</p> <p>“1.6 The SPD explains how landscape, biodiversity and tree considerations should be integrated into the development process from the outset, to ensure that legislation and Local Plan policy requirements are met and best practice standards are achieved. It expands upon the policies in the Local Plan and details the council’s requirements for new development that must be met to achieve planning permission. Where development does not accord with the guidance set out in this document it may be refused.”</p>	
Alastair Jarman (lpr363)	<p>I agree with this policy, which makes mention of the NPPF 2019, but paragraph 170 of this new policy now has stronger protection for sites of biodiversity value and a requirement that wherever possible development should help improve local environmental conditions. There has also been a shift from minimising impacts on biodiversity and geodiversity to protection and enhancement. Paragraph 175 c) has introduced stronger protection for irreplaceable habitats (including ancient woodlands and veteran trees) where any development should be refused unless there are wholly exceptional reasons. Footnote 58 introduces a public benefit test with specific examples including nationally significant infrastructure projects, Transport and Works Act Orders and hybrid bills.</p> <p>I do not feel the meaning of "exceptional reasons" when considering ancient woodland regarding para 175 c of NPPF 2019 is being correctly applied in all cases. I would consider something like the HS2 or the Channel Tunnel would meet this description, even the Newbury Bypass, which became part of the national strategic road network and removed traffic from the centre of Newbury, albeit temporarily, would also meet this test. I do not believe local housing sites which are commonplace and bring further pressures not only to the ancient woodland, its ecology and habitat, but also the roads and residents across all of Newbury and beyond fit the definition of exceptional. Mitigations for loss or deterioration should only be considered once this first test of exceptional circumstances has been proven. Ancient woodland, ancient trees and veteran trees are irreplaceable and consequently, compensation measures should not consider as part of the assessment of the merits against any development proposal.</p>	<p>Comments noted.</p> <p>The NPPF has been updated since the representation was made and this is reflected in policy SP11 which sets out the Council’s approach to biodiversity and geodiversity. This policy should be read alongside that policy.</p> <p>Amend the end of the 3<sup>rd</sup> paragraph of the policy as follows – <u>‘Ancient woodland, ancient and veteran trees are irreplaceable habitats. Development resulting in their loss or deterioration of ancient woodland or veteran trees which are irreplaceable will be considered in accordance with Policy SP11. be refused unless it accords with the exceptional reasons identified within the National Planning Policy Framework. If exceptional reasons are justified a suitable compensation including its delivery and ongoing upkeep will need to be secured. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat.’</u></p> <p>Amend the 5<sup>th</sup> paragraph of the supporting text as follows - <u>‘Development should buffer any ancient woodland, ancient and veteran trees it affects by providing sufficient space to afford surrounding protection and allow</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>I note a lack of consistency regarding ancient woodland buffers. These include, provide a 15m buffer, buffers of at least 15m, one makes no mention of buffer distance, one mentions TPO woodland and one site with many TPO woodlands makes no mention of them or buffer distance. It is important to note but not properly explained policy, that for ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage, which is classed as direct impact. Where assessments show other impacts may extend beyond this distance, you are likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic. It is therefore not appropriate to dictate a direct impact buffer of 15m in the local plan without clarifying that further details and surveys need to be produced to inform the actual buffer dimensions required. It is welcomed that ancient woodland is identified within each development area, but the wording should be similar in effect to, “A minimum of 15m for root protection and other direct impacts must be maintained, additional distance may be required to prevent deterioration from indirect impacts.”</p> <ol style="list-style-type: none"> <li>1. RSA 6 - Appropriate buffers of at least 15 metres between the development and the areas of ancient woodland.</li> <li>2. RSA 10 - Provide a 15m buffer to ancient woodland.</li> <li>3. RSA 18 - Ensure a 15m buffer to ancient woodland and retain existing woodland on the site.</li> <li>4. RSA 26 - Provide a buffer of 15 metres to the areas of ancient woodland to the west of the site and provide appropriate buffers to the rest of the TPO woodland.</li> <li>5. RSA 20 Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements that will include amongst others, the need for a buffer between the developable area and the ancient woodland and Local Wildlife Site which adjoin the site to the west.</li> <li>6. SP16 - conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland; mitigate the increased recreational pressure on nearby sensitive wildlife sites, secure strategic biodiversity enhancements.</li> </ol>	<p>for future growth and expansion where possible. <u>Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for development. The Council will adopt a precautionary approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.</u></p> <p><u>It is important that a buffer zone consists of semi-natural habitats such as woodland and/or a mix of scrub, grassland, heathland and wetland. Development proposals, including gardens would not be appropriate. Sustainable drainage schemes would only be considered acceptable if they did not affect root protection areas and any changes to the water table did not negatively affect ancient woodland or ancient and veteran trees. The Woodland Trust <a href="http://woodlandtrust.org.uk">planners-manual-for-ancient-woodland.pdf (woodlandtrust.org.uk)</a> highlights the importance of protecting and enhancing natural habitats around ancient woodland in order to help reverse the historic fragmentation of this irreplaceable habitat and to improve ecological connectivity with the surrounding landscape.’</u></p> <p>By definition “wholly exceptional circumstances” is subject to exceptional consideration and does not fall within a set</p>

Respondent (with lpr ref)	Response	Council Response
	<p>In a recent response to a planning refusal for 20/01238/OUTMAJ the case officer stated: “5.16 Ancient Woodland. The Applicants’ plans and documentation refer to a 15m buffer between built development and the Ancient Woodlands, consistent with the SPD. The intended design approach for the buffer is also shown in the Design and Access Statement, again reflecting the principles in the SPD.</p> <p>5.17 A planning condition could be drafted to specify (1) that each buffer should be not less than 15m in width, (2) the measure for calculating this, and (3) the uses that would be permissible within the buffer zone. Such a planning condition would control the reserved matters applications and the various schemes which are proposed in relation to landscape and ecological management and the design of the Country Park.</p> <p>7.5 Ancient Woodland. See para 5.16 and 5.17 for comments regarding the definition of the Buffer and how this would inform the reserved matters stage. Whilst the existing sports facilities at Park House School do have lighting, the Park House School Feasibility Study prepared by the Applicants does not include lighting of the new playing field and hence it was not considered in the lighting assessment (the earlier Park House School Study prepared by Corde on behalf of the Council did not specify lighting).”</p> <p>I believe these 3 statements within the 238-page response provide evidence that non-direct impacts are not being given sufficient consideration by developers. Firstly, they show a failure to recognise that this minimum buffer is solely for direct impacts on root protection and yet are already indicating activity within the buffer. Secondly the fact that lighting is not being considered shows a lack of consideration of non-direct impacts.</p> <ul style="list-style-type: none"> <li>○ Greater guidance should be given on what is “exceptional”. I have read many inspector reports where the Local Authorities understanding of exceptional is not shared with inspectors. Para 175 C cannot be applied correctly if “exceptional” holds different means for different people with differing agendas.</li> <li>○ Greater emphasis and clarity on direct impact and non-direct impact regarding buffers. If this aspect were better communicated in the policy it would inform not only the housing site allocation selection, but hopefully</li> </ul>	<p>of ‘rules’. The outcome is informed by individual assessment and the judgement applied to planning decisions taking account of all relevant matters in each case. Compensation will only be taken into account once the test of wholly exceptional circumstances is satisfied.</p> <p>The lack of consistency regarding ancient woodland buffers relating to individual site allocation policies will be considered further under each of the relevant RSA policies. Depending on the individual site circumstances, each policy will contain the following text - <u>‘There will be an appropriate buffer of at least 15 metres between the development and ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development.’</u></p> <p>The cross references to other policies will be corrected.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>land use within the site when initial plans are being discussed or submitted.</p> <ul style="list-style-type: none"> <li>○ Housing numbers must not be the driver for designs around any irreplaceable habitats, the drivers must be stopping degradation of irreplaceable habitats which should then inform the level of housing, site use, layout, design, and financial viability in advance of applications.</li> <li>○ OBSERVATION “historic parks and gardens will be considered in accordance with policy DC12, for those within Registered Parks and Gardens, or policy DC11 for those forming part of non-designated heritage assets.” - Note, these references are incorrect.</li> </ul>	
Ian Parsons (lpr841)	Is it feasible to increase the significance of hedgerows in planning applications, and also to protect them in the same way that trees are protected?	<p>Comments noted. That is the intention of the policy.</p> <p>Amend the supporting text to include the following paragraphs –</p> <p><u>The protection of existing trees, woodland and hedgerows and the addition of new planting contributes greatly to conserving and enhancing the local character of an area. Boundary treatments are particularly important and the character of an area can easily be lost if front gardens or boundary hedgerows are removed. There is evidence in both rural and urban areas of the district of long established boundary hedgerows being ripped out and replaced by close boarded fencing or walls. A proportion of these result in retrospective applications to retain fences or walls in excess of 1 metre next to highways. Where planning applications are required to propose new boundary treatments or retrospective applications are required to regularise works already undertaken and it is clear that an established hedgerow will or has been removed, the Council will require sufficient space to be left to allow for the retention of an existing hedge or planting of a new one to replace the one that has been removed.</u></p> <p>The retention of existing trees and hedgerows within new gardens adds a sense of establishment and maturity to any</p>

Respondent (with lpr ref)	Response	Council Response
		new development. <u>New planting can also add value, with the use of dwarfing rootstocks a way of accommodating trees in smaller gardens.'</u>
Nataliya Topliss (lpr816)	<p>The developments always result in mature trees being cut down. The council approve planning permission where little space left for any landscaping. All mature trees get cut down by the developers or the new residents as they have no space left near their property by excessive development. The policy DC14 does not work.</p> <p>I believe that the policy DC14 does not work as the council issues the policy and do follow its terms. The council always allow the developers to destroy mature trees, woodlands and hedgerows. We, the residents, have all witnessed this in Thatcham area.</p>	<p>Comments noted.</p> <p>Whilst not accepting the premise, it should be noted that this is a new policy to the Local Plan and reflects the importance to which the Council is giving trees, woodland and hedgerows in the District.</p>
Councillor Tony Vickers (lpr605)	<p>We support this policy. However we wish to include provision for large tree planting schemes in or near settlements to have prior planning permission. Large areas of new tree planting near to residential areas can cause harm to the amenity of nearby homes.</p> <p>Add to end of policy, in separate paragraph:          "Whilst the Council supports the planting of trees in the countryside, which is normally not a matter for the LPA, large areas of tree planting can over time cause harm to the amenity of nearby residential properties. Therefore schemes for more than [n] trees capable of reaching a height in excess of [m] metres may require planning consent if within a settlement area or if the nearest settlement boundary is within [x] metres of any part of the proposed planted area.          A Tree Officer should advise on the appropriate number dimensions.</p>	<p>Comments noted.</p> <p>The suggested paragraph falls outside the scope of the Local Plan Review.</p>
<b>Landowners, site promoters and developers</b>		
Lichfields for North East Thatcham Consortium (lpr2409)	The North East Thatcham site includes tree and hedgerow coverage and abuts woodland in multiple locations. Whilst every effort will be made to conserve and enhance these features in situ through a landscape led masterplan, if there is need for any losses we recognise that the policy	Comments noted

Respondent (with lpr ref)	Response	Council Response
	allows for appropriate replacement or compensation for non-protected features.	
LRM Planning for Bloor Homes and Sandford Farm (lpr2176)	<p>Paragraph 3 of this policy concerns ancient woodland and veteran trees, indicating that the loss or deterioration of such features would only be permissible where it accords with the exceptional circumstances identified within the NPPF. Footnote 58 of the NPPF refers to exceptional circumstances but this is prefaced by "for example". These examples are not therefore exhaustive, requiring each situation to be considered on the basis of its individual circumstances. As presently drafted, this Policy appears to prohibit this interpretation and should be recast accordingly.</p> <p>Moreover, this policy seeks to retain or prevent damage to non-protected trees, woodland and hedgerows. Whilst the arboricultural resource is important to the natural environment, there are instances where the value of such existing features is especially limited (low value category) and do not warrant retention as a matter of principle. Equally there may be features which, if required to be retained, could preclude design benefits or advantages from being achieved that would contribute to other policy objectives. In this context design considerations need to be assessed in the round.</p>	<p>Comments noted.</p> <p>Amend the policy as follows – '<u>Ancient woodland, ancient and veteran trees are irreplaceable habitats. Development resulting in their loss or deterioration of ancient woodland or veteran trees which are irreplaceable will be considered in accordance with Policy SP11. be refused unless it accords with the exceptional reasons identified within the National Planning Policy Framework. If exceptional reasons are justified a suitable compensation including its delivery and ongoing upkeep will need to be secured. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat.</u>'</p> <p>Amend the 5<sup>th</sup> paragraph of the supporting text as follows - '<u>Development should buffer any ancient woodland, ancient and veteran trees it affects by providing sufficient space to afford surrounding protection and allow for future growth and expansion where possible. Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for development. The Council will adopt a precautionary</u></p>



Respondent (with lpr ref)	Response	Council Response
		<p><u>approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.</u></p> <p><u>It is important that a buffer zone consists of semi-natural habitats such as woodland and/or a mix of scrub, grassland, heathland and wetland. Development proposals, including gardens would not be appropriate. Sustainable drainage schemes would only be considered acceptable if they did not affect root protection areas and any changes to the water table did not negatively affect ancient woodland or ancient and veteran trees. The Woodland Trust <a href="http://woodlandtrust.org.uk">planners-manual-for-ancient-woodland.pdf (woodlandtrust.org.uk)</a> highlights the importance of protecting and enhancing natural habitats around ancient woodland in order to help reverse the historic fragmentation of this irreplaceable habitat and to improve ecological connectivity with the surrounding landscape.'</u></p> <p><u>Amend the policy as follows – 'Development proposals will be expected to clearly demonstrate that wherever possible opportunities have been taken for the restoration, enhancement and/or planting of existing trees, woodland and hedgerows and where identified that they have been incorporated into the design and layout of a scheme from the outset. Where this cannot be achieved the onus is on the applicant to justify the loss of trees and/or other features as part of the proposals. The planting of native species will be favoured. Any invasive species on site will be removed.'</u></p>
Pegasus Group for Donnington New Homes (lpr1949)	Objection is raised to this policy as drafted. This Policy is too restrictive in only allowing protected trees to be removed in "exceptional circumstances". It should be amended to allow for the removal of trees where it can be demonstrated that the removal of trees is a) appropriate in the context of a wider development, b) trees proposed for removal are coming to the end of	<p>Comments noted.</p> <p>The premise of the policy is to retain protected trees for that reason, and not to consider them at the outset as a tradeable natural asset.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>their life, and / or c) it can be demonstrated that appropriate, replacement trees can be provided as part of a wider landscaping scheme. The Policy needs to be broadened to allow for the aforementioned eventualities and the following text is suggested as appropriate: '...circumstances where it can be satisfactorily justified and demonstrated that a tree stock of future equivalent type or quality can be incorporated into a development' or similar.</p>	<p>Amend the policy as follows – ‘Development proposals will <u>be expected to clearly demonstrate that wherever possible opportunities have been taken for the restoration, enhancement and/or planting of existing trees, woodland and hedgerows and where identified that they have been incorporated into the design and layout of a scheme from the outset. Where this cannot be achieved the onus is on the applicant to justify the loss of trees and/or other features as part of the proposals. The planting of native species will be favoured. Any invasive species on site will be removed.</u>’</p> <p>The <del>removal of other</del> <u>loss or deterioration</u> of protected trees, groups of trees, woodland or important hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations....’</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC15 Entry level exception schemes

#### (Proposed Submission LPR Policy: DM16 First Homes exception sites)

Number of responses received: 10

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
N/A		
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr235)	We support the policy.	Support noted
Newbury Town Council (lpr2242)	We support this policy. Although the policy is unlikely to be needed in Newbury or Greenham since all land suitable for development is either already allocated for housing or needed for public open space, or protected in some other way from development, it is needed adjacent to many other settlements.	Comments noted
Stratfield Mortimer Parish Council (lpr423)	Do you agree with the proposed policy? Yes	Comments noted
Thatcham Town Council (lpr1417)	Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.	Comments noted. This comment relates to Policy SP17.

Respondent (with lpr ref)	Response	Council Response
	<p>"with those in a designated rural area"</p> <p>It is unclear to us if THA10 is a designated rural area. According to previous definitions it is, and therefore we understand that priority should be given to households with a local connection.</p> <p>It is necessary that this is clarified and that it is defined in policy SP 17.</p>	
Lisa Blake (Greenham Parish Council) (lpr912)	Do you agree with the proposed policy? Yes	Support noted
<b>General consultation bodies</b>		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr606)	Do you agree with the proposed policy? Yes	Support noted
<b>Landowners, site promoters and developers</b>		
Savills on behalf of Englefield Estate Office (lpr1537)	<p>The Annual Monitoring Report 2019 (January 2021) notes the higher than average house prices in the district and thereby emphasises the need for additional affordable housing, particularly for young people and key workers (AMR paragraph 1.11, page 38). Accordingly, it is important that measures are taken to address this need. The general approach of draft LPR Policies DC15 and DC16, to allow entry level exception schemes and rural exception schemes adjacent to settlement boundaries, is therefore supported. This approach will also help to meet rural housing needs and enhance the vitality of rural communities in the district, in line with NPPF paragraph 78, and therefore it is important that a positive approach is taken to considering such schemes.</p> <p>In light of the important contribution that these schemes can make to meeting affordable housing needs and benefiting rural communities, it is considered that draft LPR Policy DC15 should include some allowance for a</p>	<p>Comments noted</p> <p>The policy will be amended. National policy in the recent PPPG and the Written Ministerial Statement on First Homes are now clear that these sites can include a small proportion of market housing if this is considered essential to enable the delivery of First Homes without grant funding. The third bullet point criteria (c) in the Policy, and the supporting text have therefore been amended to reflect this.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>proportion of enabling market housing on entry-level exception schemes where appropriate, as per the approach to rural exception schemes in draft LPR Policy DC16.</p> <p>Draft LPR Policy DC16 and the supporting text set out the requirement for rural exception schemes to meet local housing needs, identified through a local needs survey. Whilst acceptable in theory, there may be additional ways in which local housing need can be demonstrated and the policy would benefit from setting out additional guidance on what evidence should support planning applications. Our experience to date is that the lack of clarity and consistency, as well as onerous expectations relating to housing needs surveys, has been a disincentive to landowners to release otherwise appropriate sites for this type of development. It is also considered that draft LPR Policy DC16 also includes some unnecessary repetition, regarding the need to consider local character and the AONB, which is covered by other LPR policies.</p>	<p>Comments in relation to DC16 (Rural Exception Housing) are considered as part of the Council's response to comments made under that policy.</p>
Sovereign Housing Association Ltd. (lpr2166)	<p>To ensure that the properties remain affordable for future residents suggests a restriction on staircasing, and an implementation of a DPA and threshold on equity for purchasers in these sites? If so, we would want to discuss this in greater detail as this is likely to have an impact on demand and the viability of a site.</p>	<p>Comments noted. Since the draft policy was consulted on, new national policy has been published (Written Ministerial Statement on First Homes) which replaces paragraph 72 of the National Planning Policy Framework. Entry-level exception sites have therefore been replaced with First Homes exception sites. Also New PPG on First Homes has also been published with further guidance on First Homes exception sites.</p> <p>The Council's Executive on the 9<sup>th</sup> June 2022 approved a First Homes Policy Position.</p> <p>West Berkshire Council will assess applications from potential buyers to check they meet the eligibility criteria in the Policy. As well as the national criteria the approved policy position also sets a local connection criteria to ensure that local people in need of affordable housing would be given priority access to First Homes.</p> <p>This includes on First Homes exception sites.</p>
Fowler Architecture & Planning Ltd.	<p>Paragraph 71 of the NPPF does not limit the type of settlement where an entry-level exception can be proposed, except that they should not be</p>	<p>Comments noted. However national policy Written Ministerial Statement on First Homes, and PPG requires</p>

Respondent (with lpr ref)	Response	Council Response
(lpr1797)	<p>permitted within AONBs (as relevant to West Berkshire). The policy unduly restricts the location of entry level exception sites to existing settlements with a settlement boundary. This stipulation must be removed and instead amended to confirm such sites are feasible at all settlements in the spatial areas of Newbury / Thatcham and the Eastern Area.</p> <p>Bullet points 4 and 6 restrict entry level exception sites to local needs. Again, this is inconsistent with the NPPF that confirms the purpose of this policy relate to needs within the local authority's area. While schemes may also be driven by local needs, the strategic District need cannot be ignored and bullet points 4 and 6 should be revised to reflect this – or 'Local' should be defined as the 'District'.</p> <p>While the NPPF envisages provisions should be in place to ensure housing remains at a discount for future eligible households, the blanket approach to remove permitted development rights is unjustified. The Planning Practice Guidance states that the 'blanket removal of freedoms to carry out small scale domestic and non-domestic alterations that would otherwise not require an application for planning permission are unlikely to meet the tests of reasonableness and necessity'.</p>	<p>First Home exception sites to be located adjacent to existing settlements and to be proportionate in size to the scale of those existing settlements.</p> <p>The Written Ministerial Statement and PPG on First Homes also clearly state that First Homes exception sites cannot come forward in areas designated as Green Belt, within the Broads Authority, or in designated rural areas as defined in Annex 2 of the National Planning Policy Framework. In these areas rural exception sites are the sole permissible type of exception site.</p> <p>The designated rural areas as defined in the NPPF, includes National Parks and Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985 where rural exception sites will remain as the sole exception site which can come forward.</p> <p>In West Berkshire most the parish council areas fall within the AONB or are designated rural areas. However, the Newbury and Thatcham parish council areas do not fall within the AONB and are not designated rural areas, First Home exception sites can therefore come forward in Newbury and Thatcham parish council areas, and other non-designated parishes in the Eastern Area.</p> <p>National policy (the Written Ministerial Statement on First Homes) allows local authorities to set local connection criteria. The Council's adopted First Homes Policy Position requires the assessment of applications from potential buyers to check they meet the eligibility criteria in the Policy. The approved Policy sets a local connection criteria to ensure that local people in need of affordable housing would be given priority access to First Homes</p>

Respondent (with lpr ref)	Response	Council Response
		<p>The part of the policy referring to the removal of permitted development rights has been deleted in response to comments.</p> <p>In light of the above the policy has been revised to reflect the latest in National policy and guidance.</p>
Rural Solutions (lpr2304)	Policy DC15 has restricted the Entry Level Housing Schemes to the spatial area of Newbury/Thatcham and Eastern Area. This limited the potential delivery of this type of affordable housing tenure.	<p>Considered and noted, however national policy (the Written Ministerial Statement on First Homes requires First Home exception sites to be located adjacent to existing settlements and to be proportionate in size to the scale of those existing settlements.</p> <p>The Written Ministerial Statement and PPG on First Homes also clearly state that First Homes exception sites cannot come forward in areas designated as Green Belt, within the Broads Authority, or in designated rural areas as defined in Annex 2 of the National Planning Policy Framework. In these areas rural exception sites are the sole permissible type of exception site.</p> <p>The designated rural areas as defined in the NPPF, includes National Parks and Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985 where rural exception sites will remain as the sole exception site which can come forward.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC16 Rural Exception Housing

### (Proposed Submission LPR Policy: DM17 Rural Exception Housing)

Number of responses received: 11

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr161)	Supported when suitable opportunities arise.	Comments noted
On behalf of Shaw-cum-Donnington Parish Council (lpr236)	We support the policy.  ****NOTE for here-on the published text appears to be corrupted by the deletion of spaces making reading difficult.	Comments noted  The formatting will be corrected
Newbury Town Council (lpr2241)	This policy is not applicable to the Newbury settlement area or the rest of Newbury & Greenham.	Comment noted
Stratfield Mortimer Parish Council (lpr424)	Do you agree with the proposed policy? Yes	Comment noted
Greenham Parish Council (lpr914)	Do you agree with the proposed policy? Yes	Comment noted



Respondent (with lpr ref)	Response	Council Response
<b>General consultation bodies</b>		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr609)	We strongly support this policy. It is vitally important that land is set aside at (or near) agricultural value to accommodate families of essential but low paid workers in the rural communities.	Comments noted
David Hill (lpr719)	Changes: The formatting of this text is problematic!	Comment noted. The formatting will be corrected
Ian Parsons (lpr842)	Changes: The formatting of this text is problematic!	Comment noted. The formatting will be corrected
<b>Landowners, site promoters and developers</b>		
Savills for Englefield Estate Office (lpr1538)	<p>The Annual Monitoring Report 2019 (January 2021) notes the higher than average house prices in the district and thereby emphasises the need for additional affordable housing, particularly for young people and key workers (AMR paragraph 1.11, page 38). Accordingly, it is important that measures are taken to address this need. The general approach of draft LPR Policies DC15 and DC16, to allow entry level exception schemes and rural exception schemes adjacent to settlement boundaries, is therefore supported. This approach will also help to meet rural housing needs and enhance the vitality of rural communities in the district, in line with NPPF paragraph 78, and therefore it is important that a positive approach is taken to considering such schemes.</p> <p>In light of the important contribution that these schemes can make to meeting affordable housing needs and benefiting rural communities, it is considered that draft LPR Policy DC15 should include some allowance for a proportion of enabling market housing on entry-level exception schemes where appropriate, as per the approach to rural exception schemes in draft LPR Policy DC16.</p> <p>Draft LPR Policy DC16 and the supporting text set out the requirement for rural exception schemes to meet local housing needs, identified through a</p>	<p>Comments noted</p> <p>This part of the response relates to Emerging Draft LPR Policy DC15 and is addressed in relation to that policy.</p> <p>Local needs surveys are a well-established tool which provide a clear way to assess local housing needs.</p> <p>Agree. The need to consider local character and the AONB is covered elsewhere in the plan and the plan should be read as a whole. Repetitive text will be deleted from the policy as follows – ‘... The affordable housing within the scheme must remain affordable in perpetuity. <del>Schemes will take into account their potential impact on the local character, their relationship with the existing settlement, the wider landscape and whether more sustainable alternatives are available locally. Within the AONB and its setting, the overriding consideration will be</del></p>

Respondent (with lpr ref)	Response	Council Response
	<p>local needs survey. Whilst acceptable in theory, there may be additional ways in which local housing need can be demonstrated and the policy would benefit from setting out additional guidance on what evidence should support planning applications. Our experience to date is that the lack of clarity and consistency, as well as onerous expectations relating to housing needs surveys, has been a disincentive to landowners to release otherwise appropriate sites for this type of development.</p> <p>It is also considered that draft LPR Policy DC16 also includes some unnecessary repetition, regarding the need to consider local character and the AONB, which is covered by other LPR policies.</p>	<p><del>the impact arising from the new development on its setting and special qualities and natural beauty of the landscape. It is expected that....'</del></p>
Sovereign Housing Association Ltd. (lpr2167)	<p>As we are seeking to create balanced communities with a mix of tenures, the likelihood of DPA's in rural areas may limit the desirability &amp; lending criteria for shared owners. As supported by paragraph 77 of the NPPF, in order to support viability and achieve a mix of tenures we would welcome the opportunity to include some homes for open market sale (considered on a case by case basis), as this will offer another option to local residents and help achieve the balance that we seek.</p> <p>We'd welcome an opportunity to become involved earlier in the engagement process to help shape the communities.</p>	Comments noted
Rural Solutions (Karine Giannamore) (lpr2303)	Policy DC16 does allow an element of market housing provision to facilitate the delivery of an affordable housing scheme, however, this should form part of the policy more, rather than rely on the supporting text.	Comments noted, however, the main body of Emerging Draft LPR Policy DC16 (not just the supporting text) does allow for a proportion of market housing where this enables the closing of a funding gap (and this must be evidenced) and where the market homes are integrated with the affordable homes to form a single scheme.

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC17 Self and custom build housing****(Proposed Submission LPR Policy: DM18 Self and custom build housing)**

Number of responses received: 12

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr162)	Self-build homes often bring greater design innovation and self-builder occupant's interest in on-going running (eg heating) costs rather than commercial builder focus primarily on construction costs.	Comments noted
Shaw-cum-Donnington Parish Council (lpr 237)	We support the policy.	Comment noted
Newbury Town Council (lpr2240)	We strongly support this policy.  Reason: see SP 18. Quality of housing is generally higher when designed and built for an end user. We would like to see more publicity given to the policy, because surveys by the national association for self- and custom-built housing show that few people know about these as a separate category and it should be actively promoted.	Comments noted

Respondent (with lpr ref)	Response	Council Response
Stratfield Mortimer Parish Council (lpr425)	Do you agree with the proposed policy? Yes	Comment noted
Greenham Parish Council (lpr915)	Do you agree with the proposed policy? Yes	Comment noted
<b>General consultation bodies</b>		
West Berkshire Green Exchange (lpr1561)	Provision should be made for the sale of a number of serviced plots at a reasonable price on sites of over 30 houses for self build homes. There is a large demand for this but because the major builders monopolise the land supply locally it is very difficult if not impossible for people to purchase a suitable plot. These self build houses often show a quality that is sadly lacking in spec built houses so should be encouraged by the Council.	<p>Comments noted. The supporting text of this policy sets out that large-scale major residential development will be encouraged to provide serviced plots for sale for self and custom-build housing, but this is not a requirement of the policy and therefore it will be removed from the supporting text.</p> <p>The Council has proposed residential allocations in the Plan that will include an element of self-build (North East Thatcham and Purley Rise). It is not considered necessary to have site allocations specifically for self- and custom-build housing in order for this type of development to come forward.</p> <p>Under this policy, applications for self- and custom-build developments will need to demonstrate high quality design and be sensitive to the characteristics of the local area.</p>
<b>Other stakeholders</b>		
Sam Coppinger (lpr322)	Do you agree with the proposed policy? Yes But please put an end to boxy carbuncles on the landscape. The rest of us have to look at them!	Comments noted. Under this policy, applications for self- and custom-build developments will need to demonstrate high quality design and be sensitive to the characteristics of the local area.
Councillor Tony Vickers (lpr610)	We strongly support this policy.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
	<p>The Council should promote the local self-build register more widely and proactively, because self- and custom-build homes have been shown to have higher standards of design and meet the needs of end users significantly better than homes supplied by large national home builders.</p> <p>Changes: Delete the words “Where appropriate” in the last sentence of the policy and insert “proactively” after “The Council will work”</p>	<p>The Council agrees that the Council should work with other parties to address local requirements for self and custom-build homes. However, in some cases the Council won’t need to take a proactive or interventionist role in order for these developments to come forward. Therefore it is considered appropriate to retain the ‘where appropriate’ wording in the policy.</p>
<b>Landowners, site promoters and developers</b>		
Bloor Homes & Sandford Farm (lpr2177)	<p>We agree that this Policy should not require individual development sites, particularly the large sites, to provide a proportion of plots for self and custom build as the persons who aspire to such a housing product are likely to be motivated by the creation of a unique housing product away from rather than part of a new residential community.</p> <p>No information is provided as to the scale of demand for self and custom build housing in the District, however, this will be known to the Council from its Register. The Council may therefore consider it appropriate to identify small site allocations specifically for the purpose of self and custom build housing.</p>	<p>Comments noted.</p> <p>The supporting text of this policy sets out that large-scale major residential development will be encouraged to provide serviced plots for sale for self and custom-build housing, but this is not a requirement of the policy and therefore it will be removed from the supporting text. It is not considered necessary to have site allocations specifically for self- and custom-build housing in order for this type of development to come forward.</p>
Fowler Architecture & Planning Ltd. (lpr1798)	<p>We welcome a policy concerning the promotion of self and custom build development. However, Policy DC17 does not adequately explain the context of the local authority’s self and custom build register and the actual demand for serviced plots in the area. Such evidence within the supporting text will be very useful in clarifying the demand.</p> <p>The policy support for the principle of schemes must be clarified in the context of where such services plots and land will be provided. The assembly of land for self and custom builders must compete with higher land values for standard residential development and as such locational policy incentives must be stated in DC17 to set out a positive framework for this typology of homes to be supported in the countryside, similar to exception sites.</p>	<p>Comments noted.</p> <p>The Council maintains a register of individuals and associations of individuals who have expressed an interest in self- and custom-build homes. Due to privacy reasons it would not be appropriate to publish this list in support of the Local Plan as it contains personal information. However, an indication of current demand and interest, from the register will be set out in supporting evidence to the policy.</p> <p>Noted and considered. However, there is sufficient demand and viability for this development to come forward</p>

Respondent (with lpr ref)	Response	Council Response
	Support for the benefits of self-build should also be extended to small scale or single unit schemes on sites not previously identified as self-build sites.	without additional incentives. Therefore it is considered that no change is needed.
Rural Solutions for Karine Giannmore (lpr2302)	This policy does not go far enough to encourage the delivery of Self and Custom Build Homes. The proposed allocations currently indicated in the emerging local plan are unlikely to meet local needs. People looking to purchase plots for self and custom build housing are unlikely to seek locations within an area that contains large scale major development. It is more akin to small sized developments or village locations.	Comments noted.  However, there is sufficient demand and viability for this development to come forward without additional incentives or allocations. Therefore it is considered that no change is needed.
Shanly Homes (lpr1979)	Full representation on behalf of Shanly Homes, supporting allocation of site at 72 Purley Rise, is attached to representation on RSA12.  Policy DC 17 encourages the provision of self-build housing, however these must be of high-quality design and sensitive to the characteristic of the local area. The outline planning permission seeks to provide 3 self-build/custom-build dwellings. Hence the outline permission complies with the Policy DC 17 of the LRP.	Comments noted.  Under this policy, applications for self- and custom-build developments will need to demonstrate high quality design and be sensitive to the characteristics of the local area

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC18 Specialised Housing

### (Proposed Submission LPR Policy: DM19 Specialised Housing)

Number of responses received: 10

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Hungerford Parish Council (lpr163)	Supports the policy	Support noted
Shaw-cum-Donnington Parish Council (lpr224)	We support the policy.	Support noted
Newbury Town Council (lpr2239)	We support this policy.	Support noted
Stratfield Mortimer Parish Council (lpr426)	Supports the policy	Support noted
Greenham Parish Council (lpr916)	Supports the policy	Support noted
<b>Other stakeholders</b>		
Sovereign Housing Association (lpr2168)	SHA are in broad support of the aims set out in policy DC18. With regards to housing for older people, SHA is developing a Live Well Age Well approach to providing housing options, support and services to help our communities to Live Well. This ties in well with the aims of the local plan and	Comments noted  This policy has been drafted in the context of the Council's Reducing Homelessness & Rough Sleeping Strategy 2020 - 2025

Respondent (with lpr ref)	Response	Council Response
	<p>we would want to work closely with you to develop some local approaches to Ageing Well in West Berkshire.</p> <p>There remains a conflict between fulfilling individual requests for DFG funding – to enable an individual older resident to stay in family sized accommodation - whilst at the same time, there are vacancies in accommodation specifically designed for older people and a demand for family sized homes. We would want to work closely with you to deliver Extra Care and Older Peoples housing schemes to meet the needs of our local ageing population.</p> <p>The draft document references the separate homeless strategy – which talks about providing more small-scale provision for residents with complex needs. How do you see this being achieved? We would see this as linking in with a “tenancy ready” project - assisting applicants to access training and skills. Being proactive in supporting individuals with complex backgrounds, to demonstrate their potential to manage a tenancy. The homeless strategy refers to the need for increased move-on accommodation from supported housing - how is this being considered?</p> <p>Through our Thriving Communities strategy 2020-24 vision we identified Employment and Training, Money and Digital and supporting communities as key priorities. Our youth offer includes a youth voice panel to help young people shape services and improve communities where they live. We would be keen to work with you in these.</p>	
Councillor Tony Vickers (lpr611)	Supports the policy	Support noted
<b>Landowners, site promoters and developers</b>		
Feltham Properties (lpr2283)	<p>The Updated Housing Needs Assessment (dated, May 2020) prepared by Icenl (on behalf of the Council) demonstrates a projected growth in those aged 65 and over of 14,500 persons over the 2018-36 period, representing 49% growth in West Berkshire. This forms part of the national picture which is described as “critical” in national policy guidance (National Planning Policy Guidance Paragraph 001 Reference ID: 63-001-20190626).</p>	<p>Comments noted</p> <p>The Policy and supporting text has been amended to clarify that the need implies locally identified need in the whole District.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Evidence locally and nationally, therefore, demonstrates that there is a significant need for housing for older persons (i.e. specialist housing units and care/nursing beds) in West Berkshire during the plan period.</p> <p>In which case, emerging Policy DC18 is not sufficiently positive to ensure that this problem is addressed. We have concerns that the policy requires evidence that each individual scheme meets a ‘proven locally identified need’ for that specific housing product to be supported by the Council. The Council’s approach is clearly flawed as the evidence base already demonstrates that there is a significant need for specialist housing for older persons during the plan period. The Policy therefore adds another onerous and unnecessary step to the process that may impede delivery of schemes for older persons accommodation.</p> <p>With the above in mind, it is considered that the Council needs to remove the requirement for evidence of a local need within Policy DC18. The Policy should positively encourage development for specialist accommodation for older persons in areas with good access to public transport and local facilities and services.</p>	<p>It is considered that Proposed Submission LPR revised Policies SP18 (Housing Type and Mix) and DM19 (Specialized Housing) are positive and encourage the provision of all types of specialist housing to meet the requirements of older people. Policy SP18 now requires all housing development to meet the needs of the elderly and disabled. All new homes to be built to the accessible and adaptable dwellings (Part M4(2)) of the Building Regulations standard with some meeting the needs of wheelchair users.</p> <p>Policy SP18 now outlines how the accommodation needs of older people are expected to be met during the plan period.</p>
Turley on behalf of A2dominion Housing Group Ltd (lpr1499)	<p>A2Dominion welcome the provision of a policy which provides for specialist housing. The context of this is seen in the National Planning Practice Guidance (NPPG Housing for Older and Disabled People, paragraph 63-001-20190626) which states:</p> <p>“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”</p> <p>A2Dominion note that nationally there is an ageing population. The West Berkshire Strategic Housing Market Assessment (‘SHMA’) published in 2016</p>	<p>Comments noted</p> <p>It is important that housing schemes reflect the local needs. The updated evidence in the West Berkshire Local Housing Need Assessment Reports 2020 and 2022 set out the evidence on local needs for specialised housing at a district level. This has been clarified in the additional and amended text.</p> <p>The level of need for specialist housing for older people in the District is now considered in the supporting text to the Policy.</p> <p>Explanation of how the need for specialist housing to meet the needs of the old age population is explained in proposed amendments to policies SP19: Affordable</p>

Respondent (with lpr ref)	Response	Council Response
	<p>confirmed that West Berkshire had the highest representation of older people amongst those authorities in its HMA as of 2013 (GL Hearn (2016) Berkshire (including South Bucks) Strategic Housing Market Assessment, Table 109).</p> <p>A review of population estimates released by the ONS confirms that this remains the case. As shown at Table 4.1 below, the latest data confirms that nearly one in five West Berkshire residents (19%) were aged 65 or above in 2018, while 8% were aged 75 and over. (Table sourced from ONS appears as Table 3.1 in full representation)</p> <p>The Council's updated Housing Needs Evidence (May 2020) equally addresses the ageing demographic profile of West Berkshire when it states: "West Berkshire is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by 49% over the 18-years to 2036. This compares with overall population growth of 7% and a modest decrease in the Under 65 population of 2.5%."</p> <p>A2Dominion note the Council set out in the additional text for Policy DC18 stating that 'All specialist housing provision within the built-up area should meet an identified unmet need in the local area proposed for development and the location must be appropriate having regard to access to facilities, services and public transport.' The text is not clear on whether specialised accommodation in a built-up area could also meet unmet need elsewhere and not just 'identified unmet need in the local area'. We suggest the text is made clearer to inform whether a specialised housing scheme could meet unmet need from elsewhere in the District.</p> <p>The need for specialised housing is set out in the Council's evidence base, but it is not clear what the Council considers the definition of 'local need' to be. Given the evidence of an ageing population in the District, A2Dominion consider that it would be a flawed approach to only permit development where a 'local need' is demonstrated. We note that the approach advocated by A2Dominion in this regard is the same as that supported by the Inspector who examined the Hart Local Plan – that need is a matter which should be based at the District level.</p>	<p>Housing; SP18: Housing Type and Mix as well as Proposed Submission LPR Policy DM19 Specialist Housing. The amendments outline the requirements which will be expected from developments in order to meet the needs of the elderly and disabled for all new homes to be built to the accessible and adaptable dwellings (Part M4(2)) of the Building Regulations standard with some meeting the needs of wheelchair users.</p> <p>Policy SP18 now outlines how the accommodation needs of older people are expected to be met during the plan period.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Similarly, it is evident that despite the compelling evidence of the ageing population, the Local Plan does not include any explanation as to the level of that need.</p> <p>During the examination of the Vale of Aylesbury Local Plan (VALP) the inspector expressed that the Plan was unsound because it did not meet the current needs of specialised housing for older people. Subsequently, the Council had to revisit its Local Plan and submit further documentation which addressed the need. We suggest that West Berkshire avoids the same situation by addressing the need clearly following Regulation 18 consultation.</p> <p>Whilst there is support for general presumption in Policy DC18, there are no specific allocations for this type of development and we have already expressed the concerns over the internal inconsistencies of the Plan which likely to complicate or fetter the delivery of schemes to meet this identified need. Therefore, unless schemes for this type of development are brought forward on a speculative basis, the 'identified need' is likely to go unmet. The Council should revisit this, address inconsistency and identify specific allocations for this type of development in order to address need.</p> <p>We welcome fact that there has been an identified need for specialised housing within West Berkshire. A2Dominion have historically promoted the site east of Reading Road for residential development. However they acknowledge that a scheme for specialised accommodation could also provide suitable development in Streatley.</p>	
Turley on behalf of Pangbourne College (lpr2352)	<p>Pangbourne College welcomes the provision of a policy which provides for specialist housing, in particular given the guidance within the National Planning Practice Guidance (NPPG) which states:</p> <p>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is</p>	<p>Comments noted.</p> <p>The accommodation needs of an ageing population has been an important consideration in the housing need assessments and in policy formulation from the early stages.</p> <p>The SHMA, 2016 and Local Housing Need evidence updates 2020 and 2022 have assessed the needs of different groups, including the elderly on a West Berkshire District level basis.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>something to be considered from the early stages of plan-making through to decision-taking.”</p> <p>The Council’s updated Housing Needs Evidence (May 2020) addresses the ageing demographic profile of the District. It states:</p> <p>“West Berkshire is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by 49% over the 18-years to 2036. This compares with overall population growth of 7% and a modest decrease in the Under 65 population of 2.5%.”</p> <p>In the supporting text to Policy DC18 the emerging plan refers to “identified unmet need in the local area” but it is not clear what the Council considers the definition of ‘local need’ to be. Given the evidence of an ageing population in the District, it would not appear justified to only permit development where a ‘local need’ is demonstrated.</p> <p>Whilst the College supports the general presumption in Policy DC18, there are no specific allocations for this type of development. We feel that this should be reviewed with the potential to include sites to deliver specialist housing, and in particular older person accommodation, considered.</p>	<p>In relation to the provision of accommodation to meet the needs of the old age population amendments have been made to Policies SP19: Affordable Housing; SP18: Housing Type and Mix as well as Proposed Submission LPR Policy DM19 Specialist Housing. The amendments outline the requirements which will be expected from developments in order to meet the needs of the elderly and disabled for all new homes to be built to the accessible and adaptable dwellings (Part M4(2)) of the Building Regulations standard with some meeting the needs of wheelchair users.</p> <p>Policy SP18 now outlines how the accommodation needs of older people are expected to be met during the plan period.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC19 Gypsies, Traveller and Travelling Showpeople****(Proposed Submission LPR Policy: DM20 DC19 Gypsies, Traveller and Travelling Showpeople**

Number of responses received: 12

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Reading Borough Council (lpr1491)	<p>The position regarding whether the Draft Local Plan meets the identified need for gypsy and traveller accommodation is not clear. Paragraph 11.24 states that identified need for permanent pitches by 2036 from the Gypsy and Traveller Accommodation Assessment (GTAA) is 48 (under Planning Policy for Traveller Sites definition) or 51 (cultural need) pitches. However, the only additional site allocated to meet a need is for 8 pitches at New Stocks Farm (RSA32), and this in itself would result in a reduced transit provision. The Local Plan argues that the GTAA factors in the high turnover at Paices Hill, and this reduces the need to 19 (PPTS) or 21 (cultural) pitches. The GTAA is unpublished, so we are not able to view the details of this calculation. Even so, a shortfall of around 20 pitches appears to arise in the Local Plan. RBC believes that it is essential that the Local Plan should make provision to accommodate West Berkshire's full need for gypsy and traveller pitches.</p> <p>In addition, as has been previously raised, RBC has an unmet need for permanent gypsy and traveller pitches. Our own GTAA identified a need for 10-17 permanent pitches in Reading, and, despite considerable efforts to</p>	<p>Comments noted. The GTAA has been refreshed, and available on the Council's website. The plan period (to 2037) need reduces to 20 pitches. Accounting for the allocation at Paices Hill, Aldermaston, this need reduces to 12 pitches. No sites have been identified through the Regulation 18 consultation, which included a question as to whether any land was available for Gypsy and Traveller pitches. Sites coming forward through the development management process could assist in achieving numbers, and this is one reason for proposing this policy. The Council are looking at options to meet its own permanent need, through a Development Plan Document.</p> <p>It is unlikely that West Berkshire would be able to aid in meeting the permanent need for Reading, at least in the short term. This will continue to be monitored as the GTAA is refreshed and the Local Plan is reviewed.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>identify possible sites, the Reading Borough Local Plan was unable to find suitable land, due to the nature of the Borough. On 21<sup>st</sup> February 2018, RBC made a request under the duty to Co-operate to a number of authorities, including WBDC, to understand whether there is potential to meet these permanent needs outside Reading's boundaries. At the time it was understood that WBDC was not yet in a position to know whether this was possible and was assessing its own needs. However, in drawing up this version of the Local Plan, more progress on understanding needs and capacity has been made. The Local Plan should recognise that there are unmet needs from Reading, and RBC would want to discuss the opportunities for helping to meet these needs in more detail. In doing so, RBC would welcome a discussion about what resources would be required to help meet these needs.</p>	
<p>Wokingham Borough Council (lpr1469)</p>	<p>The West Berkshire District Gypsy and Traveller Accommodation Assessment 2019 (GTAA) identifies the need for additional pitches over the period 2018/19 to 2035/36. Though the GTAA has not yet been published, its findings are set out in the Plan. The GTAA identifies the need for 'cultural' Gypsy and Travellers and a separate need for Gypsy and Travellers who meet the definition set out in the Planning Policy for Traveller Sites (PPTS)1. It also identifies a separate need for Travelling Showpeople. The overall need over the plan period is for 51 pitches for 'cultural' and 48 pitches for PPTS Gypsies and Travellers (i.e. 99 pitches in total) and 24 plots for Travelling Showpeople. Paragraph 11.30 states that the GTAA recommends that turnover at a private Gypsy and Traveller site in Paices Hill should be factored into supply with the effect that this reduces pitch need significantly to 22 and 19 pitches for 'cultural' and PPTS Gypsies and Travellers respectively. It is noted that WBC's own GTAA, produced by the same consultants, outlined how need might be reduced if turnover on public sites was factored in i.e. those sites over which WBC has control over occupancy. However, its final recommendation was that needs should be planned for in full without an allowance for turnover included. WBC wishes to understand the evidence behind the recommendation in WBDC's GTAA and considers that very clear evidence would be required to justify such a reduction in need, particularly</p>	<p>Comments noted. The GTAA has been refreshed, and the 2019 and 2021 documents are available on the Council's website.</p> <p>The plan period (to 2037) need reduces to 20 pitches. Accounting for the allocation at Paices Hill, Aldermaston, this need reduces to 12 pitches. No sites have been identified through the Regulation 18 consultation, which included a question as to whether any land was available for Gypsy and Traveller pitches. Therefore, it is proposed to rely on the sites allocated in the Housing Site Allocations being rolled forward to the Local Plan and for the development management process. The Council are looking at options to meet its own permanent need, through a Development Plan Document.</p> <p>The refreshed GTAA 2021 comments that there is a reduction in the number of households planning to move at Paices Hill and very limited turnover is expected. The refreshed GTAA 2021 therefore does not make an allowance for turnover on Paices Hill.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>as it would relate to a private site where occupancy is not managed by the council.</p> <p>The Plan also states that an existing council run site (Four Houses Corner), which the GTAA identifies as containing 7 occupied pitches, is planned for refurbishment /redevelopment. It is not clear whether this would comprise redevelopment to an alternate use or whether it might allow for additional pitches to be delivered.</p> <p>It is understood that the remaining need for pitches will be met through the planning application process, with proposals assessed against the criteria set out in Policy DC19. This would require a significant amount of need to be met through windfalls.</p> <p>It is recommended that WBC seeks clarification regarding the evidence used to justify the turnover allowance and associated reduction in need. It is further recommended that WBC seek clarification over the deliverability of the proposed site allocation for additional pitches at Paices Hill, the impact of this proposed allocation on transit pitch need, and over the potential additional capacity (if any) that could be accommodated at the Four Houses Corner council run site. WBC expects WBDC to meet its Gypsy and Traveller need in full for the whole plan period to 2037, which may require additional sites to be identified and allocated.</p> <p>WBC seeks clarification regarding the evidence used to justify the turnover allowance and associated reduction in need. WBC seek clarification over the deliverability of the proposed site allocation for additional pitches at Paices Hill, the impact of this proposed allocation on transit pitch need, and over the potential additional capacity (if any) that could be accommodated at the Four Houses Corner council run site. WBC expects WBDC to meet its Gypsy and Traveller need in full for the whole plan period to 2037, which may require additional sites to be identified and allocated.</p>	<p>Four Houses Corner is not able to accommodate any additional pitches due to on-site conditions. 17 pitches would be made available following refurbishment, an increase of one pitch over and above the previous number of pitches prior to the temporary closure.</p> <p>The refreshed GTAA 2021 highlights an interview with the site owner of Paices Hill, demonstrating that the site is deliverable. There is a commitment from the site owner to convert the existing transit pitches to permanent pitches. This does mean that transit need provision would reduce. The refreshed GTAA 2021 outlines recommendations for transit/stopping needs, which the Council is exploring, through a Development Plan Document.</p>
Basingstoke and Deane Borough Council (lpr1484)	The draft Plan also sets out the council's strategy for meeting gypsy and traveller needs, including through the replacement of transit pitches with permanent pitches at New Stocks Farm on Paices Hill (Policies DC19 and RSA32). Although Policy DC19 states that 'The Council will meet the identified need... by allocating land for plots and/or pitches' it appears that	Comments noted. The GTAA has been refreshed, and the 2019 and 2021 documents are available on the Council's website. The plan period (to 2037) need reduces to 20 pitches, taken from the refreshed GTAA 2021. Accounting for the

Respondent (with lpr ref)	Response	Council Response
	<p>there would still be an overall shortfall in pitches (as explained in para 11.30). BDBC wishes to ensure that WBC has a robust strategy to meet its gypsy and traveller needs in full to ensure that those needs would not need to be met in Basingstoke and Deane.</p> <p>BDBC is keen to continue to engage in suitable discussions under the Duty to Cooperate, in relation to the issues set out above and those discussed at our meeting in late 2020.</p>	<p>allocation at Paices Hill, Aldermaston, this need reduces to 12 pitches. No sites have been identified through the Regulation 18 consultation, which included a question as to whether any land was available for Gypsy and Traveller pitches. Sites coming forward through the development management process could assist in achieving numbers. The Council are looking at options to meet its own permanent need, through a Development Plan Document.</p>
Vale of White Horse & South Oxfordshire District Councils (lpr1779)	<p>At Vale of White Horse District Council, we are committed to working collaboratively with our neighbouring authorities. Thank you again for the opportunity to review your consultation document and we hope that a positive working relationship between the two councils continues as you progress with your Local Plan Review to 2037.</p>	<p>Comments noted.</p>
South Oxfordshire District Council (lpr1784)	<p>We note the future shortfall in gypsy and traveller pitch provision identified in paragraph 11.30 and will look forward to understanding how this will be addressed through future versions of the Plan.</p>	<p>Comments noted. The GTAA 2021 update records a reduced need of 20 pitches across the plan period, further reducing to 12 pitches when including the allocated site at Paices Hill. The Council are looking at options to meet its own permanent need, through a Development Plan Document.</p>
Hungerford Town Council (lpr164)	<p>Agree with the proposed policy.</p>	<p>Comments noted.</p>
Shaw-cum-Donnington Parish Council (lpr245)	<p>We support the policy. We have difficulty understanding how the needs have been assessed and are concerned that an over-provision of sites could prove an attraction.</p>	<p>Comments noted. The GTAA is available on the website. It is the intention that the Council will seek to meet the needs of Gypsies and Travellers as identified in the GTAA, through a Development Plan Document and thus will not be in a position to over-supply sites.</p>
Stratfield Mortimer Parish Council (lpr427)	<p>Agree with the proposed policy.</p>	<p>Comments noted.</p>



Respondent (with lpr ref)	Response	Council Response
Greenham Parish Council (lpr917)	Agree with the proposed policy.	Comments noted.
Newbury Town Council (lpr2238)	We support this policy apart from the inclusion of the need to be on previously developed land which we feel is not at all necessary. Whilst desirable, the words “previously developed” [land] should be prefaced by “high quality agricultural or public open space (or access) – or (preferably) -”.	The Planning Policy for Traveller Sites and the NPPF support the use of brownfield/previously developed land for development, including that for gypsy and traveller pitches. It is considered appropriate to seek to direct gypsy and traveller pitches to previously developed land where possible.
<b>General consultation bodies</b>		
Canal and River Trust (lpr897)	<p>Does not agree with the policy DC19.</p> <p>It is noted that the GTAA does not appear to have considered the need for boat travellers. Although the eastern end of the canal is generally quieter that the west end, there are several places which are increasing popular with liveaboard boaters especially where there are good transport connections (in most cases right next to the canal). Newbury, Aldermaston, Thatcham and Hungerford all offer liveaboard boaters access to local services and facilities.</p> <p>Policy DC19 would need amending if it is decided that there is a recognised need to provide residential moorings for liveaboard boaters. This matter would require further discussion with the Canal &amp; River Trust. It should be noted that the Trust will not comment on the need for such development, but will consider possible locations and amendment to the policy if necessary.</p>	<p>The GTAA does not identify a need for boat travellers. Many of the existing moorings are for leisure purposes, and it is not proposed to seek to provide sites for residential moorings.</p> <p>It is proposed to add the following sentence to the supporting text (when discussing need): <u>‘The GTAA does not identify a need for houseboat dwellers, and thus the LPR does not provide for any permanent houseboats.’</u></p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr612)	Agree with the proposed policy.	Comments noted.
<b>Landowners, site promoters and developers</b>		
NA		

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC20 Retention of mobile home parks****(Proposed Submission LPR Policy: DM21 Retention of mobile home parks)**

Number of responses received: 6

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
N/A		
<b>Statutory consultees</b>		
On behalf of Shaw-cum-Donnington Parish Council	We support the policy. No doubt some people like to live on such parks but on the other hand it is a form of affordable housing and a reflection on the need for affordable accommodation.	Comments noted
Newbury Town Council (lpr2237)	We support this policy.	Comment noted
Stratfield Mortimer Parish Council (lpr428)	We support this policy.	Comment noted
Greenham Parish Council	We support this policy.	Comment noted
<b>General consultation bodies</b>		
N/A		

Respondent (with lpr ref)	Response	Council Response
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr613)	We strongly support this policy.	Comment noted
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning Ltd (lpr1799)	The justification for this policy is not clear to demonstrate why explicit safeguarding is needed in the development plan. If such sites are considered to provide low-cost home ownership accommodation, then their redevelopment should not be restricted to 100% affordable housing as this is more restrictive than existing terms of operation. Instead any redevelopment should provide equivalent accommodation in terms of the size, range and tenure of housing, which may not itself be affordable housing as defined by the Framework.	Comments noted, however there is a need to ensure that these sites which currently provide low-cost accommodation continue to provide affordable accommodation.

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC21 Residential use of space above shops and offices

### (Proposed Submission LPR Policy: DM22 Residential use of space above non-residential units)

Number of responses received: 8

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr165)	Supports the policy	Comment noted
Shaw-cum-Donnington Parish Council (lpr247)	We support the policy. We do oppose the conversion of modern office blocks to residential use as these buildings often lead to substandard accommodation in inappropriate areas.	Comments noted
Newbury Town Council (lpr2236)	We support this policy. However more consideration needs to be given to the need for storage of cycles and bins, possibly on a communal basis.	Comments noted. Policies DM42 and DM44 (and the supporting text of policy DM31) set out the expectations for cycle parking and storage as part of residential development. Elsewhere in the plan (at Policy SP7) the requirements for the provision of waste storage are already set out and there is no need to repeat them in this policy.
Stratfield Mortimer Parish Council (lpr429)	Supports the policy	Comment noted

Respondent (with lpr ref)	Response	Council Response
Greenham Parish Council (lpr920)	Supports the policy	Comment noted
<b>General consultation bodies</b>		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr618)	<p>We support this policy but wish to see a requirement to consider provision for cycle parking and bin storage.</p> <p>These proposals are likely to come forward in locations where parking is at a premium. They should not be excluded from the usual requirement for parking and bin storage, although it is unlikely that parking for vehicles will be deemed necessary under parking policy.</p> <p>Add a new paragraph: "Where possible, provision should be made for bin storage and secure cycle parking."</p>	<p>Comments noted. Policies DM42 and DM44 (and the supporting text of policy DM31) set out the expectations for cycle parking and storage as part of residential development. Elsewhere in the plan (at Policy SP7) the requirements for the provision of waste storage are already set out and there is no need to repeat them in this policy.</p>
<b>Landowners, site promoters and developers</b>		
Sovereign Housing Association (lpr2169)	<p>SHA support the Councils presumption in favour of proposals related to the space above shop units providing a net increase in housing. It is import the plan makes provision for a variety of housing needs from a mixture of urban, suburban and greenfield sites. The council's strategy to create a vibrant Town Centre will need to consider and support the idea of town centre living where this can be delivered sustainably and integrated into the town with suitable amenity for residents.</p>	Comments noted
Fowler Architecture and Planning Ltd. (lpr1800)	<p>The broad commitment in Policy DC21 of a presumption in favour is welcomed, however policies must be clearly written and unambiguous, so it is evident how a decision maker should react. What does a presumption in favour mean in practice and what weight should be afforded to this presumption when undertaking the planning balance? It would be clearer to state within Policy DC21 (rather than just refer within the supporting text) that certain standards, such as parking and amenity, will not be slavishly applied in order to reflect the challenges of effectively utilising upper floors within the constraints of each site.</p>	<p>Comments noted.</p> <p>The policy will be amended to be clearer about the standards that must be met. National policy and legislation sets out requirements that planning applications for the conversion of non-residential space to residential use must comply with, and the policy will be amended to reflect this as follows -</p>

Respondent (with lpr ref)	Response	Council Response
		<p><del>'DM22 – Residential use of space above <u>non-residential units-shops and offices</u></del></p> <p><del>There is a presumption in favour of</del> <u>The Council will support proposals related to the conversion of existing space or provision of additional space above non-residential <del>shop</del> units that provide a net increase in housing and:</u></p> <ul style="list-style-type: none"> <li>• <u>are consistent with the prevailing height and form of neighbouring properties and the overall street scene; and</u></li> <li>• <u>are well designed and meet the appropriate space standards; and</u></li> <li>• <u>maintain safe access and egress for occupier.</u></li> </ul> <p><u>Where the proposal relates to the addition of residential space or the conversion of existing non-residential space to residential space under permitted development rights, the development should:</u></p> <ul style="list-style-type: none"> <li>• <u>be well designed and meet the appropriate space standards; and</u></li> <li>• <u>meet the conditions and limitations of the Town and Country Planning (General Permitted Development) Order 2015 (as amended), including the need to apply for Prior Approval.'</u> </li></ul>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC22 Rural Workers Dwellings****(Proposed Submission LPR Policy: DM23 Housing relating to rural workers)**

Number of responses received: 9

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr921)	Supports the policy	Comments noted
Hungerford Town Council (lpr166)	Supports the policy	Comments noted
Newbury Town Council (lpr2235)	<p>This policy is not applicable to Newbury or Greenham although many “rural workers” are currently living in the Newbury settlement area and we support it.</p> <p>However, as: “The Council is responsible for the local highway, cycle and walking, and public right of way networks as well as supporting public transport networks..... All development proposals will be required to demonstrate that they do not adversely affect these networks or that they can mitigate the adverse impact.”, we would like to add: “In the case of active travel networks, we wish to see opportunities to enhance them adopted. We expect all major development proposals to demonstrate how they have considered ways of improving local permeability into, out of and through their developments.”</p>	<p>Comments noted.</p> <p>Applications will be assessed in consideration of this policy as well as any other relevant policies, including transport infrastructure and travel planning, as well as taking into account the Local Transport Plan. However, it should be noted that dwellings for rural workers are, in most cases, small scale schemes, being one dwelling. This is not major development, and it is not envisaged to be large scale developments needing major upgrades/changes to the site.</p>

Respondent (with lpr ref)	Response	Council Response
Shaw cum Donnington Parish Council (lpr248)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr430)	Supports the policy	Comments noted
<b>General consultation bodies</b>		
British Horse Society (lpr861)	Nationally, the horse industry is the second biggest land-based industry (LANTRA) and rural West Berks is no exception. Considering the importance put on the horse industry in other parts of the LPR, it should be specified here	<p>Comments noted.</p> <p>It is recognised that the horse industry forms an important part of West Berkshire's landscape and economy. Emerging Draft LPR Paragraph 11.47 and 11.48 in the supporting text relates specifically to the equestrian and racehorse industry, and outlines that the policy should be read in conjunction with Emerging Draft LPR policy DC34 (Submission version policy DM37). The first criterion of the policy therefore is applicable for equestrian development not related to the racehorse industry.</p> <p>Criterion a) reads as follows to account for the change - 'It is proven as essential to the continuing use of land and buildings for agriculture, forestry or a <u>similar land based rural enterprise</u>;</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr619)	We support this policy but would like a minor amendment to ensure that new housing in this category remains occupied by a working family in perpetuity. When an estate worker retires, currently their licence to occupy the property is not removed. In some cases, the dwelling was permitted for the exclusive use of a particular kind of employee (e.g. a security guard at/near an estate entrance). When a security guard retires or dies, this particular dwelling may no longer serve the purpose for which it was permitted if he or his dependents remain in it. The Council should be able to require the owner to	<p>Comments noted. It is the case that a dwelling with an agricultural tie will remain in use for those employed, or last employed, in agricultural or forestry, or a widow or widower of such a person and any resident dependents. Any new dwelling on the land will require permission, and be subject of this policy to assess its appropriateness.</p> <p>Planning case law shows that it may not be reasonable to force a retiring rural worker, or his/her widow/widower to</p>



Respondent (with lpr ref)	Response	Council Response
	<p>re-house the employee's dependent family, thus enabling a new security guard (in this example) to occupy the dwelling.</p> <p>In the Armed Forces, there is no right for an ex-service person to remain in occupation of their home. The same should be the case in some circumstances with non-Service occupants of homes in rural areas that were given planning consent for a particular reason.</p> <p>We are unsure how this can be incorporated in planning policy but suggest supporting text could refer to it and make some provision.</p> <p><b>11.37</b> The rural economy plays an important role in the District, in providing employment and in managing the rural landscape. The Council encourages viable agricultural, forestry, <b>equestrian</b> and other rural enterprises that support the delivery of a wide range of public benefits and sees them as essential to the maintenance of a thriving rural economy.</p>	<p>move out to provide the property to an active worker. The planning policy will not stipulate whether a planning condition with such detail (of dependents, widow/widower, etc) will be required, and this will be ultimately up to the decision maker, taking into account the merits of the case.</p> <p>It is difficult for the planning policy, and indeed for decision makers, to require the re-homing of an employee's dependent family. Changes to the supporting text would not necessarily deal with this issue as if the retired rural workers were rehomed this would not necessitate the need for a new dwelling. However, as part of any evidence to be submitted in support of an application for a new dwelling, paragraph 12.48 will be amended as follows:  <u>'Suitable alternative buildings that should be considered before creating a new dwelling unit, are existing vacant residential buildings or buildings suitable for conversion to residential use. Applicants should detail in their planning submission whether it is possible for the retired rural worker/their dependents/their widow or widower to be housed in alternative existing accommodation, thus allowing the existing residence to be used for the incoming rural worker.'</u></p> <p>It is recognised that the horse industry forms an important part of West Berkshire's landscape and economy. Emerging Draft LPR Paragraph 11.47 and 11.48 in the supporting text relates specifically to the equestrian and racehorse industry, and outlines that the policy should be read in conjunction with Emerging Draft LPR Policy DC34 (Submission version policy DM37). The first criterion of the policy therefore is applicable for equestrian development not related to the racehorse industry.  Criterion a) reads as follows to account for the change -</p>

Respondent (with lpr ref)	Response	Council Response
		'It is proven as essential to the continuing use of land and buildings for agriculture, forestry or a <u>similar land based rural enterprise</u> .'
<b>Landowners, site promoters and developers</b>		
Lucy White Planning for Bradfield College (lpr1156)	<p>Bradfield College objects to the ambiguous nature of policy DC22. Paragraph 11.38 advises that Policy DC22 applies to schools and colleges in the rural areas, for the provision of staff accommodation. However, it also acknowledges that not all criteria of policy DC22 would apply. It states: <b>“In such instances it is acknowledged that buildings currently being used for tourist or temporary accommodation are unlikely to be appropriate when seeking the availability of suitable alternative dwellings in that location. The Council is also unlikely to ask for proof of financial viability.”</b></p> <p>The text does not clarify whether all other policy criteria would be applied to schools and colleges. If the remaining policy criteria are applicable, Bradfield College objects on the following basis:</p> <p>Criteria i) requires evidence to demonstrate that the staff accommodation is proven to be essential to the ongoing use. This indicates that evidence would need to demonstrate that the enterprise concerned would no longer be viable unless the proposed staff accommodation was provided. Whilst this may be appropriate for smaller scale rural businesses, such as agricultural and forestry based activities, it is unlikely to apply to independent schools and colleges.</p> <p>The rationale behind the provision of staff accommodation for schools and colleges is based on factors beyond overall viability, including the need:</p> <ol style="list-style-type: none"> <li>1. For staff to be resident on the school/college campus to provide out of hours tuition and to be on call for out of hours emergencies; and</li> <li>2. To provide pastoral care for pupils throughout the weekday, evenings and weekends.</li> </ol> <p>The authority for such is contained within the Income Tax (Earnings and Pensions) Act, which recognises the need for staff accommodation at boarding schools. It states:</p> <p><b>“99 Accommodation provided for performance of duties</b> (1) living accommodation provided for an employee if it is necessary for the</p>	<p>Comments noted.</p> <p>The policy attempts to place elements of Local Plan policy ENV27 (Development on existing institutional and educational sites in the countryside) into the policy on housing for rural workers, as it is recognised that schools in the countryside have a housing stock for staff and schemes for new staff accommodation. It is agreed that some ambiguities have resulted in the merging of such policies.</p> <p>DM38 (development on existing educational and institutional sites in the countryside) has been included in the Submission Version, and would replace Local Plan policy ENV27.</p> <p>Delete the second paragraph (emerging plan version 11.39) in the supporting text as follows: <del>‘There are a number of existing educational and institutional establishments within the rural area of West Berkshire. This policy will be applied for new housing associated with these uses (e.g. staff accommodation). In doing so, the Council recognises that not all of the criteria set out in the policy may be relevant. In such instances it is acknowledged that buildings currently being used for tourist or temporary accommodation are unlikely to be appropriate when seeking the availability of suitable alternative dwellings in that location. The Council is also unlikely to ask for proof of financial viability. The Council will, however, normally require applicants for such</del></p>

Respondent (with lpr ref)	Response	Council Response
	<p>proper performance of the employee’s duties that the employee should reside in it.</p> <p>(2) living accommodation provided for an employee if—</p> <p>(a) it is provided for the better performance of the duties of the employment, and</p> <p>(b) the employment is one of the kinds of employment in the case of which it is customary for employers to provide living accommodation for employees.</p> <p><b>Section 99(2) ITEPA 2003</b></p> <p>You can accept the following classes of employee get the living accommodation exemption available under Section 99(2) ITEPA 2003</p> <ul style="list-style-type: none"> <li>• in boarding schools where staff are provided with accommodation on or near the school premises</li> <li>• head teacher</li> <li>• other teachers with pastoral or other irregular contractual responsibilities outside normal school hours (for example house masters)</li> <li>• bursar</li> <li>• matron, nurse and doctor.”</li> </ul> <p>Taking these factors into account, a failure to secure new staff accommodation beyond the settlement boundaries is unlikely to result in the establishment becoming unviable and ceasing to operate, but it could compromise its operations, inhibit its ability to enhance its pastoral care and safeguarding obligations (responding to changes in the regulations for boarding schools), increase running costs and reduce its ability to compete with other independent schools and colleges nationally which may be better equipped to attract staff of a high calibre and excellent pastoral care.</p> <p>In the case of Bradfield College, it is important to attract and retain staff who can offer high standards of education and pastoral care. As a full boarding school, with over 800 pupils, operating weekend and evening programmes, the College’s policy is to house all teaching staff and staff responsible for the health, safety and security of pupils and residents within Bradfield. The College has to attract the best teaching staff from all regions of the country and the provision of staff accommodation is essential to that aim. Teachers’ salaries alone do not typically allow them to live in such a high housing cost area. The College is a prominent local business employing around 500 staff,</p>	<p><del>development to enter into a legal agreement to ensure that it remains ancillary to the main use of the site and to ensure that staff accommodation is not sold off separately to be followed by applications for further housing or residential accommodation. For all other proposals related to educational and institutional establishments policy DC32 will be applicable.</del></p> <p>In terms of criterion vii) the impact on the AONB is a significant factor in assessing the impact of development. The Local Plan is landscape led, and this is reflected in Local Plan Policy SP2, to consider the landscape in all development proposals.</p> <p>Amend the policy to refer to compliance with Policy SP2 as follows:</p> <p><del>‘(g) The development has no adverse impact on the rural character and heritage assets of the area and its setting within the wider landscape, and is in accordance with Policies SP2 and SP7. Where it affects the AONB the impact on its special qualities and natural beauty of the landscape will be the overriding consideration;’</del></p>

Respondent (with lpr ref)	Response	Council Response
	<p>including part-time and full-time staff, around 100 seasonal staff and 150 support staff.</p> <p>The demands placed on teaching staff continue to increase as the regulatory requirements and expectations in relation to Health and Safety, Security and Child Protection are raised. ISI Inspections have made clear the importance of staff devoting as many hours as possible towards pupils achieving the highest levels of education and pastoral care. This is unattainable when teaching staff live off campus, many miles away.</p> <p>The success of the College is in large part attributed to the sense of community which has been established through the close relationships between staff and pupils. The ability of staff to live on campus and to be available to pupils during the day and night has made a significant contribution to this success and continues to be a fundamental reason for seeking to maintain and increase its provision of staff accommodation.</p> <p>Policy DC22 (i) as drafted could unreasonably fetter the provision of new staff housing. It is therefore requested that criterion (i) does not apply to schools and colleges, but rather the appropriate test is that set out under criteria (ii), namely that:</p> <p><b>“Detailed evidence is submitted showing the relationship between the proposed housing and the existing or proposed rural enterprise and demonstrating why the housing is required for a full time worker in that location.”</b></p> <p>Under criterion (ii) schools and colleges should be able to put toward a reasoned, evidenced case for the provision of additional staff accommodation to meet its needs, with reference to its operational needs, its current levels of staff and accommodation and the mix of housing types required, and taking into account a number of the considerations outlined above.</p> <p>Objection is raised to criterion (vii), which states that the impact of proposed development on the special qualities and natural beauty of the AONB will be the overriding consideration in determining the suitability of proposed housing. Whilst great weight should be afforded to conserving and enhancing the AONB (NPPF, paragraph 172), Government policy also</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>attributes great weight to the creation, expansion and alteration of schools (NPPF, paragraph 94) and to outstanding, sustainable design (NPPF, paragraph 131). In the planning balance, each of these considerations would be afforded equal weight and this should be reflected in Policy DC22. Policy DC22 to provide further clarity on the relevant policy tests for educational establishments. Criteria i) and ii) should not apply. Policy DC22, criterion (vii) to attribute great weight to the AONB, rather than it being an overriding consideration.</p>	
Fowler Architecture and Planning (lpr1801)	<p>A policy to set out how the decision maker should react to such proposals is welcomed in principle. However, a distinction needs to be made between locations in the countryside that are isolated, and not isolated. Criterion (iii) should not require consideration of buildings being used as tourist accommodation as part of a sequential approach towards the provision of the workers dwelling. Such units form part of the diversification of holdings and can contribute positively to the rural economy. Additionally, this criterion should not require that there are no buildings suitable for residential conversion, as other buildings, whether suitable for residential conversion or not, may have a significant bearing on the functioning of the business; to eliminate this problem, text to the effect that there is a preference towards the re-use of existing buildings for this purpose should be employed, and that the Council may require justification for new build as opposed to conversion where this appears to be an option. Criterion (iv) is unnecessary as the functional need for the dwelling relating to the enterprise and its location is a matter covered by criterion (ii). The criterion also places an onerous test concerning '...or proposed provision within existing settlement boundaries' which will be impossible to prove or have control over the delivery of such proposed dwellings if they are not within the ownership of the holding. Criterion (viii) is unreasonable with any year, let alone a 10-year rule, concerning dwellings sold or converted. Rural enterprises continue to face pressures to change and adapt and their previous actions to be responsive cannot weigh against their future growth. Furthermore, not all dwellings serving or associated with the rural enterprise will be subject to restrictions under the planning acts by condition or obligations concerning their use and occupation. Enterprises should not be penalised by doing as</p>	<p>Comments noted.</p> <p>This policy applies to all sites outside of any defined settlement boundaries, and therefore it is not considered necessary in the policy to define what is isolated and what is not.</p> <p>It is important to demonstrate that all alternatives to a new dwelling have been discounted, to avoid the development and associated urbanisation of land in rural areas. The particular circumstances of a case will be examined as part of a planning application, and should there be a reasonable explanation for the tourist accommodation not being suitable or available on site this would be taken into account.</p> <p>It is important to demonstrate that there are no sites or properties available within settlement boundaries. Some enterprises can be within a relatively short distance to settlements, and rather than build a new dwelling in the countryside, the applicants would need to explore sites in such settlements. Applicants will need to show they have taken reasonable steps to finding alternative accommodation, and the reasons for discounting such alternatives. Again, the particular circumstances of a case will need to be examined as to whether travelling any kind of distance is appropriate for the rural enterprise. This is a</p>

Respondent (with lpr ref)	Response	Council Response
	<p>they see fit with their existing stock of dwellings without any planning restrictions.</p> <p>In the final paragraph concerning the removing of occupancy conditions, the reference to 'agricultural' should be removed as the preceding context relates to housing for any rural workers. The paragraph should also recognise that any marketing can only be for the terms imposed by the planning condition. As such, the requirement that the dwelling 'cannot meet an existing local housing need' will go beyond the terms that the condition was imposed.</p>	<p>different to criterion ii) which seeks to ensure the dwelling is needed in connection with a rural enterprise.</p> <p>In consideration of a '10 year rule' the point of the criterion is to avoid the development of new dwellings where there was one or more dwellings on the land which could have been made use of. This is regardless of whether any restrictions exist on such dwellings. If the occupiers choose to remove dwellings from their stock it does not mean then that there is an automatic 'in principle' acceptance of building further dwellings. This then adds to the domestication and urbanisation of land. Again, the particular circumstances of a case will need to be examined.</p> <p>It is considered that a stepped approach to removing an occupancy tie is appropriate, due to the particular restraint of such housing in the countryside. This is a long established approach to considering the need for rural housing and this is a method for searching for affordable accommodation before releasing previously restricted housing to 'open market'. This is particularly relevant in West Berkshire where affordable housing is in high demand.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR Policy: DC23 Conversion and/or re-use of existing redundant and disused buildings in the countryside to residential use**

**(Proposed Submission LPR Policy: DM24 Conversion of existing redundant and disused buildings in the countryside to residential use)**

Number of responses received: 12

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team, West Berkshire Council (lpr783)	Supports the policy. Cross reference to SP9 and DC10	Comments noted. Amend criterion c as follows 'Any internal or external changes do not harm the significance of a heritage asset <u>or its setting in accordance with Policies SP9 and DM12</u> '
<b>Statutory consultees</b>		
Greenham Parish Council (lpr922)	<p>More flexibility to re-use buildings not structurally sound To preserve or restore and re-use structures in the countryside that reflect the local character and remove eyesores. Delete '(i)' and renumber. "Conversion of a building that is partially but not wholly structurally sound to a residential use will not normally be allowed unless the building is itself of heritage value, its retention for another use cannot be justified and re-use will enhance its heritage value or that of its setting." Para 11.49 in the existing Supporting Text is very hard to understand as written. In any case, it might be itself redundant if the above amendment is accepted.</p>	<p>Comments noted. Amend the second paragraph of the supporting text to read 'There is a difference between a building of sound construction that has until recently been used and a derelict or semi-derelict structure that is <del>new</del> <u>not</u> of sound construction, such as a temporary farm building or domestic outbuilding.'</p> <p>The first paragraph of the supporting text makes clear that not all buildings will be suitable for conversion and or re-use, due to their location, condition or appearance. The second paragraph of the supporting text outlines that the policy does not allow for the development of derelict</p>

Respondent (with lpr ref)	Response	Council Response
		buildings, and such residential development would be considered under Policy DM1.
Hungerford Town Council (lpr167)	Supports the policy	Comments noted
Newbury Town Council (lpr2234)	<p>We do not support this policy as it stands. There should be more flexibility to re-use buildings that are not structurally sound in their entirety. To We wish to preserve - or restore and re-use - structures in the countryside that reflect the local character and to remove eyesores.</p> <p>Change Proposed: Delete '(i)' and renumber. Add in Supporting text: Conversion of a building that is partially but not wholly structurally sound to a residential use will not normally be allowed unless the building is itself of heritage value, its retention for another use cannot be justified and re-use will enhance its heritage value or that of its setting."</p> <p>Para 11.49 in the existing Supporting Text is very hard to understand as written. In any case, it might be itself redundant if the above amendment is accepted.</p>	<p>Comments noted.</p> <p>The purpose of criterion a) (was i) in the Emerging Draft LPR) is to ensure the policy is applicable to buildings capable of conversion, rather than needing significant building works to enable the habitation of the building. This follows the NPPF (paragraph 80) which permits the re-use of redundant or disused buildings. The redevelopment of buildings/sites is covered under Policy DM35 where proposals support the rural economy.</p> <p>The supporting text (first paragraph) provides further detail to the purpose of the policy, and is explicit in its intention not to apply to buildings that have an adverse visual/landscape impact, such as large agricultural sheds.</p>
Shaw cum Donnington Parish Council (lpr249)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr431)	Supports the policy	Comments noted
<b>General consultation bodies</b>		
<b>Other stakeholders</b>		
Peter Benest (lpr33)	Conversion Re-development – the applicant has to 'prove' the building is genuinely redundant or disused. A recent application in our village was approved on this basis, whereas the building was in use. Steel clad and	Comments noted. The first paragraph of the supporting text makes clear that not all buildings will be suitable for conversion, due to their location, condition or appearance.



Respondent (with lpr ref)	Response	Council Response
	<p>framed barns are not ‘vernacular’ structures worthy of preservation. If genuinely obsolete they should be demolished and the land returned to pasture.</p>	<p>When considering planning applications for the conversion of buildings outside of a defined settlement boundary the case officer would need to be satisfied that the building is genuinely redundant or disused. The supporting text provides an outline of what is to be considered in determining whether the building is genuinely disused or redundant.</p>
<p>Councillor Alan Law (lpr1076)</p>	<p><b>Development in the countryside:</b> I do question why so many related policies had to be rewritten. They were working well and had only been adopted since 2016. Additions and clarifications could have been made without the need for such a comprehensive rewrite. However having said that, what has been presented all seems sound, except for a blurring of how much demolition can now be permitted under the <b>conversion</b> of disused buildings in the countryside <b>Policy DC23</b>. The word “substantial” in the phrase “without substantial rebuilding” needs a more precise clarification.</p> <p>The word “substantial” in the phrase “without substantial rebuilding” needs a more precise clarification.</p>	<p>Comments noted.</p> <p>The Policy follows on from Policy C4 of the Housing Site Allocations Development Plan Document, which included the criteria: <i>‘the proposal involves a building that is structurally sound and capable of conversion without substantial rebuilding, extension or alteration’</i>.</p> <p>Paragraph 12.58 of the supporting text to read: ‘In order to determine whether a building is of permanent and substantial construction and suitable for and capable of conversion the Council will expect proposals to be accompanied by the following information: (i) a structural survey demonstrating the structural integrity of the building and <u>confirming that the structure is capable of conversion without substantial rebuilding or creation of new structural elements;</u> and how much of the building can be retained, and drawings indicating how much will be retained; (ii) <del>what proportion of the building will need to be replaced and/or re-constructed;</del>.....</p> <p>The meaning of ‘substantial rebuilding’ in this context is its ordinary meaning of ‘extensive’. The extent to which proposals are considered ‘substantial’ will vary depending on the scale and type of building affected and the relative extent of the works required.</p>

Respondent (with lpr ref)	Response	Council Response
Ian Parsons (lpr843)	Supports the policy	Comments noted
Councillor Tony Vickers (lpr622)	<p>We do not fully support this policy. More flexibility is required to enable re-use of buildings that may be not entirely structurally sound.</p> <p>We wish to make it easier to preserve or restore and re-use structures in the countryside that reflect the local character and remove eyesores.</p> <p>Delete '(i)' and renumber.</p> <p>Add in Supporting text:  “Conversion of a building that is partially but not wholly structurally sound to a residential use will not normally be allowed unless the building is itself of heritage value, its retention for another use cannot be justified and re-use will enhance its heritage value or that of its setting.”</p> <p>Para 11.49 in the existing Supporting Text is very hard to understand as written. In any case, it might be itself redundant if the above amendment is accepted.</p>	<p>Comments noted.</p> <p>The purpose of criterion a) (was i) in the Emerging Draft LPR) is to ensure the policy is applicable to buildings capable of conversion, rather than needing significant building works to enable the habitation of the building. This follows the NPPF (paragraph 80) which permits the re-use of redundant or disused buildings. The redevelopment of buildings/sites is covered under Policy DM35 where proposals support the rural economy.</p> <p>The supporting text (first paragraph) provides further detail to the purpose of the policy, and is explicit in its intention not to apply to buildings that have an adverse visual/landscape impact, such as large agricultural sheds.</p> <p>The first paragraph of the supporting text makes clear that not all buildings will be suitable for conversion, due to their location, condition or appearance. Redevelopment of derelict buildings for residential use would be considered under Policy DM1.</p> <p>Amend the second paragraph of the supporting text to read ‘There is a difference between a building of sound construction that has until recently been used and a derelict or semi-derelict structure that is <del>now</del> <u>not</u> of sound construction, such as a temporary farm building or domestic outbuilding.’</p>
<b>Landowners, site promoters and developers</b>		

Respondent (with lpr ref)	Response	Council Response
Englefield Estate (lpr1539)	<p>The overall approach of draft LPR Policy DC23 to supporting conversion and reuse of redundant buildings to residential use is supported. However we are concerned that the draft policy contains a number of detailed criteria with unnecessary duplication of other policies (e.g. relating to heritage, amenity and ecology) which may prejudice suitable development being delivered in rural areas. Further, the need to satisfy ‘all’ of the criteria may serve to unnecessarily restrict development which through a balanced judgement is acceptable and would otherwise bring important economic, social and environmental benefits. As noted above, the Estate’s experience previously is that similar policies have been applied to prohibit development, and instead it is important that a positive approach is taken towards new development in the countryside in line with NPPF paragraphs 77-78.</p>	<p>Comments noted. It is considered that the policy aligns with Paragraph 80 of the NPPF, which avoids isolated homes in the countryside unless particular circumstances apply, one of those being the re-use of redundant or disused buildings. The Council does take a positive approach to rural housing, given that West Berkshire is predominately a rural district. Taking paragraphs 78 and 79 of the NPPF into account the Council has outlined a Spatial Strategy, which identifies urban areas, rural service centres and service villages. It is proposed to allocate sites for residential housing in rural service centres and service villages, as well as allocating housing numbers for Neighbourhood Planning groups to carry forward in their Plans. Rural exception sites are also permitted in particular circumstances.</p> <p>Development in the countryside is strictly managed, and it is important for development proposals to be considered against all criteria within the policy. A proactive approach is always taken, and there may be cases where issues need to be finely balanced. Should a particular criterion not be relevant to a proposal (e.g. it is not a heritage asset) this would not apply to the consideration of the proposal.</p>
Fowler Architecture and Planning (lpr1802)	<p>The first paragraph of Policy DC23 should be amended to clarify this policy operates in the countryside outside of settlements.</p> <p>Criterion (ii) requires the building be proven as ‘genuinely redundant or disused’. The term ‘genuinely’ is ambiguous (see paragraphs 8 and 9 of Appeal APP/W0340/W/17/3185410) and needs to be further clarified at paragraphs 11.52 and 11.53 as these do not provide a precise definition on how this test will be applied to decisions, because they introduce other ambiguous terms such as ‘significant efforts’. If it is the Council’s expectation that marketing be required then this should be stated.</p> <p>Criterion (iii) does not apply in all cases and should be treated as mutually exclusive of the other criteria. It references ‘internal changes’. Not all internal changes amount to development and therefore cannot weigh against a</p>	<p>Comments noted.</p> <p>Amend the first sentence of the policy as follows – ‘The conversion and/or re-use of existing redundant and disused buildings <u>in the countryside</u> to residential use...’</p> <p>Clarify paragraph 12.55 of the supporting text as follows – ‘In determining whether a building is genuinely redundant or disused, it is important that the original use of the building for that purpose no longer exists. The nature of the use, when it ceased and the reason why it ceased will be carefully considered by the Council. An empty or part</p>

Respondent (with lpr ref)	Response	Council Response
	<p>proposal. It would be helpful to clarify criterion (iii) in requiring ‘represent the optimal viable reuse of a heritage asset in a manner that does not harm the significance of a heritage asset and its setting’ to be consistent with the NPPF.</p> <p>Criterion (vi) is a duplication of the matters considered under criterion (iv) and it is not clear what else this is meant to cover.</p> <p>The final paragraph restricts replacement buildings thereafter. It is unclear whether this is desirable and feasible mindful of the changing needs of rural enterprises. Furthermore, it is unclear as to how long such a presumption against will last for and whether this would apply should, for instance, an agricultural unit be subdivided and that divided unit requires buildings. This paragraph should be removed as the role of the planning system is to consider the impacts of new development, which may replace a building required following a change of use, but there is no other harm.</p>	<p>empty, building is not an unequivocal sign of redundancy, a bigger picture has to be considered. It will be necessary for applications to clearly demonstrate why the building is no longer needed and that significant efforts to re-use it have both tried and failed. <u>The Council will take account of all the circumstances and judge, whether taken together, they indicate the building is no longer needed or useful.</u></p> <p>Marketing is not a tool that is always required (the loss of a public house, where this would be required, would be considered under DM39). However, it can be a useful tool in considering whether there is any future opportunity for alternative use of the building.</p> <p>It is agreed that planning permission is not always required for internal changes, however, criterion (iii) applies to heritage assets, where, in the case of listed buildings, internal changes do need to be assessed.</p> <p>Amend criterion c) as follows ‘Any internal or external changes do not harm the significance of a heritage asset <u>or its setting in accordance with policies SP9 and DM12</u>’.</p> <p>This is different to securing an optimal viable reuse as required by para 80 of NPPF, which is considered under Policy SP9. The criterion focuses on any impact on the heritage asset rather than as an ‘exception within an exception’ type of development.</p> <p>Criterion d) (Emerging policy iv) is plot specific, and criterion f) (Emerging policy vi) looks at the wider context.</p> <p>The policy is for the conversion of buildings, not the redevelopment for residential purposes. The redevelopment of buildings/sites is covered under Policy</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
		<p>DM35 where proposals support the rural economy. This is in line with Paragraph 80 of the NPPF which only refers to conversion of buildings being an exception to residential schemes in the countryside.</p> <p>When it is the case that there has been a conversion under the policy and further extensions/buildings are proposed at a later date, the proposal would be determined under householder policies. However, it is the case that proposals would also be considered against the original policy, otherwise it undermines the aim of the policy which is to ensure a restrained conversion in the countryside, where residential development would not otherwise be appropriate.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)**

**Emerging Draft LPR Policy: DC24 Replacement dwellings in the countryside**

**(Proposed Submission LPR Policy: DM25 Replacement of existing dwellings in the countryside)**

Number of responses received: 8

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr923)	Supports the policy	Comments noted
Hungerford Town Council (lpr168)	Supports the policy. Should the policy provide some more positive encouragement to the enhancement of sustainability (ie energy needs and provision) and design creativity where the landscape / setting allows?	Comments noted.  Amend criterion c) as follows – ‘.....uses appropriate materials <u>and sustainable technologies in accordance with policy SP7</u> and does not have an adverse impact on.....’  Add the following text to the supporting text – ‘ <u>A replacement dwelling creates an opportunity to take positive action on climate change. Replacement dwellings which maximise the opportunities to enhance resilience to climate change in accordance with policies SP5 and SP7 are encouraged.</u> ’
Newbury Town Council (lpr2233)	This policy is not applicable to Newbury or most of Greenham, but we support it.	Comments noted

Respondent (with lpr ref)	Response	Council Response
Shaw cum Donnington Parish Council (lpr250)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr433)	Supports the policy	Comments noted
<b>General consultation bodies</b>		
North Wessex Downs AONB (lpr1615)	<p>The policy is not restrictive enough and has resulted in small affordable dwellings in the AONB being more than doubled in size to manor style properties. Replacement dwellings in the AONB should be restricted to an increase of no more than 33% (a third) of the original volume of the dwelling. It's key that the measurement is volume as floorspace does not account for multiple storeys. The AONB landscape is sensitive to changes in building mass/bulk. This is something that has been documented in the evidence at para 11.59 but is not reflected in the wording of the policy.</p>	<p>Comments noted.</p> <p>The Council has, through the Housing Site Allocations Development Plan Document, moved towards examining the overall design, including scale, mass and bulk. This is considered to allow applicants and their designers, and the decision maker, greater flexibility in considering the impact of a replacement dwelling on the landscape than purely looking at a numerical size increase. The applicants and decision makers still need to very carefully consider whether the replacement dwelling is proportionate to the existing dwelling, and any size increase has to be considered on the basis of the impact of a particular property in a particular location.</p> <p>The supporting text does provide some information on what would be considered in determining if a replacement dwelling is proportionate.</p> <p>Strengthen paragraph 12.63 (Submission version) of the supporting text of the supporting text to align with changes to DC28 (residential extensions) as follows - 'If a replacement dwelling is disproportionate it will not be acceptable. The key components of proportionality are the scale, massing (<u>volume</u>), height, <u>width</u>, <u>length</u>, <u>footprint (floorspace)</u> of a development, and <u>position within the plot</u></p>

Respondent (with lpr ref)	Response	Council Response
		<u>(layout) and general context of the locality, and layout of a development.</u>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr654)	<p>We support this policy. However as our comments on SP2 &amp; SP5 indicate, we wish to encourage proposals for replacement dwellings that are clearly able to achieve or approach a carbon neutral outcome, even if that involves an increase in curtilage to accommodate features of a smallholding. Tackling climate change is at least as important as preserving the landscape character.</p> <p>Amend the wording of criteria (iii) &amp; (iv) to reflect this.</p>	<p>Comments noted.</p> <p>Amend criterion c) as follows – ‘.....uses appropriate materials and sustainable technologies in accordance with <u>policy SP7</u> and does not have an adverse impact on.....’</p> <p>Paragraph 131 of the NPPF states that ‘in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.’</p> <p>Add the following text to the supporting text – ‘<u>A replacement dwelling creates an opportunity to take positive action on climate change. Replacement dwellings which maximise the opportunities to enhance resilience to climate change in accordance with Policies SP5 and SP7 are encouraged.</u>’</p>
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1803)	<p>The NPPF does not seek to control replacement dwellings as a matter of principle, including that replacement dwellings should be proportionate in size and scale to the existing dwelling. Instead, the assessment of proposals should be managed through design, landscape, ecological and heritage policies of the Local Plan. Policy DC24 should be deleted.</p> <p>Nonetheless, as drafted, the following comments on Policy DC24 are provided.</p> <p>The opening paragraph should be amended to confirm that it operates outside of settlements.</p>	<p>Whilst the NPPF does not provide specific guidance relating to replacement of dwellings in the countryside it is clear about the need for good design of development and the importance of responding to local character and distinctiveness, reflecting the identity of local surroundings. The replacement of existing dwellings in the countryside is an important local issue in West Berkshire and the policy will continue to provide a framework for decision making on this matter.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Criterion (ii) is narrowly restrictive and should be revised to also allow consideration of the existing dwelling and its existing outbuildings, as well as the size of the plot the existing dwelling sits within. There should be no limitation that replacement dwellings be proportionate in size and scale, and instead the appropriate size of a replacement dwelling (and capacity of the site to accommodate change) should be landscape and context led.</p> <p>Paragraph 11.59 has identified a perceived problem with the proliferation of replacement dwellings that are alien to the local context and the special qualities of the and natural beauty of the landscape of the AONB, which fails to conserve the landscape of the AONB. The solution to this, if it must be set out in policy, is not restriction of size based on proportionality to existing buildings, but to avoid development where this would result in alien structures that fail to conserve the landscape of the AONB.</p> <p>Criterion (iv) is inconsistent with the NPPF. It is only where an existing dwelling has its use and occupation controlled by the planning system by condition or obligation, that such restrictions on use and occupation could be reasonably imposed on a subsequent application for a replacement dwelling (if the dwelling continued to meet an essential need for a rural worker to live at or near their place of work in the countryside).</p>	<p>Both the title and the first sentence of the policy make it clear it applies to existing dwellings in the countryside.</p> <p>The replacement of small country dwellings with larger houses can radically change the character of a site to one of a more suburban nature and also reduce the supply of smaller rural dwellings. A replacement dwelling, when clearly disproportionate to the original, can be tantamount in its impact to a new dwelling and would therefore undermine both national and local policies on the restriction of new residential development in the countryside. The replacement of existing dwellings will therefore be assessed on the basis of the impact of the new development relative to the existing property on the local character of the area.</p> <p>Dwellings for rural workers are approved as an exception to the restrictive approach to housing in the countryside. This is consistent with the approach taken in the NPPF (paragraph 80) and the Council's Local Plan (Policy C5 of the HSA DPD and LPR submission Policy DM23). It is important that the dwelling still continues to be essential to the enterprise to which it is attached. In West Berkshire it is unusual for rural worker's dwellings not to have occupancy conditions applied. In the event that there isn't a condition applied (if the dwelling was present prior to needing planning permission) it is considered appropriate to ensure the future of the dwelling continues to operate as a rural worker's dwelling.</p>

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

#### Emerging Draft LPR Policy: DC25 Extension of residential curtilages in the countryside

#### (Proposed Submission LPR Policy: DM26 Extension of residential curtilages in the countryside)

Number of responses received: 8

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr924)	Supports the policy	Comments noted
Hungerford Town Council (lpr169)	Supports the policy	Comments noted
Newbury Town Council (lpr2232)	We support this policy although it does not apply to Newbury or most of Greenham.	Comments noted
Shaw cum Donnington Parish Council (lpr251)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr434)	Supports the policy	Comments noted
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
Mid and West Berkshire Local Access Forum (lpr1889)	<p>The first paragraph of the policy refers to ‘public footpaths’. MWBLAF believes that it should apply to all public rights of way.</p> <p>The Forum recommends that the first paragraph of the policy is corrected to refer to public rights of way:</p> <p>Extensions to existing residential curtilages in the countryside will only be permitted where it can be shown that there is no adverse impact on the character and local distinctiveness of the rural area, the setting of the property within the wider landscape or encroachment on the rural area, public <del>footpaths</del> <u>rights of way</u> and on the amenity of local residents.</p>	<p>Comments noted.</p> <p>Amend policy as follows – Extensions to existing residential curtilages in the countryside will only be permitted where it can be shown that there is no adverse impact on the character and local distinctiveness of the rural area, the setting of the property within the wider landscape or encroachment on the rural area, public <del>footpaths</del> <u>rights of way</u> and on the amenity of local residents....</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr655)	<p>We support this policy. However as with DC24, an exception should be made where the proposal is part of an attempt to reduce the overall carbon footprint of a property.</p> <p>Add a new paragraph in the policy: "Proposals may be supported where it can be shown that the extension is necessary to enable the property to achieve a significantly lower carbon footprint."</p>	<p>Comments noted</p> <p>The aim of the policy is to ensure that the character and local distinctiveness of the rural area and the setting of the property in the wider landscape is conserved and enhanced when extensions to residential curtilages are being considered. The policy does not preclude any attempts to reduce the overall carbon footprint of a property and proposals would be considered in conjunction with all other relevant policies in the plan including SP5 and SP7.</p>
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1804)	<p>The NPPF does not seek to control the extension of residential curtilages in the countryside as a matter of principle. Instead, the assessment of proposals should be managed through design, landscape, ecological and heritage policies of the Local Plan. Policy DC25 should be deleted.</p> <p>Nonetheless, as drafted, the following comments on Policy DC25 are provided.</p> <p>The opening paragraph should be amended to confirm that it operates outside of settlements.</p> <p>It should be acknowledged that, in terms of boundary treatments, the</p>	<p>The National Planning Policy Framework (NPPF) does not give specific guidance on extensions to curtilages in the countryside but refers to the need to recognise the intrinsic character and beauty of the countryside and protect and enhance valued landscapes such as the AONB (para 170). The acceptability of such proposals will therefore depend upon the impact on the surroundings. The impact of each proposal will be considered individually as each will be expected to have no harm on the setting or wider</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Council seeks to exert a greater level of control than is currently available due to the presence of Permitted Development rights in respect of boundary treatments.</p>	<p>landscape. The policy criteria seek to ensure that any adverse impact on character and local distinctiveness are avoided.</p> <p>Amend para 12.67 (submission version) of the supporting text as follows - There are many reasons why an individual might wish to extend the curtilage of their property <a href="#">in the countryside</a>.</p> <p>The aim of the policy is to ensure that the character and local distinctiveness of the rural area and the setting of the property in the wider landscape is conserved and enhanced when extensions to residential curtilages are being considered. Amend para 12.68 (submission version) of the supporting text as follows - ....they can stand out in the landscape and would not be <a href="#">considered acceptable when submitted as part of a planning application</a>.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC26 Subdivision of existing dwellings in the countryside****(Proposed Submission LPR Policy: DM27 Subdivision of existing dwellings in the countryside)**

Number of responses received: 8

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr925)	Supports the policy	Comments noted
Hungerford Town Council (lpr170)	Supports the policy	Comments noted
Newbury Town Council (lpr2231)	We support this policy although it does not apply to Newbury or most of Greenham.	Comments noted
Shaw cum Donnington Parish Council (lpr252)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr435)	Supports the policy	Comments noted
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr656)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		
Englefield Estate (lpr1540)	Provision for the sub-division of existing dwellings in the countryside will help to further meet the needs of rural communities and boost the overall supply of housing. The introduction of draft LPR Policy DC26 is therefore welcomed. It will be important that a positive approach is taken to considering applications for such schemes.	Comments noted
Fowler Architecture and Planning (lpr1789)	<p>The NPPF does not seek to control the subdivision of an existing dwelling in the countryside as a matter of principle. Instead, the assessment of proposals should be managed through design, landscape, ecological and heritage policies of the Local Plan. Policy DC26 should be deleted. Nonetheless, as drafted, the following comments on Policy DC26 are provided.</p> <p>The Government has consulted on revisions to the NPPF. A change at proposed paragraph 80 is that subdivision need not be just of an existing dwelling, but an 'existing building' and therefore the wording of Policy DC26 should reflect the precise definition in the NPPF.</p> <p>Criterion (iii) does not apply in all cases and should be treated as mutually exclusive of the other criteria. It references 'internal changes'. Not all internal changes amount to development and therefore cannot weigh against a proposal. It would be helpful to clarify criterion (iii) in requiring 'represent the optimal viable reuse of a heritage asset in a manner that does not harm the significance of a heritage asset and its setting' to be consistent with the NPPF.</p> <p>Criterion (vii) needs further clarification on how it will operate in conjunction with DC30(h) and (i) which may not be feasible in cases where subdivision does not enable the expansion of the garden.</p> <p>The final paragraph under Policy DC26 (and 11.67) to require consideration of accessibility principles is inconsistent with the NPPF. Paragraph 79</p>	<p>Comments noted</p> <p>The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers.</p> <p>The NPPF published in July 2021 has not incorporated this change and refers to 'residential building'.</p> <p>It is agreed that planning permission is not always required for internal changes, however, criterion (d) (submission version) applies to heritage assets, where, in the case of listed buildings, internal changes do need to be assessed. Amend criterion (d) (submission version) as follows 'Any internal or external changes do not harm the significance of a heritage asset <a href="#">or its setting in accordance with Policy SP9</a>'</p> <p>Criterion (h) (submission version) deals with curtilages. LPR Policy DM31 (residential amenity) refers to the length of a garden, but does caveat it with 'where possible'. DM31 seeks to ensure sufficient distance between windows</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	<p>confirms that isolated homes in the countryside can be formed through subdivision, whereby accessibility to local services and facilities is not determinative of the principle of the development. Given subdivision is expressly supported in isolated locations in the countryside, there cannot be any restrictions on the principle of subdivision in non-isolated locations in the countryside. A lack of accessibility cannot be a justified policy reason to refuse the development.</p>	<p>serving habitable rooms and a garden size would not affect this as the buildings would already be there, rather than assessing the curtilage.</p> <p>The NPPF does allow subdivision in the countryside, but this does not prevent other factors coming in to the assessment of a scheme (and also does not override the statutory status of the development plan as a starting point for decision making). The NPPF also seeks 'accessible services' and for land to be available in the right places (para 8) whilst the whole of section 9 in the NPPF is about promoting sustainable transport. It is therefore still considered consistent with the NPPF to consider accessibility in a development plan policy for West Berkshire.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC27 Residential Extensions****(Proposed Submission LPR Policy: DM28 Residential Extensions)**

Number of responses received: 8

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr927)	Supports the policy	Comments noted
Hungerford Town Council (lpr171)	We support the policy. It does not cover “ratchet” development. For example, if a garage is built, then the loft is converted to a room, then the garage is converted to habitable accommodation and then an attempt is made to separate it as a separate dwelling. There are at least two examples of this in Shaw-cum-Donnington.	Comments noted. LPR Policy DM29 sets out the Council’s approach to residential annexes and DM27 the Council’s approach to the subdivision of dwellings in the countryside. Each planning application would be determined on its own merits.
Newbury Town Council (lpr2230)	We support this policy	Comments noted
Shaw cum Donnington Parish Council (lpr253)	Supports the policy	Comments noted



Respondent (with lpr ref)	Response	Council Response
Stratfield Mortimer Parish Council (lpr436)	Supports the policy	Comments noted
<b>General consultation bodies</b>		
The Woodland Trust (lpr999)	<p>We support h) in favour of the retention of trees in line with policy DC14 and i) in support of enhancing biodiversity.</p> <p>As well as providing a pleasant residential environment, trees and gardens contribute towards biodiversity and health and well-being and can also help screen or soften the visual impact of a new extension and help to integrate it with the surroundings.</p> <p>We further request that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted. We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on <i>Local Authority Tree Strategies</i> (July 2016).</p>	Comments noted. LPR Policy DM15 sets out the Council's approach to trees, woodland and hedgerows. This makes clear that 'where loss or damage to non-protected trees, woodland or hedgerows is unavoidable, that appropriate replacement or compensation, including aftercare, will be required.' The guidance produced by The Woodland Trust will usefully inform that process.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr657)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1806)	<p>The NPPF does not seek to control the extension of an existing dwelling as a matter of principle. Instead, the assessment of proposals should be managed through design, landscape, ecological and heritage policies of the Local Plan. Policy DC27 should be deleted.</p> <p>Nonetheless, as drafted, the following comments on Policy DC27 are provided.</p> <p>Criterion (a). There is no justification for the assessment of the scale of the enlargement to be related to the 'original dwelling'. The planning assessment of the appropriateness of the scale of the enlargement must be relative to the host building as exists at the time of the application.</p>	<p>Comments noted.</p> <p>A great deal of planning applications in the District are for householder extensions. It is not unusual, or unsound, to include detailed planning policies in Local Plans to aid in the design of household extensions and the decision making process in assessing such schemes. The policy gives applicants, agents, interested parties and decision makers clear criteria under which a household extension would be assessed against, thus creating a level of</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Criterion (b). There is no justification for the assessment of the plot characteristics to be judged against the 'original dwelling'. The planning assessment of the appropriateness of the proposal must be relative to the host building as exists at the time of the application.</p> <p>The above criteria do not accord with the Government's objectives to ensure homeowners are able to alter and extend their homes, in all locations. The wording of criterion (a) would preclude an upward extension, which by definition, would not be clearly subservient to an existing dwelling given the increase in height. The scale of an enlargement must consider the host building AND the wider locality. It may be appropriate for extensions that are not subservient provided that they are well designed. The policy must not preclude well-designed extensions.</p> <p>The final paragraph of 11.84 is inconsistent with the Permitted Development Order, which defines the terms for prior notification applications for larger extensions and upward extensions. Proposals subject to prior approval are not subject to policies of the development plan for their assessment. This sentence must be removed.</p>	<p>certainty in what is expected from extensions. The policy would also be read alongside the policies listed in the representation.</p> <p>It is not proposed to delete the policy.</p> <p>It is important to consider the original dwelling, particularly for dwellings outside of any defined settlement boundary. An extension has the potential to dominate the character and appearance of a dwelling and of its locality, and when in the countryside, lead to an overdevelopment and being disproportionate. However, the criterion allows the decision maker to take into account the existing dwelling, ensuring that the extension is of appropriate design and in character.</p> <p>It is particularly important to assess the original dwelling, as it could be the case that extensions upon extensions could significantly change the character of the dwelling, the plot within which it sits, and of the locality, to their detriment. When in the countryside this may suburbanise the plot and adversely affect the rural character and qualities of the area.</p> <p>It is not considered that the policy precludes well designed extensions. The assessment depends very much on the particular circumstances of the dwelling, whether it has been extended previously, its plot, and its surroundings, as well as whether it lies within any designated areas (AONB or Conservation Area). These factors and the proposal would fall into the balance of considerations when determining a planning application.</p> <p>It is not considered the policy precludes certain types of development, but seeks to ensure that extensions do not adversely affect the character of the building, the site, and the surrounding area. The policy cannot preclude permitted development proposals. As outlined below only the impact of amenity can be considered (subject to neighbour objection).</p>

Respondent (with lpr ref)	Response	Council Response
		<p>It is agreed that the policy cannot be used to assess permitted development schemes which are subject to prior approvals in their entirety. Only neighbour amenity can be considered (should a neighbour object).</p> <p>Amend paragraph in the supporting text as follows  <a href="#">‘Proposals which are permitted development subject to prior approval (e.g. larger extensions) can be assessed using criterion d of this policy, as well as Policy DM31 (amenity), in the event where neighbouring residents raise objections’</a>. The decision maker is able to rely on planning policies when making an assessment on neighbour amenity, which Development Management case officers already do.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC28 Residential Annexes

### (Proposed Submission LPR Policy: DM29 Residential Annexes)

Number of responses received: 7

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr928)	Supports the policy	Comments noted
Hungerford Town Council (lpr172)	Supports the policy	Comments noted
Newbury Town Council (lpr2229)	We support this policy	Comments noted
Shaw cum Donnington Parish Council (lpr254)	We support the policy	Comments noted
Stratfield Mortimer Parish Council (lpr432)	Supports the policy	Comments noted
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr658)	Supports the policy	Comments noted
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1807)	<p>The NPPF does not seek to control residential annexes as a matter of principle. Instead, the assessment of proposals should be managed through design, landscape, ecological and heritage policies of the Local Plan. Policy DC28 should be deleted.</p> <p>It must be clarified that Policy DC27 must only be satisfied where the creation of an annex involves the creation of new built form. Requiring a physical link to the main dwelling is tautologous where the following criterion also requires a close spatial relationship. Criterion (v) is replicated in the text below.</p>	<p>Comments noted</p> <p>The Council considers that a targeted DM policy is necessary to guide development, and to provide clear and transparent advice to developers and DM officers.</p> <p>Para 11.85 of the supporting text of the Emerging Draft LPR makes it clear that some types of annex benefit from permitted development rights.</p> <p>Add to criterion iii of the Emerging Draft LPR policy – <a href="#">if it is detached.</a></p> <p>Remove criterion v of the Emerging Draft LPR policy</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC29 Residential Space Standards

### (Proposed Submission LPR Policy: DM30 Residential Space Standards)

Number of responses received: 11

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr173)	Supports the policy	Comment noted
Shaw-cum-Donnington Parish Council (lpr255)	We support the policy. It is difficult to understand how this policy will be enforced. Developers will claim that they only need to meet building regulations that, we assume, contain some national space standards.	Comments noted
Newbury Town Council (lpr2228)	We support this policy	Comment noted
Stratfield Mortimer Parish Council (lpr437)	Supports the policy	Comment noted
Greenham Parish Council (lpr929)	Supports the policy	Comment noted
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
Heritage Forum (lpr93)	In the absence of national standards, the Council might wish to consider the London Housing Design Guide (2010) <a href="http://www.london.gov.uk/sites/default/files/interim_london_housing_design_guide.pdf">www.london.gov.uk/sites/default/files/interim_london_housing_design_guide.pdf</a> or Housing Design Quality and Standards SPG (2020) <a href="http://www.london.gov.uk/sites/default/files/hdspg_2020_module_c.pdf">www.london.gov.uk/sites/default/files/hdspg_2020_module_c.pdf</a>	Comments noted
Home Builders Federation (lpr1953)	<p>Policy DC29 requires development to meet national spaces standards as a minimum. Whilst the HBF share the Council desire good quality homes delivered within West Berkshire we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms.</p> <p>Given the poor affordability of property in the area and the tight constraints on development it is therefore important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy. However, we could not find any evidence prepared by the Council to suggest that development below space standards is an endemic concern within West Berkshire. As such we would suggest that policy D5 is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.</p> <p>Changes: We could not find any evidence prepared by the Council to suggest that development below space standards is an endemic concern within West Berkshire. As such we would suggest that policy D5 is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.</p>	<p>Comments noted The supporting evidence will be updated to strengthen the proposed policy and demonstrate that the policy is both needed, and viable as follows –</p> <p><u>'Measurement of dwellings permitted in West Berkshire since the adoption of the Core Strategy show that a significant proportion do not meet the nationally described space standard. This has been found to be the case across the District but is particularly notable for the conversion of residential annexes and for town centre development.'</u></p> <p><u>The West Berkshire whole plan viability assessment has concluded that development across the District can comply with the nationally described space standard (along with the other policies set out in the Local Plan) and remain viable.'</u></p>
<b>Other stakeholders</b>		

Respondent (with lpr ref)	Response	Council Response
Councillor Tony Vickers (lpr659)	Supports the policy	Comment noted
<b>Landowners, site promoters and developers</b>		
Bloor Homes and Sandford Farm (lpr2178)	<p>Policy DC29 requires new residential development to meet, as a minimum, national space standards. In addition, this Policy seeks to secure the 'optional' space standards. The PPG advises that:</p> <p>Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.</p> <p>Rather than provide the justification necessary to include these 'optional' standards in the Local Plan, the Council's approach is to place the burden of justifying a departure from this policy requirement on to the developer/applicant. This is plainly at odds with the Government's intention and results in highly prescriptive standards being required as a matter of course.</p>	<p>Comments noted The supporting evidence will be updated to strengthen the proposed policy and demonstrate that the policy is both needed, and viable as follows –</p> <p><u>'Measurement of dwellings permitted in West Berkshire since the adoption of the Core Strategy show that a significant proportion do not meet the nationally described space standard. This has been found to be the case across the District but is particularly notable for the conversion of residential annexes and for town centre development.'</u></p> <p><u>The West Berkshire whole plan viability assessment has concluded that development across the District can comply with the nationally described space standard (along with the other policies set out in the Local Plan) and remain viable.'</u></p>
Sovereign Housing Association Ltd. (lpr2170)	SHA strongly believe everyone should have access to a safe, adequately sized and energy efficient home. The impact of national and regional lockdowns, enforced during the global pandemic, have highlighted the importance of ensuring people have access to adequately sized homes.	Comments noted. The proposed policy will be amended to avoid repeating national policy and to ensure clarity as follows –



Respondent (with lpr ref)	Response	Council Response
	<p>SHA broadly support the aspiration of Policy DC29 requiring all development within West Berkshire to meet the nationally described space standards.</p> <p>It is noted the policy sets out eight additional components to be achieved. These components mirror those already set out within the NDSS and are unnecessarily listed and risk confusion should the NDSS be revised during the Plan Period.</p>	<p><u>'All new dwellings, including from permitted development, change of use, and conversion, should comply with the Proposals for new residential units will be required to meet nationally described space standards, as set out in the Technical Housing Standards (2015) or as superseded.</u></p> <p>[4]</p> <p>In addition to the above, the following should be provided, where practicable:</p> <p>a) A dwelling with two or more bedspaces shall have at least one double (or twin) bedroom;</p> <p>b) In order to provide one bedspace, a single bedroom shall have a floor area of at least 7.5 sq m and is at least 2.15 m wide;</p> <p>c) In order to provide two bedspaces, a double (or twin bedroom) shall have a floor area of at least 11.5 sq m;</p> <p>d) One double (or twin bedroom) shall be at least 2.75 m wide and every other double (or twin) bedroom shall be at least 2.55 m wide;</p> <p>e) Any area with a headroom of less than 1.5 m shall not be counted within the gross internal area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1.0 sq m within the gross internal area);</p> <p>f) Any other area that shall be used solely for storage and has a headroom of 900-1500 mm (such as under eaves) shall be counted at 50% of its floor area, and any area lower than 900 mm shall not be counted at all;</p> <p>g) A built-in wardrobe counts towards the gross internal area and bedroom floor area requirements, but shall not reduce the effective width of the room below the minimum widths set out above. A built-in area in excess of 0.72 sq m in a double bedroom and 0.36 sq m in a single bedroom counts towards the built-in storage requirement; and</p> <p>h) The minimum floor to ceiling height shall be 2.3 m for at least 75% of the gross internal area.</p>

Respondent (with lpr ref)	Response	Council Response
		[1] <del>Appropriate space standards are achieved by meeting the nationally described space standard, or any subsequent Government standard.</del> <sup>1</sup>
Tetlow King Planning Ltd for Aster Group (lpr2356)	<p>Nationally Described Space Standard</p> <p>We understand that Policy DC 29 requires all new residential development to adhere to the Nationally Described Space Standard (NDSS). If the Council seeks to require NDSS across all residential development, it must be demonstrated that it is being done to address a clearly evidenced need, as set out in Planning Practice Guidance (Paragraph: 002 Reference ID: 56-002-20160519). In the absence of this evidence, a blanket application of NDSS might undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered across West Berkshire. The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not therefore essential for all dwellings to achieve the standard in order to provide good quality living. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary.</p> <p>We also note that footnote [1] of Policy DC 29 states that “Appropriate space standards are achieved by meeting the nationally described space standard, or any subsequent Government standard.” Requiring future development to comply with a standard that is currently unknown and therefore not robustly viability tested in West Berkshire at this stage would be inappropriate. Viability testing against any new future standard would be needed before the local plan could require applicants to comply with such a standard.</p> <p>Changes: We recommend that the Council reviews the local plan viability assessments with regard to these matters in accordance with the PPG tests which require that where a need for the standards is identified, local planning authorities should justify inclusion of a policy, taking account of need, viability and timing:</p>	<p>Comments noted.</p> <p>The supporting evidence will be updated to strengthen the proposed policy and demonstrate that the policy is both needed, and viable as follows –</p> <p><u>‘Measurement of dwellings permitted in West Berkshire since the adoption of the Core Strategy show that a significant proportion do not meet the nationally described space standard. This has been found to be the case across the District but is particularly notable for the conversion of residential annexes and for town centre development.</u></p> <p><u>The West Berkshire whole plan viability assessment has concluded that development across the District can comply with the nationally described space standard (along with the other policies set out in the Local Plan) and remain viable.’</u></p> <p>Agreed. Future standards cannot be predicted at this stage and would need to be considered before being introduced in the local plan. The supporting text will be amended as follows -</p> <p><u>‘It is important that new homes should provide an adequate living environment for their occupiers. Building to appropriate space standards will ensure new homes provide sufficient space for basic daily activities and needs.</u> <u>New homes in England are amongst the smallest in Europe and houses that are too small, or that are</u></p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• <b>“need</b> – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• <b>viability</b> – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• <b>timing</b> – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”</li> </ul> <p>(Paragraph: 020 Reference ID: 56-020-20150327)</p> <p>We also note that footnote [1] of Policy DC 29 states that “<i>Appropriate space standards are achieved by meeting the nationally described space standard, or any subsequent Government standard.</i>” Requiring future development to comply with a standard that is currently unknown and therefore not robustly viability tested in West Berkshire at this stage would be inappropriate. Viability testing against any new future standard would be needed before the local plan could require applicants to comply with such a standard.</p>	<p><u>overcrowded, can impact on the quality of life of the residents of those homes. West Berkshire Council’s evidence indicates that new homes in the District often fall short of the nationally described space standards.</u></p> <p>The NPPF highlights that high quality design and a good standard of amenity should be sought in new development. National policy also recognises that local planning authorities should address barriers to improving health and wellbeing through a high standard of housing design. This policy requires new homes to have appropriate space for occupants to enable them to have a good quality of life and healthy lifestyle.</p> <p><u>The Government has introduced nationally described space standards to help the delivery of houses that are of a sufficient size for the occupiers of those homes. This policy sets out that the Council will require all new residential development in the District to comply with the nationally described space standards (or any subsequent Government standard). that new housing in the district are expected to achieve.</u> The Council’s starting point will be for all new homes, including subdivisions of larger properties and conversions, to meet the appropriate space standards.  <del>Nationally described space standards have been issued by the Ministry of Housing, Communities and Local Government (MHCLG) in order to advise local authorities, the minimum standards that should be achieved. The Council will therefore require all residential development to meet the nationally described space standard (or any subsequent Government standard). unless it can be shown that the standards are not practicable in the face of other material considerations and policy requirements. For example, an exception may be</del></p>

Respondent (with lpr ref)	Response	Council Response
		<p>made where works needed to achieve the standards would adversely affect the significance of a heritage asset or would require unachievable changes to a building earmarked for conversion.<sup>1</sup></p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC30 Residential amenity****(Proposed Submission LPR Policy: DM31 Residential amenity)**

Number of responses received: 8

<b>Respondent (with lpr ref)</b>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
NA		
<b>Statutory consultees</b>		
Hungerford Town Council (lpr174)	Agree with the proposed policy.	Comments noted.
Shaw-cum-Donnington Parish Council (lpr256)	We support the policy. How does the parking apply to flats particularly in the town centre? In these cases little or no amenity space is provided apart from cycle or (if you are lucky) car parking space.	The Policy provides guidance for outdoor amenity space for flats. There is no distinction between town centre locations and out of centre locations, as the local environment (e.g. proximity to public green spaces) may affect the amount of open space provided as part of a development. Parking does not count in the amenity space calculation. Furthermore, balconies, where they do provide high quality space (e.g. Newbury Racecourse) may be counted as outdoor amenity space.
Stratfield Mortimer Parish Council (lpr438)	Agree with the proposed policy.	Comments noted.

Respondent (with lpr ref)	Response	Council Response
Greenham Parish Council (lpr930)	Agree with the proposed policy.	Comments noted.
Newbury Town Council (lpr2227)	We support this policy	Comments noted.
<b>General consultation bodies</b>		
Heritage Forum (lpr94)	<p>Based on current trends, should not new dwellings include space which can be used as office space?</p> <p>11.100 We suggest that this clause is included in DC30.</p>	<p>The Policy is primarily aimed at ensuring that new developments do not have an adverse impact on neighbouring properties, and ensure that there is adequate private amenity (garden) space and a source of natural light.</p> <p>Adequate provision of amenity space can vary between properties, particularly where there is already a garden space which is smaller than what the policy is trying to achieve. As the policy applies to flats as well as houses it is considered appropriate to keep the guide for sizes in the supporting text.</p> <p>Emerging Draft LPR Policy DM30 (Residential Space Standards) refers to internal residential space standards, with a cross reference to that policy in DM31.</p>
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr660)	Agree with the policy.	Comments noted.
<b>Landowners, site promoters and developers</b>		
Bloor Homes & Sandford Farm (lpr2179)	<p>We agree that all development should provide a high standard of amenity for existing and future occupiers of land and buildings. These are considerations that vary from case to case and must therefore be determined on that basis. The second half of the policy prescribes various amenity requirements. Whilst unobjectionable as a matter of principle, certain of these set out particular standards (by reference to DC29), dimensions or distances.</p>	<p>The policy seeks to provide a high standard of amenity for existing and future users of land and buildings, and includes particular criteria for the designer and decision maker to consider. The recommended garden distance is a long established method of seeking to achieve a distance of 21 metres between windows, to avoid overlooking.</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	<p>We have made comments in relation to DC29 already and do not repeat these here.</p> <p>In respect of garden dimensions and separation distances, there may justifiable reasons why in individual circumstances these cannot be achieved. Determination of a planning application will require judgement as to whether, in those instance, residential amenity would be materially harmed on the basis of factor and degree. This requires a degree of flexibility to be introduced into the policy.</p>	<p>The policy is a starting point, and should there be any justified ground on which the criteria cannot be complied with, evidence can be provided with the scheme (at pre-application/planning application stage). It is then for the decision maker to make a judgement on whether the scheme is acceptable.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC31 Designated Employment Areas****(Proposed Submission LPR Policy: DM32 Designated Employment Areas)**

Number of responses received: 16

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Shaw cum Donnington Parish Council (lpr257)	We support the policy. We note that proposals that would result in the loss of employment floorspace will not be permitted. How does this relate to the conversion of office buildings to residential use that has recently been permitted by government? So how is it intended to protect such office buildings from conversion?	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Support for the policy is noted.</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that were necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>
Stratfield Mortimer Parish Council (lpr439)	<p>Policy is supported.</p> <p>We have slight reservations about this: This is the first time that Employment outside designated Employment Areas is mentioned in any meaningful way. Would it not be appropriate to mention this in the SPs? This is particularly appropriate with the home working economy having risen so quickly due to the pandemic.</p>	<p>Comments noted.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites.</p> <p>The Emerging Draft LPR policy will be amended to provide clarity and avoid duplication with other policies within the</p>



Respondent (with lpr ref)	Response	Council Response
		plan. Text relating to business development outside DEAs will be moved to Policy SP20, and signposted to Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy – which considers economic development, including office, industry, storage and distribution, in the countryside.
Greenham Parish Council (lpr931)	<p>Policy is not supported.</p> <p>There isn't an understandable definition of small scale commercial in the proposed policy.</p> <p>Changes to be made/preferred approach: GPC would like a definition created to define what is meant by small scale commercial.</p>	Comments noted. The policy will be amended to provide clarity regarding development within DEAs.
Newbury Town Council (lpr2226)	<p>We broadly support this policy, but it is unclear what is meant by “small scale commercial and services uses” or why they might not be permitted in DEAs.</p> <p><b>Reason:</b> Every kind of “commercial and services” land use would seem to involve “employment”. So, it is unclear why there is a need for any policy to control it. It might even be encouraged, because if (for example) it means personal services like hairdresser or food takeaway food, then locating such businesses within a DEA surely should reduce the need of customers working in that DEA to travel to/from the DEA to secure those services.</p> <p>An entire rethink of “business uses” within the Local Plan appears to be needed. So much “business” now takes place within the home. It makes the separation of “residential” and “non- residential” property for all purposes (including local taxation) seem outdated. However, this is a matter beyond planning policy although linked to it.</p> <p>There should perhaps be some reference to “live-work” units here – or in a separate policy.</p> <p>Changes to be made/preferred approach: None proposed at this stage. Examples are needed to show why this aspect of the policy is required,</p>	<p>Comments noted. The policy will be amended to provide clarity regarding development within DEAs.</p> <p>This policy relates to DEAs, their role and function as well as the uses permitted within these areas. They are locations across the District designated for business development, and for the purposes of the LPR business development relates to offices, industry, storage and distribution uses. Other employment generating uses, such as hairdressers, supermarkets etc. fall under the term economic development which is wider than the term business development within this plan.</p> <p>The Planning Practice Guidance (PPG) requires strategic policy-making authorities to gather evidence on existing business needs and plan for future business uses.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>especially with the major changes expected to the nature of “offices”. However, that part which allows for “Outside of DEA” business uses is supported, although the use of “(a)” when there is no “(b)” is redundant.</p>	
<p>Lambourn Neighbourhood Development Plan Steering Group (lpr1708)</p>	<p>EMP5 - The LNDP welcomes the opportunity to comment on West Berkshire's Local Plan Review.</p> <p>We have based our comments on our findings from the Residents' Survey undertaken by the LNDP as well as recognizing and embracing the need to further develop employment opportunities locally. The Landscape Character Appraisal for the emerging Lambourn Neighbourhood Development Plan includes a local Landscape Character Area, within the Shefford Wooded Downland LCA, based on Membury Airfield (LCA3). It recommends that to help plan, manage and protect the distinctiveness of LCA3, <i>The scale and planning of development at this location needs much careful consideration of any further growth to help avoid further change in character.</i></p> <p>Although recognised as an area of low demand, with constraints of being in an AONB. with a few Heritage Sites and Conservation Areas we would actively encourage the development of small local enterprise as we want the Parish to be a place where people want to live and work, as well as continuing to strengthen and the develop the Racing Industry within the Valley and the cluster industries that surround it.</p> <p>In the plan there is an intention to extend the DEA at Membury, this is one area where we believe there is little evidence to support the expansion, that would not have a detrimental impact on the rural character of the area and the AONB.</p> <p>We have seen much development of the existing compact Membury site and have witnessed a marked increase of HGV'S and other large transporters to the area, any further development in this area would be unsustainable. Other areas within the Parish are Lowesdon work, the Membury Business Park, Hurst Farm, Hadley Farm, and the Membury Business Park. These sites are spread out along Ermin Street and Ramsbury Road and sit amongst the</p>	<p>Comments noted.</p> <p>This representation is a duplicate of the representation made on Emerging Draft LPR Policy SP21. See the Council's response to this representation on Emerging Draft LPR Policy SP21 (ref: lpr1707).</p> <p>To inform the LPR the Council has undertaken landscape sensitivity and capacity assessments on the Membury Industrial Estate and Lowesdon Works (Membury Business Park) to gain a better understanding of the impact of existing and planned/proposed development on the area. The Landscape Sensitivity and Capacity Assessments will be published alongside the Regulation 19 consultation.</p> <p>Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy recognises that many rural areas host a large number of small and medium sized enterprises which are vital to providing local job opportunities and a diverse economy. The policy therefore seeks to support appropriate new or expanding businesses in the countryside, supporting sustainable economic growth within the rural areas without detriment to the environment.</p> <p>Further to this, Proposed Submission LPR Policy DM37 relates to the Equestrian and Horseracing Industry and seeks to maintain and allow for its sensitive growth, whilst conserving environmental quality and countryside character.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>open green spaces within the AONB - the importance of maintaining the balance between the spread-out Hamlets and Industry is key as we do not want to lose the vistas and open spaces.</p> <p>Four of the above-mentioned sites offer opportunities for small local enterprise in keeping with the North Wessex Downs AONB Policy, two are yet to be redeveloped, but have acquired planning consent (Hadley Farm and Lowesdon Works) whilst Membury Business Park has several units unoccupied, as does Ariel Business Park.</p> <ul style="list-style-type: none"> <li>• Economic forecasts show industrial job growth is predominantly in the East of west Berkshire-not in the West where this sloe is located.</li> <li>• There is poor road access to the M4. The distance from Membury to Junction 14 is 7kms, mainly along unclassified rural lanes and the B4000 (Ermin Street), none of which have pavements.</li> <li>• The proposed site is located within the Area of Outstanding Natural Beauty and previously additional development in this area has been deemed unsustainable by both West Berkshire Council's own Highways and Environmental Planning experts. This year the annual AONB Conference (29/01/21) again stressed the importance of protecting and conserving these areas. Plans to encroach on these areas need to have a major economic benefit and must have considered alternative sites. Within the WBC Employment Land Review (ELR), alternative sites are identified, in areas where demand for this type of expansion is required, therefore the extension of EMP5 cannot be justified.</li> <li>• Over a third of all proposed industrial expansion in West Berkshire is at EMP5 in the Western area. The ELR however identifies that all major housing developments are in Newbury and the East. This leads to an imbalance between new homes and new work opportunities. In effect, people would need to commute to work which would again impact on the local road networks around Membury - which would increase the unsustainability of this site.</li> <li>• Carbon Dioxide levels show West Berkshire as the worst performing region in the whole of Berkshire, and well above South East England by 38%. EMP5 will generate significantly longer travel journeys than</li> </ul>	<p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment uses. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation. In addition, the Council's employment land evidence (ELR 2020 and ELR 2022) considers sites promoted to the Council from a property market perspective and this evidence has also inform the proposed site allocations within the LPR.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>other sites, increasing the carbon emissions for the area, when WBC wish to reduce these in West Berkshire.</p> <ul style="list-style-type: none"> <li>The Membury PEA (now DEA) is made up of 8 parcels of land in Lambourn Woodlands. Two of the largest DEA sites lie adjacent to the proposed extension area, (this does not include the Motorway Services). Ramsbury Road and Ermin Street (B4000) are the access routes in the main to Membury, although traffic is also travelling along the A4 and reaching the site via Chilton Foliat. The B4000 is on the WBC Freight Route Plan, but this has not been updated since 2009, and there has been a significant increase in traffic to Membury since then by HGVs as the businesses have developed on site. The EMP5 site is the industrial site furthest from an A road.</li> </ul>	
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr95)	<p>Policy is supported.</p> <p>It may be implied, but is not stated, that DEA's will afford protection against conversion of premises to housing under PDR's. Is that correct? If so, it will be a great relief.</p>	<p>Comments noted. No changes to the policy are required in light of this representation</p> <p>In accordance with national legislation, the General Permitted Development Order (GDPO as amended) allows for the conversion of offices to residential under permitted development rights, subject to the prior approval process. Supporting text will be added to highlight that where necessary and appropriate planning conditions may be imposed to restrict changes of use on new development in order to maintain the supply of space/land.</p>
<b>Other stakeholders</b>		
Councillor Alan Macro (lpr766)	<p>Policy is not supported.</p> <p>"Theale Rail-Road site" does not represent the current use of the site as it includes:</p> <ul style="list-style-type: none"> <li>A coated road-stone (asphalt) plant</li> <li>Concrete batching plants.</li> </ul>	<p>Comments noted. The policy will be amended.</p> <p>The policy wording regarding the Theale rail road site will form a new standalone policy – Proposed Submission LPR Policy DM43 Theale Rail-road Transfer Site. This particular site is unique in West Berkshire and does not form part of a DEA thus warrants a separate policy to ensure it</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Changes to be made/preferred approach: It should be renamed "Theale Rail-served Site" and the policy wording changed to: "The rail-served site at Wigmore Lane, Theale, is reserved solely for those uses that require.</p>	<p>continues to be protected for those industries which require a rail-road transfer facility and access to the highway network.</p> <p>The title of the new policy will read 'Theale Rail-road Transfer Site'.</p>
<p>Councillor Tony Vickers (lpr661)</p>	<p>Policy is supported.</p> <p>We broadly support this policy but have two distinct comments:</p> <ol style="list-style-type: none"> <li>1. It is unclear what is meant by "small scale commercial and services uses" or why they might not be permitted in DEAs.</li> <li>2. Theale Rail-Road site should be re-named</li> </ol> <p>-----</p> <p><b>1. Small scale commercial and services uses.</b></p> <p>Every kind of "commercial and services" land use would seem to involve "employment". So it is unclear why there is a need for any policy to control it. It might even be encouraged, because if (for example) it means personal services like hairdresser or food takeaway, then locating such businesses within a DEA surely should reduce the need of customers working in that DEA to travel to/from the DEA to secure those services.</p> <p>An entire rethink of "business uses" within the Local Plan appears to be needed. So much "business" now takes place within the home. It makes the separation of "residential" and "non residential" property for all purposes (including local taxation) seem outdated. However this is a matter beyond planning policy although linked to it.</p> <p>There should perhaps be some reference to "live-work" units here – or in a separate policy.</p> <p><b>2. Theale Rail - Road Site</b></p> <p>The name does not represent the current use of the site as it includes:</p> <ol style="list-style-type: none"> <li>a. A coated road-stone (asphalt) plant</li> <li>b. Concrete batching plants.</li> </ol> <p>Changes to be made/preferred approach:</p>	<p>Comments noted. The policy will be amended to provide clarity.</p> <p>This policy relates to DEAs, their role and function as well as the uses permitted within these areas. They are locations across the District designated for business development, and for the purposes of the LPR business development relates to offices, industry, storage and distribution uses. Other employment generating uses, such as hairdressers, supermarkets etc. fall under the term economic development which is wider than the term business development within this plan.</p> <p>The Planning Practice Guidance (PPG) requires strategic policy-making authorities to gather evidence on existing business needs and plan for future business uses.</p> <p>The policy wording regarding the Theale rail road site will form a new standalone policy – Proposed Submission LPR Policy DM43 Theale Rail-road Transfer Site. This particular site is unique in West Berkshire and does not form part of a DEA thus warrants a separate policy to ensure it continues to be protected for those industries which require a rail-road transfer facility and access to the highway network.</p> <p>The title of the new policy will read 'Theale Rail-road Transfer Site'.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>1. Examples are needed in supporting text to make clear the purpose of this policy and what exactly it means, especially with the major changes expected to the nature of “offices”. However that part which allows for “Outside of DEA” business uses is supported, although the use of “(a)” when there is no “(b)” is redundant.</p> <p>2. This site should be re-named “<b>Theale Rail-served Site</b>” and policy wording changed to “The rail-served site at Wigmore Lane, Theale, is reserved solely for those uses that require rail access....”</p>	
Savills on behalf of Englefield Estate (lpr1541)	<p>Draft LPR Policy DC31 relates to Designated Employment Areas (DEAs) and states that proposals for employment uses will continue to be focused within DEAs. Whilst this is a logical and sustainable approach, it is important to ensure that this is balanced with supporting the needs of the rural economy as set out at draft LPR Policy DC32. The NPPF sets out a positive approach towards supporting the rural economy and is clear that planning policies should enable <i>‘the sustainable growth and expansion of all types of business in rural areas’</i> (paragraph 83). It is therefore important that the LPR does not restrict rural employment development in rural areas and that draft LPR Policies DC31 and DC32 are applied together.</p> <p>Draft LPR Policy DC31 also supports proposals for business uses <i>‘outside of Designated Employment Areas’</i> which are compatible with surrounding uses and does not have harmful highways or amenity impacts. It is assumed that this wording relates to sites close to DEAs or within the urban area, rather than the wider rural area (more specifically covered by draft LPR Policy DC32), and therefore further clarification is required.</p>	<p>Comments noted. The policy will be amended to provide clarity.</p> <p>Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy recognises that many rural areas host a large number of small and medium sized enterprises which are vital to providing local job opportunities and a diverse economy. The policy therefore seeks to support appropriate new or expanding businesses in the countryside, supporting sustainable economic growth within the rural areas without detriment to the environment.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council’s strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites.</p> <p>The Emerging Draft LPR policy will be amended to provide clarity and avoid duplication with other policies within the plan. Text relating to business development outside DEAs will be moved to Policy SP20, and signposted to Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy – which considers economic development,</p>

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		including office, industry, storage and distribution, in the countryside.
Deloitte on behalf of Green Park Reading No.1 LLP (lpr2030)	<p><i>Full representation attached in relation to expansion of Green Park, Reading.</i></p> <p>Whilst Policy DC31 states that proposals for business uses outside the District's defined Designated Employment Areas will be permitted subject to various criteria, any new business uses in the Green Park area would need to address the sequential test set out in Policy DC20. This creates a potential barrier to the long-term investment and sustainable growth of the Park.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites.</p> <p>Whilst the Emerging Draft LPR Policy SP20 will be amended to remove the requirement for office developments within a DEA to satisfy the sequential test, proposals for office development not within a DEA or town or district centre will be required to satisfy the sequential test.</p>
Ptarmigan Group (lpr2347)	Draft Policy DC31 relates to DEAs and states that proposals for employment uses will continue to be focused within DEAs. This is a logical and sustainable approach and aligns with Section 6 (Building a strong, competitive economy) of the NPPF.	Comments noted. No changes to the policy are required in light of this representation.
Pro Vision on behalf of Wasing Estate (lpr2069)	<p>In relation to Larkwhistle Farm, Brimpton (full representation attached)</p> <p>Draft Policy DC31 states that proposals for employment uses will continue to be focused within the District's Designated Employment Areas. We consider the LPR should not rely heavily on existing and Designated Employment Sites to meet the identified requirements. The Council should be flexible and consider if additional land can be identified, as noted in the Employment Land Review.</p> <p>Nonetheless, although no specific sites are identified, draft Policy DC31 does allow for business uses outside of the District's defined Designated</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Employment Areas where they are compatible with uses in the surrounding area and do not result in conflict from vehicular movement and/or with the amenity of neighbouring occupiers. We support this allowance and flexibility.</p> <p>Larkwhistle Farm is within close proximity (approximately 600m) to Calleva Park, a Designated Employment Area and could be seen as an extension to this Area. Employment uses at the site would be compatible with the uses in the surrounding area, as described above and therefore would not result in conflict with these neighbouring occupiers.</p> <p>The site is of a sufficient distance away from existing residential development as well as there being intervening fields, meaning there would be no harm to residential amenity. This accords with draft Policy DC31.</p>	<p>The Emerging Draft LPR policy will be amended to provide clarity and avoid duplication with other policies within the plan. Text relating to business development outside DEAs will be moved to Policy SP20, and signposted to Proposed Submission LPR Policy DM35 – Sustaining a Prosperous Rural Economy – which considers economic development, including office, industry, storage and distribution, in the countryside.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment uses. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p>
Savills on behalf of Lambourn Business Park (lpr2106)	<p>We write on behalf of Lambourn Business Park. The Park provides office, storage and industrial space, south of Lambourn itself in Lambourn Woodlands (close to Membury). The Business Park focuses on providing flexible, cost effective accommodation for local businesses. It enjoys a strong location between Swindon and Newbury and close to Junction 14 of the M4. Full details can be seen at <a href="http://lambournbusinesspark.co.uk">lambournbusinesspark.co.uk</a>.</p> <p>The estate was formerly known as Lowesdon Works but has since been rebranded. Accordingly the site is identified as a Designated Employment Area (Appendix 6) as Lowesdon Works and we would request that the Local Plan is updated to identify the site as Lambourn Business Park.</p> <p>We support the identification of the site as a Designated Employment Area. However, we request that the Local Plan Review reflects the contribution that the Lambourn Business Park could make to the West Berks economy.</p> <p>We note that the Local Plan Review suggests extensions to various Designated Employment Areas at Thatcham, Aldermaston and the Membury Industrial Estate at Lambourn Woodlands. There appears to be no justification as to why these Designated Employment Areas are considered</p>	<p>Comments noted.</p> <p>This representation is a duplicate of the representation made on Emerging Draft LPR Policy SP21. See the Council's response to this representation on Emerging Draft LPR Policy SP21 (ref: lpr2105).</p> <p>The policy will be amended to reflect the rebranding of the site.</p> <p>Sites identified through the HELAA, the call for sites, and Regulation 18 consultation have been assessed for their potential to be allocated for employment uses. All site assessments can be found in the HELAA and the site selection process is documented within the SA/SEA published alongside the Regulation 19 consultation.</p> <p>As part of the evidence base which informs the LPR the Council has undertaken a review of the District's Protected Employment Areas, to be renamed Designated</p>



Respondent (with lpr ref)	Response	Council Response
	<p>to be appropriate for expansion whilst the Lambourn Business Park is not considered appropriate. We consider that the Lambourn Business Park is entirely suitable for expansion and indeed enjoys an extant planning permission for new building. The Local Plan Review should be updated to reflect this.</p> <p>Changes to be made/preferred approach: There are two potential areas for expansion at the Lambourn Business Park. The first area (shown in blue) would expand the site up to the built form and tree boundary at the western edge of the site. Most of this land benefits from an extant planning permission for development (planning reference APP/W0340/A/12/2177100 (LPA ref 11/01822/OUTMAJ) for erection of buildings to accommodate “increased storage and warehousing facilities and ancillary training and office facilities, associated car parking, landscaping, surface water drainage storage, and associated works”). At the very least, the Local Plan Review should be updated to reflect the extant planning permission.</p> <p>Additionally there is the potential to expand the Lambourn Business Park southwards as far as the existing southernmost part of development (shown in green).</p> <p>The expansion of the Lambourn Business Park would contribute to the identified need for c60,000 sq m of industrial floorspace over the plan period. It would build on the success of an existing Designated Employment Area in a location that has proven to be successful. Additional floorspace at the Lambourn Business Park would give the employment area greater critical mass and increase its attractiveness to local businesses. Other employment areas within West Berkshire have been identified for expansion and there is no reason why the Lambourn Business Park should not also be considered.</p> <p>The NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity (paragraph 80). Paragraph 84 states that planning policies and decisions should recognise that sites to meet local business needs in rural areas may have to</p>	<p>Employment Areas (DEAs) through the LPR process. As part of this work, the Lowesdon Works (Lambourn Business Park) site including the parcels of land identified within this representation has been considered and subject to a landscape sensitivity and capacity assessment. The conclusions of the DEA review work and Landscape Sensitivity and Capacity Assessment will be published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>be found adjacent to or beyond existing settlements. The identification of a small expansion of Lambourn Business Park would accord with those policy adjectives.</p>	
<p>Bell Cornwell on behalf of Kerridge Properties Ltd (lpr2129)</p>	<p>Policy is not supported.</p> <p>(In relation to land at Charnham Park, Hungerford - <i>see attached for full representation</i>)</p> <p>These representations are submitted on behalf of our client Kerridge Properties Ltd in response to the current consultation on the Regulation 18 version of the emerging West Berkshire Local Plan.</p> <p>On their behalf, we are promoting an area of land at Charnham Park in Hungerford as suitable for removal from the proposed boundary of the Designated Employment Area (DEA) in this location.</p> <p>The site is currently included within the Protected Employment Area (PEA) of Charnham Park. This is a long-standing planning designation which seeks (in summary) to protect land within the employment area for uses within the historic B use classes (business, general industrial and storage/distribution). The land has not come forward for an employment use despite being included within an employment area for over 20 years.</p> <p>We therefore seek the removal of the land from this restrictive use to give additional flexibility for the site to be developed for an alternative use. Our clients would seek a use which was compatible with the area and, in any case, the relationship of any proposal with the surrounding uses would be fully assessed as part of the development management process.</p> <p>We consider that the information that we will set out within these representations provides a robust support of our client's position and that making this change to the boundary would be a justified strategy which would increase the effectiveness of the Local Plan.</p> <p>The proposed amendment would also be consistent with national policy. We</p>	<p>Comments noted.</p> <p>This representation is a duplicate of the representation made on Emerging Draft LPR Policy SP20. See the Council's response to this representation on Emerging Draft LPR Policy SP20.</p> <p>As part of the evidence base which informs the Local Plan Review the Council has undertaken a review of the District's Protected Employment Areas, to be renamed Designated Employment Areas (DEAs) through the LPR process. As part of this work, Charnham Park and the parcel of land submitted within this representation has been considered. The conclusions of the DEA review work will be published alongside the Regulation 19 consultation.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>will refer to the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) on the issue of the effective use of land and evidence regarding whether land should be reallocated for a more deliverable use.</p> <p>We show below, for ease of reference, the area of land which we are promoting as suitable for removal from the proposed Designated Employment Area (DEA) at Charnham Park. We also include a full sized version of this plan as Appendix A. <i>See attached</i></p> <p>The red hatched area is the undeveloped area of land that we are seeking to be excluded from the DEA. This is shown on the plan in two parcels – Parcel A is to the north of the pipeline and measures 2264 sqm. Parcel B measures 5970 sqm. The blue area is other land within our client’s ownership at Charnham Park.</p> <p>It can be seen that the land is split by a fuel pipeline which runs directly to Heathrow. This cannot be moved and has to be protected in perpetuity. The undeveloped land runs to the south of the pipeline. The area also extends to the north of the pipeline. This area is also generally unmade and currently used as overflow parking by CDK.</p> <p>Whilst we seek the removal of all of the hatched area, if the Council does not consider that this would be a justified amendment to the DEA then we would be willing to accept the release of Area B in isolation.</p> <p>Site History</p> <p>The site lies on part of an extant permission for B1 uses as permitted under application reference 01/01227/ful. Part of this has been implemented and comprises the office block to the north of the application site. 01/01227/ful. Erection of Headquarters B1 development (6158m2) comprising research and development facilities, management training centre plus ASP centre plus 217 car parking spaces Erection of 2 storey Amenity and Recreation Building (2035m2) plus parking. This was granted consent in</p>	

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	<p>2003 but only partially implemented through the construction of an office block to the north of the site.</p> <p>10/00845/COMIND. This was an application for a 65-bed hotel development including ancillary facilities and a restaurant, together with 42 car parking spaces for the hotel plus a further 23 spaces to be shared with the adjoining offices to the rear.</p> <p>The proposal was on part of the land covered by the extant B1 consent from 2001. The application was refused by the Council but won on appeal. The appeal decision concluded that <i>the hotel proposal would provide for employment generating development which would make a positive contribution to the local tourism industry and the economy of the area, and meet the objectives of up to date Government policy</i></p> <p>The appeal Inspector also concluded that the site was in a sustainable location and that the hotel proposal would not be harmful to the AONB or to the character or appearance of the Kennet and Avon canal.</p> <p>Whilst the consent has been implemented in planning terms, it has not, however, been delivered for a hotel use.</p> <p>It is also relevant that our client successfully appealed a refusal by the Council (and won partial costs) for the change of use of a former children's creche (use class D1) at the adjacent Herongate Leisure Centre to 4 serviced apartments (use class C1). This was application reference 19/00429/FUL from 2019. The Inspector stated that: <i>it is apparent that uses falling outside the B Classes of the UCO have been found acceptable within the area that is the subject of the employment designation.</i></p> <p>The Council has demonstrated inflexibility on an ongoing basis with regard to the interpretation of its employment policy, which has led to suitable proposals outside of business uses being refused by the Council but won at appeal. This gives a considerable additional degree of uncertainty and</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>potential high costs when considering the future use of the site. This is off-putting for future operators when considering the potential of the site.</p> <p>No development in the historic B use classes has come forward on the site outside the original B1 office consent which was granted 20 years ago. By continuing to restrict development on the site on an ongoing basis by applying an out of date policy position, the Council is rendering the land unusable. This is not a proactive response, nor is it responsive to the changing working environment or the wider needs of Hungerford Town.</p> <p>Emerging Policy and Evidence</p> <p>Within the extant development plan, the site currently lies within a Protected Employment Area (PEA) and the policy approach to development within the PEAs is set out in policy CS9 of the adopted Core Strategy (Location and Type of Business Development). This policy, in turn, replaced policy ECON 1 of the 'old' West Berkshire Local Plan, but did not update the boundaries of the employment areas.</p> <p>The supporting text to policy CS9 confirms that 'a comprehensive assessment of existing Protected Employment Areas and their boundaries will take place as part of the Site Allocations and Delivery DPD.....evidence such as business surveys, Annual Monitoring Reports and the composition of each Protected Employment Area including the age, quality, location and capacity of sites and premises must be taken into account, together with the surrounding uses'.</p> <p>The Protected Employment Areas are now becoming Designated Employment Areas (DEAs) in the emerging Local Plan. Whilst some areas are proposed as new DEAs, the Council does not appear to have reviewed the boundaries of the existing PEAs in detail to see if any areas should be removed from them. This did not take place through the Site Allocations and Delivery DPD either. Policy CS9 of the Core Strategy was found sound on the basis that the policy set out a clear framework for the detailed review of the employment areas within a short period of time. This has not happened.</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>The Council's evidence base to support the employment policy is the Employment Land Review, which was prepared by Stantec and published in August 2020, but this work does not seem particularly detailed or granular with regard to boundary reviews, or consider why parts of existing employment sites have not come forward for development.</p> <p>We disagree with the Council's approach to largely 'carrying over' the geographical extent of the employment site boundaries. These are now very old and were defined either through the 'old' Local Plan which was adopted in 2002 – or at same date prior to that. They are therefore considerably out of date and should be proactively reviewed in detail against a transparent and consistent set of criteria as part of the emerging Local Plan process to ensure that they are fit for purpose.</p> <p>With regard to Charnham Park, the Employment Land Review states that there is one undeveloped parcel which has consent for a hotel. It does not explain that this consent was granted on appeal in 2011 and has not yet come forward, or raise any suggestions about why this land has remained undeveloped. This is not helpful, nor positive. The ELR also states that the adjacent Charnham Lane employment area should be included within the DEA. However, this recommendation does not appear to have been accepted by the Council.</p> <p>The emerging policy to manage development in the DEAs is policy DC11. This has the same principles as extant policy CS9, however the national policy has evolved since that policy was adopted in 2012. We do not consider that the Council's approach is fully in conformity with national policy as we set out below.</p> <p>The NPPF (2019) chapter 11 seeks an effective use of land. Paragraph 120 is particularly relevant. This states that:</p> <p><i>Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans and of land availability. Where the local planning</i></p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>authority considers there is no reasonable prospect of an application coming forward for the use allocated in a plan:</i></p> <p><i>a) They should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</i></p> <p><i>b) In the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.</i></p> <p>We note that the Council has been reluctant to permit applications for alternative uses on the land, despite the evidence which demonstrates that the site is unlikely to come forward or the fact that alternative uses can provide significant wider benefits to the employment area (as has been accepted elsewhere).</p> <p>Given that the site has not been developed since it was designated (at least 20 years ago) our assessment is that there is no realistic prospect that it will now come forward for the business uses envisaged by the Council.</p> <p>The Planning Practice Guidance (Paragraph: 001 Reference ID: 66-001-20190722) that provides additional information about how to deliver the NPPF confirms what needs to be taken into account when considering whether or not an allocated site is likely to come forward for its intended use. These matters include the following:</p> <ul style="list-style-type: none"> <li>• the length of time since the site was allocated in the development plan;</li> <li>• the planning history of the site including any planning applications or pre-application enquiries;</li> <li>• whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price; and</li> <li>• whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.</li> </ul> <p>In response to these matters, we have explained how the site was allocated over 20 years ago and has not been developed for either employment use or employment generating use to date. Whilst there have been a couple of</p>	

Respondent (with lpr ref)	Response	Council Response
	<p>planning applications, one (for business use) was only partially implemented due to a change of ownership and the hotel consent (won at appeal) has not been taken up and is now ten years old. This is despite active marketing by Kerridge Properties Ltd on both a sale and lease basis. Given changing working practices in recent times, it is even less likely that the site will be taken up for a business use.</p> <p>Our assessment is that continuing to include the site within the Designated Employment Area boundary would not be consistent with national policy. Given the information set out above, the Council should revise the boundary of the DEA to remove the site, either in full, or part, to allow it to come forward for an alternative use.</p> <p>Conclusion</p> <p>We seek the removal of an area of land at Charnham Park (either in full or part) from the Charnham Park Designated Employment Area to give flexibility to bring the site forward for alternative uses.</p> <p>We have explained in these representations that despite being included within the boundary of the Charnham Park employment area for at least twenty years, the site has not been developed to date for either employment or hotel uses, although it has been marketed on an ongoing basis. There have not been any planning applications on the site for a number of years.</p> <p>The site is in an important road frontage location, and should be seen as part of the gateway to Hungerford. It now needs to be considered positively, rather than artificially restricted by a historic policy approach, to allow an appropriate development can come forward.</p> <p>Given the history and the active encouragement within national policy and guidance to ensure effective use of land, the Council should not continue apply a designation to this land which simply is not proving to be attractive to the market.</p>	



Respondent (with lpr ref)	Response	Council Response
	<p>A more detailed approach to reviewing the boundaries of the employment sites in the District to ensure that they are fit for purpose would be a justified and effective way forward for the Local Plan Review. It is very clear that the policy approach to an unused site, with a road frontage in a prime location, must be reconsidered.</p>	
<p>Pro Vision on behalf of Greenham Trust Ltd (lpr2369)</p>	<p><i>*see attached for full representation*</i></p> <p>This representation on the Local Plan Review (LPR) is made on behalf of Greenham Trust (the Trust), specifically in regard to its interests at Greenham Business Park (GBP) as the major land owner and manager of the park.</p> <p>As such, the Trust is a stakeholder in the local plan process and is keen to engage proactively with the Council and other stakeholders to assist with preparing a positive and deliverable local plan to meet development needs in sustainable way over the plan period.</p> <p>In summary, these representations state that:</p> <ul style="list-style-type: none"> <li>• The Trust supports the proposal to continue to recognise the importance of GBP to the economy by identifying it as a Designated Employment Area;</li> <li>• The LPR should expressly recognise that there is an adopted Local Development Order at GBP;</li> <li>• That GBP can continue to play an important role in meeting the identified need for office and industrial space over the plan period;</li> <li>• The employment evidence and LPR policies will need to be updated to factor in the emerging impacts of the COVID-19 pandemic;</li> <li>• It is important that the standards for development imposed through policy take, to tackle the causes of climate change for example, take into account feasibility and viability at the plan-making stage.</li> </ul> <p>It is noted that specific development management matters for the DEAs are proposed in draft Policy DC 31. We would welcome clarification in draft Policy SP 21 that draft Policy DC 31 applies to the existing DEAs.</p>	<p>Comments noted.</p> <p>This representation is a duplicate of the representation made on Emerging Draft LPR Policy SP21. See the Council's response to this representation on Emerging Draft LPR Policy SP21 (ref: lpr2366).</p> <p>Text will be added to the LPR to recognise the current Local Development Order for Greenham Business Park.</p> <p>The Council recognise the contribution that Greenham Business Park makes to the local economy, and in accordance with the recommendations set out in the Council's evidence base, the ELR 2020, it is proposed that the site becomes a DEA.</p> <p>Emerging Draft LPR Policies SP20 and SP21 set out the Council's strategic approach to business development, which seeks to encourage such development to locate within settlement boundaries and Designated Employment Areas (DEAs), as well as existing employment locations and allocated sites. The policies also identify some existing employment locations, including Greenham Business Park, as new DEAs.</p> <p>This policy relates to DEAs, their role and function as well as the uses permitted within these areas. They are locations across the District designated for business development, and for the purposes of the LPR business development relates to offices, industry, storage and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The element of flexibility added to draft Policy DC 31, allowing some “small scale commercial and service uses” within DEAs is generally supported, recognising that modern business environments thrive where there is a mix of complementary uses.</p> <p>However, the draft policy states that “Proposals that would result in the net loss of employment floorspace will not be supported”. The Trust has concern that this could mean a lack of support for occasions where old, redundant floorspace, perhaps office space or industrial space, is redeveloped to meet modern standards for alternative employment land, such as R&amp;D or logistics, or to meet other economic development needs, for example data centres. Therefore, the policy should amend “floorspace” to “land”.</p> <p>Draft Policy DC 31, and other relevant policies, should be reviewed with the benefit of an updated assessment. One implication may be, for example, greater flexibility over the appropriate uses in DEAs to deliver the flexibility and adaptability that the changing market is likely to need as it rebounds.</p> <p>Summary and conclusion</p> <p>Greenham Trust is the major owner and manager of Greenham Business Park, one of the primary employment areas in the district.</p> <p>It is welcomed that the significance of the business park will continue to be recognised in the local plan by designation as a Designated Employment Area, and that the plan will continue to direct new employment development to these areas.</p> <p>The employment evidence base will need to be reviewed to factor-in the emerging impacts of the COVID-19 pandemic. Policies of the LPR, including draft Policy DC 31, should be reviewed in light of updated evidence.</p>	<p>distribution uses. This policy applies to all DEAs within the District, existing and new.</p> <p>The policy will be amended with regard to the loss of floorspace within DEAs. The evidence clearly points to safeguarding land/floorspace particularly in DEAs for office, industry, storage and distribution uses. As such, the policy will be amended and will support the regeneration and redevelopment of DEAs to provide additional employment development (office, industry, storage and distribution) that meets the needs of the District.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p> <p>The LPR has been subject to whole plan viability in accordance with the NPPF. The whole plan viability assessment concluded that the delivery of economic development and employment floorspace would be viable taking into account other policy requirements within the plan. The Whole Plan Viability Assessment can be found as part of the evidence base.</p> <p>It is important that development proposals take into account climate change from the outset, including in costings. Technologies are likely to become more available and cheaper in the coming years. Tackling climate change through site and building design is one of the most important ways in reducing carbon output and</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The LPR should recognise the adopted Local Development Order as an important part of the economic strategy, a positive planning tool to boost the local economy and optimising the potential of the business park.</p> <p>The LPR should be reviewed in respect of viability and other relevant evidence to underpin policy requirements so that development needs are delivered over the plan period while also addressing key issues including tackling the causes and impacts of climate change.</p>	genuinely enabling each development to contribute to combating the effects of climate change.
West Berkshire Council as landowner of London Road Industrial Estate (LRIE) (LATE SUBMISSION)	<p><b>Propose the renaming of the LRIE DEA.</b> There is the potential for confusion between the existing London Road Industrial Estate DEA which includes the adjoining Riverpark Industrial Estate, and the area within the Council's freehold ownership for which the Council as landowner has aspirations – also known as the London Road Industrial Estate (expected to be renamed in early 2023). This should be addressed either by renaming the DEA or by providing clarification within the supporting text.</p> <p><b>If not included in supporting text for SP21 as proposed above,</b> propose expansion of para 12.7 in the supporting text with the following wording, to align with the Council as landowner's aspirations for the LRIE site as set out in Executive Report EX4219 approved on 9 June 2022 and supporting documents, available at <a href="https://info.westberks.gov.uk/lrie">https://info.westberks.gov.uk/lrie</a>:</p> <p><i>12.7 In addition, the London Road Industrial Estate has scope for <del>comprehensive regeneration</del> intensification of employment use within the plan period to maximise the potential of the site. Some mixed use development may be appropriate in the context, such that no net loss of employment floorspace results from that development.</i></p> <p><i><u>"The Council-owned London Road Industrial Estate (LRIE) currently has an estimated 23,000 sqm of employment space (Avison Young</u></i></p>	<p>(LATE SUBMISSION) Comments noted.</p> <p>There is a subtle difference between the names as the DEA is titled 'London Road Industrial Estates', which includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate. Given the Council expect the name of the Council owned land to change in early 2023, it is not proposed to amend the name of the DEA in the LPR. Proposed Submission LPR Policy SP20 will address this matter within the supporting text, along with the current status of the LRIE.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><u>Development Brief 2020) occupied by 36 businesses that employ about 300 people. Following a review taking into account evolving economic drivers, market demand and the district's ambition to be carbon neutral by 2030, a revised Delivery Strategy for LRIE approved by Executive on 9/6/22 aims to increase employment floorspace on the site by at least 30%, safeguard 300 jobs and create at least 200 new jobs by 2030.</u></p> <p><u>The Council as freeholder will work with leaseholders to deliver environmental enhancements on the site including on carbon net zero, nutrient neutrality, sustainable drainage and biodiversity net gain. Further details to be set out in an LRIE Place-making Strategy which will be submitted as a Supplementary Planning Document in due course and progressed through the statutory planning process in parallel with the Local Plan Review."</u></p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC32 Supporting the Rural Economy

#### (Proposed Submission LPR Policy: DM35 Sustaining a prosperous rural economy)

Number of responses received: 16

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Shaw cum Donnington Parish Council (lpr258)	We support the policy.	Comments noted.
Stratfield Mortimer Parish Council (lpr440)	Policy is supported.	Comments noted.
Greenham Parish Council (lpr932)	Policy is supported.	Comments noted.
Newbury Town Council (lpr2225)	<p>We support the policy. However, there is lack of clarity about the definition or “rural” in this context. Market towns like Newbury, Thatcham and Hungerford are integral to the “rural economy” but the policy appears to be intended to relate purely to businesses located in what in planning terms is “open countryside” and not in “settlements” at or near the top of the hierarchy used in this Plan.</p> <p><b>Reason:</b> this policy should not exclude development in larger settlements across the District which genuinely support “rural business” (e.g. breweries) but should make it clearer under what circumstances a development proposal that doesn’t need to be located in the countryside might be permitted.</p>	<p>Comments noted.</p> <p>The policy is specifically for economic development in the countryside, for locations outside of settlement boundaries.</p> <p>The policy does not exclude development in larger settlements, but as development in rural areas is generally more restrictive, the policy is aimed at providing opportunities for particular development, and in particular circumstances in rural areas. The principle of developing in the settlement boundaries of market towns (Newbury, Thatcham, Hungerford) is generally supported, and</p>

Respondent (with lpr ref)	Response	Council Response
		therefore does not require a specific policy. As part of the submission version of the Plan there will be a specific policy for local community facilities.
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr96)	<p>Policy is supported.</p> <p>The AONB (which could be equally termed an Area of Outstanding Cultivated Landscape) is not a self-sustaining resource but is maintained by the rural businesses located in it. To do this, the local businesses must remain viable and this will require them to grow and develop. Such appropriate development should be allowed for expressly.</p>	Comments noted. No changes are proposed based on these comments.
British Horse Society (lpr862)	<p>Policy is not supported.</p> <p>Para 12.20 infers that this statement also relates to public rights of way (byways, restricted byways, bridleways and footpaths) and thus the Society suggests that public rights of way are included in policy statement vii. Increase of motor traffic on rural roads, including commercial vehicles, is the main factor in deterring non-motorised travel on rural roads. In addition, changes to public rights of way to accommodate motor traffic generated by developments can make these unattractive to equestrians.</p> <p>12.13: it is odd to just refer to the racehorse industry here when DC34 refers to the whole horse industry ie racing and non-racing horse industry. We suspect that there is a lack of awareness locally of the economic contribution that the non-racing horse industry makes to the local rural economy and the number of farmers who have diversified, and continue to diversify, into non-racing horse enterprises using redundant farm buildings and land for horse keeping. Please see points under DC34.</p> <p>Changes to be made/preferred approach: <i>viii: it would not generate traffic of a type or amount inappropriate for the rural roads <b>and public rights of way (byways, restricted byways, bridleways and footpaths)</b> affected</i></p>	<p>Comments noted.</p> <p>Policy SP10 (Green Infrastructure) seeks to protect and enhance Green Infrastructure assets, which include public rights of way. However, in consideration of the points raised by the consultee it is byways and restricted byways which may be affected rather than footpaths and bridleways.</p> <p>Proposed changes:</p> <p>Criterion h) (submission version): 'it would not generate traffic of a type or amount inappropriate for the rural roads <u>and byways and restricted byways</u> affected by the proposal or require improvements to these roads and public rights of way which could be detrimental to their character <u>and use by motorised and non-motorised traffic</u>'</p> <p>Delete paragraph 12.13 (emerging draft version) as these matters are now covered in other policies.</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>by the proposal or require improvements to these roads and public rights of way which could be detrimental to their character &amp; use by motorised and non-motorised traffic'</i></p> <p>12.13 'The <del>racehorse</del><b>horse</b> industry and tourism also make a vital contribution to the local economy, as do educational and institutional establishments including boarding schools. All sectors of the rural economy are covered by this policy, which seeks to foster economic growth without detriment to the environment'</p>	<p><del>12.13 'The racehorse industry and tourism also make a vital contribution to the local economy, as do educational and institutional establishments including boarding schools. All sectors of the rural economy are covered by this policy, which seeks to foster economic growth without detriment to the environment'.</del></p> <p>The supporting text is considered appropriate to remain.</p>
Canal and River Trust (lpr907)	<p>Policy is not supported.</p> <p>This policy allows for development that support the rural economy, but specifically refers to land based development and so apparently would not be relevant to marina applications, or boating related businesses in general. It should be recognised that many boating related businesses are non-footloose, due to needing to be located adjacent to the canal, and so need to be located outside of a settlement boundary.</p> <p>Changes to be made/preferred approach: Remove the reference to land based business in the first sentence, or include water based too.</p>	<p>Comments noted.</p> <p>The policy is proposed to be altered to remove the first paragraph.</p> <p>Policy SP10 relating to Green Infrastructure is also considered to apply to 'blue infrastructure' and so the Local Plan has an approach to examples as provided by the Canal and River Trust.</p>
Mid and West Berkshire Local Access Forum (lpr1890)	<p>Para 12.20 infers that this statement also relates to public rights of way (byways, restricted byways, bridleways and footpaths) and thus MWBLAF suggests that public rights of way are explicitly included in policy statement viii.</p> <p>Increase of motor traffic on rural roads, including commercial vehicles, is the main factor in deterring non-motorised travel on these roads. In addition, changes to public rights of way to accommodate motor traffic generated by developments can make these unattractive to non-motorised users.</p> <p>The Forum supports the statement in paragraph 12.20 on 'rural tracks, footpaths and bridleways'. However, this sentence is unnecessary if section viii. in the policy is amended as suggested above. As written, it is unclear</p>	<p>Comments noted.</p> <p>Policy SP10 (Green Infrastructure) seeks to protect and enhance Green Infrastructure assets, which include public rights of way. However, in consideration of the points raised by the consultee it is byways and restricted byways which may be affected rather than footpaths and bridleways.</p> <p>As per response to comment lpr862, proposed changes:</p> <p>Criterion h) (submission version): 'it would not generate traffic of a type or amount inappropriate for the rural roads <u>and byways and restricted byways</u>) affected by the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>what a rural track is – private or public – and whether footpaths and bridleways refer to public rights of way.</p> <p>Changes to be made/preferred approach: The Forum recommends that item viii. in the policy is clarified as follows:</p> <p><i>All proposals for development relating to rural enterprises should demonstrate that they satisfy all of the following criteria:</i></p> <p><i>viii. it would not generate traffic of a type or amount inappropriate for the rural roads <b>and public rights of way (byways, restricted byways, bridleways and footpaths)</b> affected by the proposal or require improvements to these roads which could be detrimental to their character;</i></p> <p>If this change is made, then the sentence in paragraph 12.20 should be deleted:  <i>12.20 Assessment of the highway implications will be made on the basis of the proposal and what would be considered necessary in terms of improvements by the Highway Authority. <del>The reference to ‘rural roads’ is a generic term and the Council would be concerned as to the effects of the proposed development on rural tracks, footpaths and bridleways.</del> Relevant considerations would include past and existing levels of traffic generated from the site; the level, type and frequency of traffic likely to be generated by the proposed development; and traffic levels accepted under any existing planning permission attached to the land.</i></p>	<p>proposal or require improvements to these roads and public rights of way which could be detrimental to their character <u>and use by motorised and non-motorised traffic'</u></p> <p>Delete paragraph 12.13 (emerging draft version) as these matters are now covered in other policies.</p> <p><del>12.13 'The racehorse industry and tourism also make a vital contribution to the local economy, as do educational and institutional establishments including boarding schools. All sectors of the rural economy are covered by this policy, which seeks to foster economic growth without detriment to the environment'.</del></p> <p>The supporting text is considered appropriate to remain.</p>
<b>Other stakeholders</b>		
Councillor Alan Macro (lpr768)	<p>Policy is not supported.</p> <p>"adaptation of existing buildings" would appear to allow the change of use of residential buildings.</p>	<p>Comments noted.</p> <p>The policy is specifically for development for economic purposes. The policy does not restrict the change of use away from residential. It would be for the decision maker to balance up the loss of housing with the benefit to the rural economy, and when considering SP12 which states that there should be no net losses from the existing housing stock, unless there is a reasoned justification.</p>



Respondent (with lpr ref)	Response	Council Response
Councillor Tony Vickers (lpr662)	<p>Policy is supported.</p> <p>Two comments:</p> <p>1. There is lack of clarity about the definition or “rural” in this context. Market towns like Newbury, Thatcham and Hungerford are integral to the “rural economy” but the policy appears to be intended to relate purely to businesses located in what in planning terms is “open countryside” and not in “settlements” at or near the top of the hierarchy used in this Plan. This policy should not exclude development in larger settlements across the District which genuinely support “rural business” (e.g. breweries) but should make it clearer under what circumstances a development proposal that doesn’t need to be located in the countryside might be permitted.</p> <p>2. The mention of “adaptation of existing buildings” implies that residential buildings are included. Is this the intention? It may be intentional to allow residential buildings – even in the countryside - to be converted to non-residential use to benefit the rural economy but we are not sure this is the intention.</p> <p>Changes to be made/preferred approach: We have no suggestions at this point until these comments have been dealt with.</p>	<p>Comments noted.</p> <p>The policy is specifically for economic development in the countryside, for locations outside of settlement boundaries.</p> <p>The policy is primarily aimed at rural areas, where the principle of development is generally more restrictive than in settlements. The principle of developing within the settlement boundaries of market towns (Newbury, Thatcham, Hungerford) is generally supported, and therefore does not require a specific policy. Policy DM39 considers local community facilities.</p> <p>Breweries do not have to be solely rural businesses. There are examples of breweries, microbreweries and gin distilleries within settlements in the District, which are considered against general ‘within settlement policies’.</p> <p>It is not altogether clear what types of ‘rural businesses’ which would not need to be located outside of settlements might be, and therefore it would be difficult to set out circumstances. This may also confuse the policy as it is aimed at locations outside of settlements.</p> <p>The policy is specifically for development for economic purposes. The policy does not restrict the change of use away from residential. It would be for the decision maker to balance up the loss of housing with the benefit to the rural economy, and when considering SP12 which states that there should be no net losses from the existing housing stock, unless there is a reasoned justification.</p>

Respondent (with lpr ref)	Response	Council Response
Savills on behalf of Englefield Estate (lpr542)	<p>It is noted that draft LPR Policy DC32 supports proposals for the diversification of rural businesses, <i>'provided that the applicant demonstrates that the changes will make a long-term contribution to sustaining the enterprise as a whole and meets the detailed criteria within this policy.'</i> The overall support for development relating to rural businesses is welcomed; however we are concerned that draft LPR Policy DC32 as currently worded is not consistent with the NPPF and contains a number of detailed criteria (in addition to the current Core Strategy Policy CS10) which may prejudice suitable development being delivered in rural areas.</p> <p>In particular, the requirement for proposals to justify that other existing buildings cannot be used (part iii) and to demonstrate that proposals will <i>'make a long-term contribution to sustaining the enterprise as a whole'</i> is considered to be onerous and unjustified (and indeed contrary to the NPPF). Further, the need to satisfy <i>'all'</i> of the criteria may serve to unnecessarily restrict development which through a balanced judgement is acceptable and would otherwise bring important economic, social and environmental benefits. Policy DC32 also includes a number considerations which are not unique to development in rural areas (e.g. the need for appropriate design and to control impacts on amenity, heritage and ecology) but which are covered by other LPR policies, and therefore the policy as currently worded has unnecessary repetition.</p> <p>The NPPF is clear that planning policies should <i>'enable the sustainable growth and expansion of all types of business in rural areas'</i> (paragraph 83). It is important therefore that the LPR does not seek to restrict rural employment uses, but rather takes a positive approach which supports diversification and the vitality of rural settlements.</p> <p>In this regard, it is also important to note that 2021 sees the start of the seven-year transition away from EU- based rules for agriculture and forestry businesses, which will involve cuts in support and considerable change for farming businesses, and therefore it is essential that rural diversification and associated investment is not stifled with consequent damage to the rural economy and communities.</p>	<p>Comments noted.</p> <p>It is recognised that the NPPF supports the rural economy, though this is specifically through the conversion of existing buildings and well-designed new buildings. It therefore does place some restriction on the types of development, and it appropriate that the policy seeks to manage the impact of development. This is in consideration of the landscape-led approach to the Local Plan, whilst supporting the rural economy.</p> <p>The policy would replace Core Strategy policy CS10. It is important that the applicant does demonstrate they can sustain the enterprise, and in the long term in consideration of sustaining the rural economy. This is rather than having businesses which may not succeed and leave buildings, potentially then be converted to uses which may not be appropriate in the location (e.g. residential). A business plan or documentation to show that the business is viable would be of use in demonstrating such a contribution. The supporting text (para 13.20 submission version) has been updated to the following:  <u>In demonstrating that the business can make a long term contribution to the rural economy it is expected that a business plan, whole estate plans, or similar, will be presented with a planning application. For new businesses in particular, this can aid in illustrating the viability of the proposal. It is considered necessary to demonstrate a long term contribution to avoid pressure for non-economic uses in locations which may not be suitable (e.g. residential).</u></p> <p>Whilst the Local Plan should be read as a whole the criteria in DM35 seek to draw attention to particular issues which are important to ensure development is sustainable</p>

Respondent (with lpr ref)	Response	Council Response
		<p>and appropriate in terms of location and impact on the landscape and character of the site and area.</p> <p>It is considered that the policy is positively supporting businesses in rural areas, and is flexible in its approach. It is important to ensure that development is suitable and sustainable, particularly in the AONB, and considering the accessibility of places in the District.</p> <p>A new policy, covering farm diversification, will be proposed for the submission version of the Local Plan.</p>
<p>Lucy White Planning on behalf of Bradfield College (lpr1157)</p>	<p>Policy is not supported.</p> <p>Policy DC32 is intended to control the development of rural enterprises in the open countryside, including the expansion of schools and colleges, through the provision of new academic and pastoral facilities. The policy states that:</p> <p><b>“Proposals for new or expanding rural enterprises will be permitted so long as they meet the detailed criteria within this policy. This includes proposals for leisure and visitor developments where they provide new and enhanced attractions, facilities and/or accommodation. In the case of educational and institutional establishments it must be demonstrated to the satisfaction of the Council that development is necessary to meet the reasonable needs and operational requirements of the establishment.”</b></p> <p>The policy does not clarify whether the obligation imposed upon education establishments is <b>in addition</b> to the detailed policy criteria, or <b>in lieu</b> of one or more of the criteria.</p> <p>Criteria (i) requiring development proposals to be suitable for the rural location should not apply to schools and colleges, providing criteria (iii) onwards are met to ensure the impact of the proposed development is acceptable in its location.</p>	<p>Comments noted.</p> <p>It is proposed to include a new policy for educational and institutional establishments in the countryside (DM38).</p> <p>The policy is in the same spirit as Local Plan ENV27 which this policy would replace. All of the criteria are relevant to schemes for educational establishments in the countryside.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Criteria (ii) requires the proposed development to benefit the wider economy of the rural area. Whilst, it is acknowledged that independent schools and colleges make a significant contribution to the rural and district-wide economy, this criteria is not a relevant test for school proposals, where the principal function should be to enhance or expand education facilities.</p> <p>Changes to be made/preferred approach: For the above reasons, Policy DC32 should be amended to clarify that education proposals should demonstrate that development is necessary to meet the reasonable needs and operational requirements of the establishment and criteria iii) – xi) only.</p>	
Fowler Architecture and Planning Ltd (lpr1808)	<p>The NPPF does not seek to control the growth required to support the rural economy as a matter of principle. Instead, the assessment of proposals should be managed through design, landscape, ecological and heritage policies of the Local Plan. Policy DC32 should be deleted.</p> <p>Nonetheless, as drafted, the following comments on Policy DC32 are provided.</p> <p>The opening of the policy should be consistent with paragraph 83 of the NPPF that supports the conversion of existing buildings and well-designed new buildings. As the policy explicitly references re-use or adaptation of existing buildings it puts significant focus on this option for diversification when it should also refer to well-designed new buildings. The requirement that such changes ‘will make a long-term contribution’ is incompatible with some enterprise needs for economic growth that may only be short term and temporary in nature, such as temporary housing and other interim solutions.</p> <p>It is unclear how all cases can demonstrate ‘benefit to the economy of the surrounding area’ under criterion (ii) as some growth and expansion may only benefit the holding itself.</p> <p>The second limb of criterion (iii) is unreasonable. There may be very real reasons why a business has disposed of assets. The need for a new</p>	<p>Comments noted.</p> <p>The policy is proposed to be altered to remove the first paragraph.</p> <p>It is important that the applicant does demonstrate they can sustain the enterprise, and in the long term in consideration of sustaining the rural economy. This is rather than having businesses which may not succeed and leave buildings, potentially then be converted to uses which may not be appropriate in the location (e.g. residential). A business plan or documentation to show that the business is viable would be of use in demonstrating such a contribution. The supporting text (paragraph 13.20 of the submission version) has been updated to the following:  <u>In demonstrating that the business can make a long term contribution to the rural economy it is expected that a business plan, whole estate plans, or similar, will be presented with a planning application. For new businesses in particular, this can aid in illustrating the viability of the proposal. It is considered necessary to demonstrate a long term contribution to avoid pressure for non-economic uses in locations which may not be suitable (e.g. residential).</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>building should only be assessed on the basis of the impact of the development and not the past actions of the enterprise.</p>	<p>Criterion a) (was ii emerging draft version) – delete ‘The development can make a long term contribution to sustaining the rural business as a whole’.</p> <p>Criterion d) (was iii emerging draft version) – should there be reasons why a business has disposed of assets can be considered as part of the consideration of the proposal. The policy is intended to manage the amount of new buildings in the countryside, particularly where there are existing buildings to be made use of.</p>
<p>Pegasus Planning Group Ltd on behalf of Newbury &amp; Crookham Golf Club (lpr2057)</p>	<p>Policy is not supported.</p> <p>Newbury and Crookham Golf Club (NCGC) is a rural business, located beyond the settlement boundary of Newbury, but close to many homes and local residents who make use of its attractive open spaces to play golf and enjoy the countryside. The sport of golf is currently under a great deal of pressure. Player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. In this context, there have been two recent closures; the Racecourse and Donnington Valley, the latter of which has closed to members. In addition, there are several examples of other golf courses with the Council area or in adjacent Districts and Boroughs seeking to similarly plan for their future through discreet residential development and/or diversification of the leisure offer.</p> <p>It is therefore important to plan proactively to ensure retention of sports and leisure facilities for the local community, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. NCGC is a leisure facility located in a rural area in a very accessible location. It is a business that supports 20 direct and indirect jobs, invests over £300k per annum in the local economy and maintains 50 hectares of attractive countryside, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental</p>	<p>Comments noted.</p> <p>The NPPF and Policy DM1 of the LPR consider enabling development in the context of securing the future of heritage assets. Historic England further define enabling development as development which would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact it would secure the future conservation of a heritage asset.</p> <p>Whilst there may be appeal examples and legal challenges relating to enabling development for non-heritage asset related development, this is a factor to be considered on a case by case basis, examining the evidence and consideration of housing policies (considering that DM35 is not a housing policy).</p> <p>The policy will not be changed in respect of these comments.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.</p> <p>Policy DC 32 states that proposals for development relating to rural enterprises, such as NCGC, should demonstrate that they comply with a long list of criteria. As mentioned previously, NCGC proposes to demolish and replace its existing clubhouse and car park. The new clubhouse will have much-improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements will be possible because the golf club owns 50 hectares of rural land, which offers tremendous scope for investment in the local area. It will not just be a case of allocating 2 hectares of land and getting c.35 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.</p> <p>The proposal, which is supported by England Golf, will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible in these testing times, if an enabling development of c.35 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.</p> <p>Changes to be made/preferred approach: The policy as worded does not include any reference to enabling development and the Council currently only recognises this in the context of the preservation of historic buildings. Whilst 'enabling development' is a concept set out in the NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>“I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site.</i></p> <p><i>The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide.”</i></p> <p>Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to community assets that will otherwise fail, as follows:</p> <p><i>xii. Enabling development will be permitted in circumstances where the capital generated will be used to improve the facilities of the rural enterprise, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the level of capital generated is proportionate to the cost of providing the improved facilities.</i></p> <p>Policy DC 32 - Supporting the Rural Economy is objected to in its present form. The policy needs to be amended to include the above additional criterion, which will allow for a wider and more appropriate definition of enabling development, which in turn will help to maintain rural enterprises, like NCGC, into the foreseeable future.</p>	
Rural Solutions (lpr2301)	We support the ambition of the Local Plan Review to support proposals for diversification of existing agricultural and other land based rural businesses.	Comments noted.  Criterion g) (was vi in emerging draft): It is important to manage the impact of new development on the site’s

Respondent (with lpr ref)	Response	Council Response
	<p>Proposals for new or expanding rural enterprises will also be permitted, so long as they meet the detailed criteria set out within Policy DC32.</p> <p>We are seeking some flexibility in terms of the policy criteria vi). This could be more positively worded. The policy states:</p> <p>1. <i>wherever possible, new or replacement buildings are located within or adjoining an existing group of buildings and further expansion into the countryside is avoided;</i></p> <p>When establishing a new rural enterprise, it is not always possible to locate new buildings within or adjoining an existing group of buildings. However, we can consider the landscape setting and how any new buildings will be viewed e.g. against a skyline or from higher ground. For example, a proposal could use the backdrop of an existing woodland or a mature field boundary to ensure it is carefully located, alongside appropriate materials (depending on its context) and planting to ensure the agricultural buildings blend into its setting. I would also reinforce the message that you do expect to see agricultural buildings within the countryside given it is a working landscape.</p>	<p>character and surrounding landscape. However, suitable justification, such as a landscape and visual impact assessment, may aid in determining whether an alternative location within the site would be more appropriate, which the decision taker would then take into account.</p>
Pegasus Planning Group Ltd on behalf of Calcot Park Golf Club (lpr2329)	<p>Policy is not supported.</p> <p>Calcot Park Golf Club (CPGC) is a rural business, located within the Eastern Area adjacent to many homes and local residents who make use of its attractive open spaces to play golf and visit the facilities. The sport of golf is currently under a great deal of pressure. Player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. Nevertheless, it is important for the local community to retain sports facilities, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being.</p> <p>CPGC is a leisure facility located in a rural area in a highly accessible location. It is a business that supports 32 jobs and it maintains c.81 hectares of attractive countryside, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.</p>	<p>Comments noted.</p> <p>The NPPF and Policy DM1 of the LPR consider enabling development in the context of securing the future of heritage assets. Historic England further define enabling development as development which would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact it would secure the future conservation of a heritage asset.</p> <p>Whilst there may be appeal examples and legal challenges relating to enabling development for non-heritage asset related development, this is a factor to be considered on a case by case basis, examining the evidence and consideration of housing policies (considering that DM35 is not a housing policy).</p>



Respondent (with lpr ref)	Response	Council Response
	<p>Policy DC 32 states that proposals for development relating to rural enterprises, such as CPGC, should demonstrate that they comply with a long list of criteria. As mentioned previously, CPGC proposes to demolish and replace its existing clubhouse and car park. The new clubhouse will have much improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements will be possible; the golf club ownership of c.81 hectares of rural land offers tremendous scope for investment in the local area. It will not just be a case of allocating 6 hectares of land and getting 70 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.</p> <p>A scheme of 70 dwellings is currently proposed, as this has been subject to initial assessment and identified as a quantum that could provide both the enabling development desired and a policy-compliant level of affordable housing. Therefore, should a lower quantum of housing be considered appropriate on-site further to discussions with the Council, it will need to be acknowledged that retention of long-term golf at CPGC is the scheme driver and that there will be consequential reduction in the delivery of affordable housing; to be determined by Viability Assessment.</p> <p>The proposal will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible in these testing times, if an enabling development of c.70 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide</p> <p>Changes to be made/preferred approach: The policy as worded does not include any reference to enabling development and the Council currently only recognises this in the context of the preservation of historic buildings. Whilst 'enabling development' is a concept set out in the NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal</p>	<p>The policy will not be changed in respect of these comments.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:</p> <p><i>“I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site. The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide.”</i></p> <p>Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to community assets that will otherwise fail, as follows:</p> <p><i>xii. Enabling development will be permitted in circumstances where the capital generated will be used to improve the facilities of the rural enterprise, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the level of capital generated is proportionate to the cost of providing the improved facilities.</i></p> <p>Policy DC 32 - Supporting the Rural Economy is objected to in its present form. The policy needs to be amended to include the above additional criterion, which will allow for a wider and more appropriate definition of enabling development, which in turn will help to maintain rural enterprises, like CPGC, into the foreseeable future.</p>	

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC33 Redevelopment of previously developed land in the countryside

Number of responses received: 9

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology (Sarah Orr) (lpr784)	Agree with the proposed policy. Should also include reference to heritage assets of archaeological interest which might be on the site of previously developed land - cross ref to SP9 and DC13	Comments noted.  The policy is to be amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy). The policy makes reference to heritage assets, which includes assets of archaeological interest. Reference will also be made to relevant policies in the Local Plan Review.
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (Paul Bryant) (lpr259)	Support the policy.	Comments noted.
Stratfield Mortimer Parish Council (Lynn Hannawin) (lpr441)	Support the policy.	Comments noted.
Greenham Parish Council (Clerk) (lpr934)	Would like to add two changes to the policy. Proposed changes: <ul style="list-style-type: none"> <li>In the first line of the policy delete “existing buildings on”</li> <li>Start “i)” with “The land or any existing buildings are ...”</li> </ul>	Comments noted.  The policy is to be amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy). It is important

Respondent (with lpr ref)	Response	Council Response
		to limit the impact of development on the site and surrounding landscape, and although the NPPF's definition of previously developed land includes the curtilage of land which is or was occupied by a permanent structure, the policy seeks to limit the extent of building in the site itself to reduce impact on the landscape.
<b>General consultation bodies</b>		
NA		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr663)	<p>We support this policy, but it should be made clear that it applies not just to land with buildings on it but also to land where there may be no trace or record of what building[s] previously existed.</p> <p>All that should be needed to enable development to occur in accordance with DC 1 and this policy is the existence of a hard and stable man-made foundation of no archaeological value.</p> <p>1) In the first line of the policy delete "existing buildings on" 2) Start "i)" with "The land or any existing buildings are ..."</p>	<p>Comments noted. Land with no trace or record of what building(s) previously existed is excluded from the NPPF's definition of previously developed land, and therefore the development on such land would not be compliant with the policy.</p> <p>The policy is to be amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy), which shall include allowance for the redevelopment of existing buildings for economic development in the countryside. It is important to limit the impact of development on the site and surrounding landscape, and although the NPPF's definition of previously developed land includes the curtilage of land which is or was occupied by a permanent structure, the policy seeks to limit the extent of building in the site itself, unless justified, to reduce impact on the landscape.</p>
<b>Landowners, site promoters and developers</b>		
Savills for Englefield Estate Office (lpr1543)	It is noted from LPR paragraph 12.21 that draft LPR Policy DC33 relates to the rural economy and not residential uses and therefore it is recommended that additional clarity is provided within the policy wording itself.	<p>Comments noted.</p> <p>The policy is to be amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy). This is</p>

Respondent (with lpr ref)	Response	Council Response
	<p>As per our comments regarding Policy DC32 above, the overall support for the redevelopment of existing buildings in the countryside is welcomed, however we are concerned that the wording of draft LPR Policy DC33 is not consistent with the NPPF and may prejudice suitable development being delivered in rural areas. In particular it is noted that draft LPR Policy DC33 refers only to allowing <i>'limited'</i> redevelopment to enable the <i>'sustainable growth'</i> of rural businesses, and requires that the redevelopment proposal <i>'has no greater impact'</i> (including in terms of size) than the existing development. The NPPF (paragraph 83), however, does not seek to restrict rural employment uses but rather encourages policies to allow for the <i>'sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well- designed new buildings'</i> [our emphasis]. It is important therefore that this positive approach is reflected in draft LPR Policy DC33 and that the wording is revised accordingly, to omit specific restrictions on the scale of development but rather to encourage appropriate and sustainable development.</p> <p>Similarly as above, the criteria within draft Policy LPR DC33 includes unnecessary repetition based on the provisions of other policies within the LPR, and the need to satisfy 'all' of the criteria may serve to unnecessarily restrict redevelopment which through a balanced judgement is deemed acceptable.</p> <p>In addition, draft LPR Policy DC33 adds that particular regard will be had to the accessibility of development and relationship to existing settlements and services. Whilst paragraph 84 of the NPPF encourages use of previously developed land which is well-related to existing settlements, this guidance also makes clear that, 'planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.' The wording of draft LPR Policy DC33 should be amended to reflect this. Further, it is therefore important to ensure that a balanced approach is taken to considering the redevelopment of previously developed land in the countryside and that the appropriate redevelopment of rural sites is not prevented</p>	<p>specifically for economic development projects in the countryside, and not for residential development. The policy seeks to ensure that new, redeveloped or adapted buildings are appropriate in their setting, and are designed to reflect their setting. It is recognised that the NPPF supports the sustainable growth and expansion of businesses in rural areas, though this needs to be reconciled with another aim of the NPPF, which refers to the need to recognise the intrinsic character and beauty of the countryside and protect and enhance valued landscapes such as the AONB (para 170). The policy attempts to strike a balance between allowing certain development in the countryside against the need to protect the qualities of the countryside.</p> <p>For the above reasons it is considered appropriate that all of the criteria are met. Decisions are made in line with development plan policies unless material considerations indicate otherwise. Any material considerations will therefore need to be taken into account by the decision maker and weighed in the balance.</p> <p>It is recognised that the NPPF outlines that not all rural businesses and community projects will be in locations served by public transport. However, proposals for economic development proposals in the countryside will need to take account of LPR Policies SP3 and DM1, and active and sustainable methods of transport will be encouraged.</p>

Respondent (with lpr ref)	Response	Council Response
Fowler Architecture & Planning Ltd	<p>The inclusion of a policy that is supportive of previously developed land (PDL) in the countryside is welcomed.</p> <p>The wording of DC33 infers that appropriate limited redevelopment relates only to the replacement of existing buildings on PDL, ultimately on a like-for-like basis. This fails to properly grasp the opportunities to utilise the rare resource of PDL as encouraged by paragraphs 84, 117 and 118 of the NPPF.</p> <p>The policy should not prohibit optimising PDL if it has a capacity to absorb change with a greater amount of buildings than presently exists, given the extent of the curtilage of PDL, hardstanding and storage.</p> <p>Criterion (i) requires the building be proven as ‘genuinely redundant or disused’. The term ‘genuinely’ is ambiguous (see paragraphs 8 and 9 of Appeal APP/W0340/W/17/3185410) and needs to be further clarified at paragraph 12.25 as this does not provide a precise definition on how this test will be applied to decisions, because they introduce other ambiguous terms such as ‘significant efforts’. If it is the Council’s expectation that marketing be required then this should be stated.</p> <p>Criterion (i) is also imprecise as to its natural meaning, and it should be clear that the replacement to which this refers is replacement of the original form of development elsewhere.</p> <p>The final paragraph refers to the accessibility of a site in the countryside to its location and its relationship to the settlement hierarchy, however paragraph 84 of the NPPF recognises that sites to meet local business and community needs in rural areas may have to be found beyond existing settlements. The final part of paragraph 84 does not require the use of PDL to be physically well-related to existing settlements, instead its reuse should be promoted in all parts of the countryside. The proposed restriction in DC33 that PDL be related to existing settlements is unjustified. Furthermore, DC33 does not provide any clarity on what ‘particular regard’ means in practice and whether ultimately this means applications will be refused if they are remote from a settlement, how remote or detached from a settlement is unacceptable?</p>	<p>Comments noted.</p> <p>The policy is to be amalgamated into Policy DM35 (Sustaining a Prosperous Rural Economy) which shall include allowance for the redevelopment of existing buildings for economic development in the countryside. It is important to limit the impact of development on the site and surrounding landscape, and although the NPPF’s definition of previously developed land includes the curtilage of land which is or was occupied by a permanent structure, the policy seeks to limit the extent of building in the site itself, unless justified, to reduce impact on the landscape.</p> <p>It is not proposed to include criterion i) in DM35 (Sustaining a Prosperous Rural Economy). It is not considered this test is necessary for proposals relating to proposals relating to economic development in the countryside, only for conversions to residential under DM24.</p> <p>It is recognised that the NPPF outlines that not all rural businesses and community projects will be in locations served by public transport. However, proposals for economic development proposals in the countryside will need to take account of LPR Policies SP3 and DM1, and active and sustainable methods of transport will be encouraged.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC34 Equestrian/racehorse industry

### (Proposed Submission LPR Policy: DM37 Equestrian and Horseracing Industry)

Number of responses received: 9

Respondent (with lpr ref)	Response	Council Response
<b>Statutory consultees</b>		
Greenham Parish Council (lpr935)	<p>There has been a significant increase in evening events at Newbury Racecourse that are not related to racing, at the same time as a very large increase in numbers of homes on adjacent land within the Racecourse's ownership. This could harm the amenity of residents who may have been unaware of the frequency and type non-racing activities.</p> <p>Development proposals in support of events not related to the racing industry and likely to occur mainly in evenings or at weekends, must demonstrate community support and sensitivity to noise and traffic impacts on the neighbourhood and highway network.</p>	<p>Comments noted</p> <p>Add the following text to end of the unnumbered para (after 12.43) in the Emerging Draft LPR relating to Newbury Racecourse - <u>The consideration of neighbour amenity will be an important issue when considering development proposals in support of events not related to the horseracing industry.</u></p>
Lambourn Neighbourhood Development Plan Steering Group (lpr1714)	<p>Title - Equestrian/racecourse industry (Should this be raceHORSE industry?)</p> <p>The inclusion of the "North Wessex Downs AONB Racehorse Industry" from Policy CS12 of the previous Local Plan is welcome.</p> <p>The racing industry is vital to the economic well-being of the parish of Lambourn and of West Berkshire, as illustrated in the SQW Report "Horse Racing in Lambourn Valley. The Industry's Economic and Social Impacts. January 2019". Upper Lambourn and Lambourn are at the core of the industry and we would wish to see it continue to be supported.</p> <p>There is a tendency to assume that almost any development associated with racing is a "good thing" and should be permitted. This is not always the case</p>	<p>Comments noted.</p> <p>Amend title as follows Equestrian <u>and</u> Horseracing <del>racecourse</del> Industry</p> <p>Clarify and amend the supporting text as follows:            'The Local Plan recognises the important links between the various aspects of the equestrian industry and the shared facilities and infrastructure that support it, such as <del>farriers,</del> <u>farriers,</u> <del>horse feed merchants,</del> <u>horse feed merchants,</u> veterinary practices, <u>institutions</u> <u>providing social and medical support, specialist retailers and equipment suppliers, farriers and horse transporters, horse</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>and the suitability and necessity tests in DC34 should be clarified to ensure such development really does bring benefit, not harm. The submission by Jockey Club Estates is broadly supported and in particular Section 4.9 of their Report.</p> <p>The businesses associated with the racing industry also need to be considered, as do the demands for suitable housing for racing staff. Evidence for this, more holistic view, seems to be lacking in the LPR and may limit the opportunities for the emerging LNDP to frame policies, based on detailed local knowledge, in general conformity with the emerging Local Plan.</p> <p>The emerging Local Plan should present well-informed policies, which can be applied consistently and which balance the needs of this important industry with the well-being of the community and the environment.</p>	<p><u>feed merchants, livery yards and riding schools which cater to both commercial and more recreational markets. Whilst this policy sets out the Council's approach specifically to equestrian development, proposals for related development such as those providers of goods and services to the industry will be considered in accordance with Policy DM35.....</u></p> <p><u>Land used for equestrian activities such as grazing land, stables, field shelters and other equine buildings, gallops and access routes, can all impact on both the visual and physical nature of the environment. It is particularly important that development proposals are in keeping with the character and appearance of the local area and prevent the spread of the built form in the countryside and AONB and this will be expected to be addressed through good quality design.....'</u></p> <p><b><u>'North Wessex Downs AONB Racehorse Industry....</u></b>  <b><u>Necessity test:</u></b> <u>Proposals for redevelopment or change of use will need to</u> <del>it is no longer necessary to retain the yard or facility in its current use.</del> <u>demonstrate the absence of harm to the horseracing industry through the loss of the existing facility. In order to show that there is no longer a demand for the yard or facility in that particular location a robust marketing plan, to the satisfaction of the Local Planning Authority, will be required as evidence from the applicant to show that all reasonable attempts have been made to sell or let the site at a realistic price. Any proposal for the loss of a training yard will need to demonstrate how it will not detrimentally alter the critical balance and/or range of yard sizes available in the area. It is important to retain a supply of yards which are of various sizes to allow for market churn.</u> <u>development proposals will be required to provide:</u></p> <ul style="list-style-type: none"> <li><u>A robust assessment which clearly demonstrates the absence of demand for the existing use and the absence</u></li> </ul>



Respondent (with lpr ref)	Response	Council Response
		<p><u>of demand for an alternative horseracing industry related use (which should be the first priority);</u></p> <ul style="list-style-type: none"> <li>• <u>An assessment of the existing contribution that the facility makes to the horseracing industry, or in the case of a vacant site, the last known contribution;</u></li> <li>• <u>In the case of a derelict/vacant site, an assessment of the reasons for dereliction including a history of the previous uses and the attempts made to reuse it for horseracing industry related uses; and</u></li> <li>• <u>a robust marketing plan, to the satisfaction of the Council, as evidence to show that all reasonable attempts have been made to sell or let the site at a realistic price. Its scope should be agreed with the Council in advance but it would be expected to cover a sufficient period, show that the site has been marketed at an appropriate value and has been advertised in publications that are accessible to the horseracing industry.</u></li> </ul> <p>Proposals for fragmentation of existing establishments and facilities should not adversely affect the operational use of the site or the industry as a whole. <u>It is important to retain a supply of yards which are of various sizes to allow for market churn, ensuring the facilitation of start-up businesses as well as established businesses. The loss of a facility should therefore not detrimentally alter the critical balance and/or range of yard sizes available in the area.</u></p> <p>..... It is the Council's preference for workers to be accommodated within existing nearby villages, so as to contribute to the overall sustainability of settlements and limit development in the countryside. <u>Whilst racing charities provide some subsidised and/or hostel accommodation in the area, it is recognised there is still a specific need for affordable single person accommodation in Lambourn..'</u></p>

Respondent (with lpr ref)	Response	Council Response
Lambourn Parish Council (lpr1446)	<p>The racehorse training industry and its associated businesses are of vital importance to the Parish of Lambourn and to the wider West Berkshire district.</p> <p>It was a Lambourn Councillor who spearheaded the writing of policies ECON8 and ECON9 in the 1990s, ensuring the racehorse industry was specifically included in the Local Plan. These policies were superseded by policy CS12 (not CS13, as stated in the LPR). It has, in the main, served its purpose and we do not wish to see it watered down. Policy DC34 appears to include more details, especially about general equestrian use. The section on the NWD AONB Racehorse Industry is copied word for word from CS12. We are pleased to see a reference in the supporting text (9.253) to the importance of the links between the various supporting businesses, and the recognition (9.255) that proposals for development be in keeping with the character and appearance of the local area and prevent the spread of the built form in the countryside and the AONB.</p>	<p>Comments noted.</p> <p>Amend 'Superseded West Berkshire Core Strategy 2006-2026 Policy' in Appendix 9 of the Emerging Draft LPR as follows –</p> <p>CS13<del>2</del> Equestrian/<del>racecourse</del><u>horse</u> industry</p>
Newbury Town Council (lpr2223)	<p>We support this policy, apart from concern about the possible impact of Racecourse events (noise) on neighbouring residential land. not in policy</p> <p><b>Reason:</b> There has been a significant increase in evening events at Newbury Racecourse that are not related to racing, at the same time as a very large increase in numbers of homes on adjacent land within the Racecourse's ownership. This could harm the amenity of residents who may have been unaware of the frequency and type non-racing activities there. We are also concerned about the more general disregard for the interests of their leaseholders and occupiers exhibited by the Racecourse and by the 'gagging clause' in their lease to property owners which seems to disenfranchise them with respect to this. Whilst this may not be entirely a planning matter, we believe it has an impact on how future proposals for development by the Racecourse should be regarded.</p> <p><b>Change Proposed:</b> Add to end of Supporting Text for Newbury Racecourse:</p> <p>"Development proposals in support of events not related to the racing industry and likely to occur mainly in evenings or at weekends must demonstrate community support and sensitivity to noise and traffic impacts on the neighbourhood and highway network."</p>	<p>Comments noted</p> <p>Add the following text to end of the Emerging Draft LPR unnumbered para(after 12.43) relating to Newbury Racecourse - <u>The consideration of neighbour amenity will be an important issue when considering development proposals in support of events not related to the horseracing industry.</u></p>

Respondent (with lpr ref)	Response	Council Response
Shaw cum Donnington Parish Council (lpr260)	We support the policy	Comments noted
<b>General consultation bodies</b>		
British Horse Society (lpr868)	<p>The Society applauds and supports inclusion of this policy because, as read, it applies to both the racing and non-racing horse industry. It might be noticed, and referenced, that nationally the horse industry is the second largest rural employer after the agriculture industry in the UK (British Horse Industry Confederation 2017) and, because of the rural nature of West Berkshire, it is unlikely that the position is different in West Berks</p> <p>Title: Presumably 'racehorse' not 'racecourse' is meant?</p> <p>Nationally this industry is referred to as the 'horse industry' to cover racing and non-racing activities. We suggest 'horse industry' is used in the LPR to be consistent with national policies.</p> <p>See <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69260/pb11323-en-horse-industry-strategy-051128.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69260/pb11323-en-horse-industry-strategy-051128.pdf</a></p> <p><a href="https://documents.hants.gov.uk/countryside/Equestrians-in-Hampshire.pdf">https://documents.hants.gov.uk/countryside/Equestrians-in-Hampshire.pdf</a></p> <p><a href="https://www.bvec.co.uk/downloads/external-information/mid-term-review-manifesto-for-the-horse-v7-jan-2017.pdf">https://www.bvec.co.uk/downloads/external-information/mid-term-review-manifesto-for-the-horse-v7-jan-2017.pdf</a></p> <p>We request that the wording of para 12.32 is modified or that the paragraph is removed. While we accept that there are some equestrian establishments where best practice might not be observed, there are others where it is and such establishments enhance the rural ambience. Furthermore, for example, there are agricultural premises and farm yards which are a blight on the landscape. To focus on equestrian establishments does not appear balanced to us.</p>	<p>Comments noted.</p> <p>Amend title as follows <u>Equestrian and Horseracing</u> <del>racecourse</del> Industry</p> <p>Clarify and amend the supporting text as follows:  'The Local Plan recognises the important links between the various aspects of the equestrian industry and the shared facilities and infrastructure that support it, such as <del>farriers, horse feed merchants,</del> <u>veterinary practices, institutions providing social and medical support, specialist retailers and equipment suppliers, farriers and horse transporters, horse feed merchants, livery yards and riding schools</u> which cater to both commercial and more recreational markets. <u>Whilst this policy sets out the Council's approach specifically to equestrian development, proposals for related development such as those providers of goods and services to the industry will be considered in accordance with Policy DM35.....</u></p> <p><u>Land used for equestrian activities such as grazing land, stables, field shelters and other equine buildings, gallops and access routes, can all impact on both the visual and physical nature of the environment.</u> It is particularly important that development proposals are in keeping with the character and appearance of the local area and prevent the spread of the built form in the countryside and AONB <u>and this will be expected to be addressed through good quality design.....'</u></p>

Respondent (with lpr ref)	Response	Council Response
Pegasus for Jockey Club Estates (lpr1907)	<p>JCE has reviewed the Regulation 18 draft of the Local Plan and submits these representations to assist in the drafting of appropriate policies to protect and enhance the success of the horse-racing industry centred at Lambourn – within an area known as the Valley of the Racehorse. These representations seek to ensure that the industry can thrive and continue to make a substantial contribution to the economic and cultural well-being of the area. A thriving racing industry ensures that this important part of the fabric of Lambourn and the wider area is protected, and the high-quality characteristics of the area can be maintained and enhanced. Achieving these goals has wider knock-on benefits for those not involved in horse-racing that may be involved in many industries that count horse-racing as part of their client/customer base.</p> <p>JCE is keen to assist the Council in preparing the new Local Plan so that the objectives and goals of the HRI can be aligned and complementary to the objectives and goals of the Council. JCE is able to draw upon extensive experience and knowledge regarding the HRI that it feels would be beneficial for the Council when it is preparing and implementing the new Local Plan. JCE extends an invitation to the Council to collaborate and it is on this basis that the representations are made.</p> <p>JCE considers that the plan (including the associated evidence base) should accommodate the following matters:</p> <ol style="list-style-type: none"> <li>1. Acknowledgment and consideration of the importance of the HRI when assessing the options for the strategic distribution of growth – the baseline information signalled as being prepared in this regard must be incorporated in further SA work;</li> <li>2. The need to ensure that distribution options avoid or minimise impacts on the HRI since the HRI is not susceptible itself to seeking alternative locations or options (other than on a very local scale).</li> <li>3. The need for appropriate policies to protect the industry both from itself and from other development that may impact upon</li> </ol> <p>JCE notes and welcomes the reference at paragraph 4.15 to Lambourn being the heart of one of the most important areas for horseracing in the country. It also welcomes the reference at paragraph 11.41 to the importance of the industry to the local rural economy. However, JCE considers that this underplays the contribution that the industry currently</p>	<p>Comments noted and the general support of the Jockey Club Estates is welcomed.</p> <p>Specific comments in relation to the Sustainability Appraisal are dealt with as part of the Council's response to comments on that document.</p> <p>Comments in relation to the Site Selection Background Paper will be incorporated as appropriate into that document, an updated version of which will be published with the Proposed Submission LPR.</p> <p>Amend the LP Context text as follows: 'The importance of agriculture, <u>the horseracing industry</u> and <u>other rural businesses</u>,.....are all important issues and challenges to be considered through the review of the Local Plan....'</p> <p>Amend the supporting text of the policy as follows: '<u>The North Wessex Downs AONB is home to around 10% of Britain's racehorse trainers and the Lambourn area is a nationally important centre of activity for the horseracing industry second only to Newmarket. The horseracing industry is one of the strongest rural industries in the district, employing over 700 people and contributing £22 million each year to the economy. Substantial investments in recent years, including the upgrading of the public gallops by the Jockey Club Estates and other training yards, has also enhanced Lambourn's status within the industry. The industry has long been a fundamental part of the character of Lambourn and the surrounding villages with the Lambourn Valley sometimes referred to as 'The Valley of the Racehorse'. The traditional gallops landscape and views of racehorses training are valued features of the character of the area.</u>'</p>

Respondent (with lpr ref)	Response	Council Response
	<p>makes to the wider economy given the national importance of horseracing to the economy and the complementary role that various horseracing locations around the country have in this regard. Lambourn is an area of growing importance to the industry and is one that JCE is very keen to protect. JCE considers that it is important that the evidence for the Local Plan includes documents that clarify the economic significance to the area so that the impacts of development proposed through the Local Plan can be fully understood and evaluated.</p> <p>The importance of the industry stretches beyond economic considerations. It also contributes to the characteristics of the area and assists in making the area an extremely beautiful place to live, work and visit. JCE considers that the next stages of the Plan will need to ensure that this is adequately explained and evidenced with appropriately worded policies to deliver the protection and support for growth that appears to be within the Regulation 18 documents. To assist in this regard, JCE has provided comments on the consultation documents.</p> <p>We consider first the evidence base documents before moving on to the Local Plan - see lpr1908.</p> <p>JCE considers that the Local Plan can and should be strengthened in the approach that it takes to the HRI. Strong and effective policies provide protection for existing businesses involved in the industry and provide confidence to new investors. Both are equally important, and both assist in supporting the economic success of the area. This economic success gives rise to positive social benefits for the community as well as ongoing contributions to the landscape character of the area.</p> <p>JCE wishes to make it clear that policy CS12 (Appendix 9 of the draft Local Plan mistakenly refers to CS13 being replaced by DC34) of the Core Strategy has proven to be very effective at protecting the industry and is pleased to see that emerging policy DC34 takes forward many aspects of this policy. The comments it now wishes to make are about strengthening that position as the industry continues to grow and as we approach a period of economic uncertainty as we get ever closer to emerging from the current pandemic.</p> <p>The Plan should identify and acknowledge the extent of the HRI in the District. This goes beyond the acknowledgment of the contribution that the</p>	<p>The contribution that the industry makes to the character of the area is also set out in more detail in the West Berkshire Landscape Character Assessment (2019). It is agreed the Landscape Character Appraisal prepared to inform the Lambourn Neighbourhood Development Plan will also be a particularly useful source of information in the consideration of planning applications.</p> <p>Amend Emerging Draft LPR Appendix 9 to refer to the correct policy as follows: ‘CS132’</p> <p>Clarify and amend the supporting text of the policy as follows:  ‘The Local Plan recognises the important links between the various aspects of the equestrian industry and the shared facilities and infrastructure that support it, such as <del>farriers, horse feed merchants,</del> <u>farriers, providing social and medical support, specialist retailers and equipment suppliers, farriers and horse transporters, horse feed merchants,</u> livery yards and riding schools which cater to both commercial and more recreational markets. <u>Whilst this policy sets out the Council’s approach specifically to equestrian development, proposals for related development such as those providers of goods and services to the industry will be considered in accordance with Policy DM35.....</u></p> <p>The LPR has to cover a wide variety of significant issues and it would not be appropriate to devote a whole chapter to the horseracing industry. More detailed policies are more appropriately considered as part of the Lambourn Neighbourhood Plan. Once this has been made, if further detail is then considered necessary to support the</p>

Respondent (with lpr ref)	Response	Council Response
	<p>industry makes to the North Wessex Downs AONB. Although the importance of the industry is identified, JCE considers that it is relevant to explain where the industry is located and acknowledge the differences between the cluster centred on Lambourn and the uses that extend beyond this area. The Plan should also acknowledge the role that the industry plays in contributing to the character of the area, including the AONB. JCE suggests that the industry should be identified as being brownfield or greenfield in characteristics to assist in the consideration of future development proposals.</p> <p>As you are aware, Lambourn Parish Council is in the process of preparing a Neighbourhood Plan in consultation with local residents. This has involved the preparation of a number of background documents that will no doubt be of assistance to the Council in its preparation of the Local Plan. JCE urges the Council to liaise with Lambourn Neighbourhood Plan Steering Group to explore the benefit of doing this. JCE suggests that the Council would find particular merit in having regard to the Landscape Character Assessment that has been prepared for Lambourn and suggests that this should be used to help inform the commentary on the Local Plan regarding the characteristics of the HRI.</p> <p>JCE suggests that the Plan include a separate chapter on this topic to both signify the importance the Plan gives this industry and assist the reader in identifying the relevant considerations. That chapter should include the policies that relate to the HRI as well as a plan to identify the areas where the HRI is located and the differences between the areas.</p> <p>JCE considers that it is important that the policies also consider two important aspects: protecting the industry from itself and protecting the industry from impacts arising from non-HRI uses. We take these points in turn below.</p> <p><u>Protecting the industry from itself</u> - The Council has successfully resisted applications that have sought to diminish the value of a particular site to the HRI in pursuit of other economic gains (to the site owner). JCE has no desire to inhibit the economic betterment of individuals but it is concerned when it sees individual establishments redeveloped/lost. Such an action causes irreparable damage to the variety of sites within the industry that collectively cause significant harm to the value of the area for horseracing. It fully</p>	<p>development plan policies then the Council would welcome the support of the JCE in its preparation.</p> <p>Amend the supporting text as follows:  '<b>Necessity test:</b> <del>Proposals for redevelopment or change of use will need to it is no longer necessary to retain the yard or facility in its current use.</del> <u>demonstrate the absence of harm to the horseracing industry through the loss of the existing facility. In order to show that there is no longer a demand for the yard or facility in that particular location a robust marketing plan, to the satisfaction of the Local Planning Authority, will be required as evidence from the applicant to show that all reasonable attempts have been made to sell or let the site at a realistic price. Any proposal for the loss of a training yard will need to demonstrate how it will not detrimentally alter the critical balance and/or range of yard sizes available in the area. It is important to retain a supply of yards which are of various sizes to allow for market churn.</u> development proposals will be required to provide:</p> <ul style="list-style-type: none"> <li>• <u>A robust assessment which clearly demonstrates the absence of demand for the existing use and the absence of demand for an alternative horseracing industry related use (which should be the first priority);</u></li> <li>• <u>An assessment of the existing contribution that the facility makes to the horseracing industry, or in the case of a vacant site, the last known contribution;</u></li> <li>• <u>In the case of a derelict/vacant site, an assessment of the reasons for dereliction including a history of the previous uses and the attempts made to reuse it for horseracing industry related uses; and</u></li> <li>• <u>a robust marketing plan, to the satisfaction of the Council, as evidence to show that all reasonable attempts have been made to sell or let the site at a realistic price. Its scope should be agreed with the Council in advance but it would be expected to cover a</u></li> </ul>

Respondent (with lpr ref)	Response	Council Response
	<p>supports policies that intend to resist this. It suggests that the supporting text of policy DC34 can be strengthened to explain this as being the intention of the policy and providing further guidance to the reader on how the policy will be applied.</p> <p>JCE suggests that the following should be added as being required for any application where policy DC34 relates:</p> <ol style="list-style-type: none"> <li>1. The completion of an appropriate marketing exercise to demonstrate the absence of demand for the existing use and the absence of demand for an alternative HRI use (which should be the first priority). The scope of the exercise should be agreed with the Council before It must cover a sufficient period, market the site at an appropriate value and be advertised in publications that are accessible to the HRI.</li> <li>2. An assessment of the existing contribution of the facility to the HRI (or in the case of a vacant site, the last known contribution).</li> <li>3. In the case of a derelict/vacant site, an assessment of the reasons for dereliction including a history of the previous uses and the attempts made to reuse it for HRI-related</li> <li>4. Evidence to demonstrate the absence of harm to the HRI through the loss of the existing facility – recognising the need to preserve a variety of sites that facilitate start-up businesses in the HRI as well as established businesses.</li> <li>5. The cumulative losses prior to the application and before the decision is made should be taken into account when undertaking this</li> </ol> <p>JCE considers that such an approach is justified to ensure that the strength of the equine cluster can be preserved so that it continues to be a major contributor to the economy and contribute to the landscape character of the District.</p> <p>JCE is keen to avoid the experiences in other horseracing centres where development pressures have caused the decline of the industry in that location. Epsom provides an appropriate cautionary tale to be aware of. In 1970, Epsom had 520 horses in training and by 2019 this had fallen to 139. Epsom has now reached the level where it is financially unsustainable and is currently being supported financially by The Jockey Club. The decline at</p>	<p><u>sufficient period, show that the site has been marketed at an appropriate value and has been advertised in publications that are accessible to the horseracing industry.</u></p> <p>Proposals for fragmentation of existing establishments and facilities should not adversely affect the operational use of the site or the industry as a whole. <u>It is important to retain a supply of yards which are of various sizes to allow for market churn, ensuring the facilitation of start-up businesses as well as established businesses. The loss of a facility should therefore not detrimentally alter the critical balance and/or range of yard sizes available in the area.</u></p> <p>The concerns of the JCE are noted in relation to the protection of the industry from other development but it is important to note that the policies in the LPR need to be read as a whole. The impact of potential future development on the HRI at both a strategic level and individual application stage would therefore be taken into account as appropriate.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Epsom has taken place despite the growth of the industry as a whole and is the result of a combination of increased urbanisation in the area and an absence of adequate planning policy to protect the industry. JCE is confident that WBC will not let that happen in Lambourn and is keen to work with the Council to ensure that the appropriate policy framework is in place to secure this.</p> <p><u>Protecting the industry from other development</u> - JCE considers that it is equally important to ensure that there is a separate policy that deals explicitly with the assessment of impacts on the HRI arising from non-HRI uses. This is not just on sites that are currently or were last in HRI use, which are already covered in suggested policy DC34. This is also for those sites that are not in HRI use but, because of the location of the site, may have an impact on the HRI. This is especially significant when considering the distribution of new development through the Plan as well as the consideration of applications that subsequently come forward on such sites. The HRI can be sensitive to developments that interrupt or delay the movement of the industry around the area as well as uses that increase noise and disruption near existing uses. Other environmental impacts that should be considered are air quality, ecology and arboriculture. All of these are relevant considerations in any development control function but JCE considers that it is important to signpost developers to the need to give specific consideration of these factors on the HRI. Fundamentally, all developments within a defined area (to be identified in the Plan) should consider the economic, environmental and social impacts (both positive and negative) on the HRI.</p> <p>JCE considers that it is important that the policies of the new Local Plan are consistently applied and recognises the complicated and unusual nature of the HRI. It therefore suggests that the Council prepare a Supplementary Planning Document to guide the implementation of its policies and JCE offers full support and assistance in drafting this document</p> <p><u>Measures sought</u> -</p> <p>To address the points raised above, JCE considers that the Local Plan should be amended as follows:</p> <ol style="list-style-type: none"> <li>1. Include reference to the importance of preserving and enhancing the HRI in the vision and strategic objectives identified in section 3</li> </ol>	



Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>2. Update the evidence base to include HRI baseline assessment documents and refer to these as being 'key pieces of evidence' in section 4 of the Plan.</li> <li>3. Update Figure 1 (West Berkshire Constraints) to include information relating to the location of the HRI and refer to this in the supporting text</li> <li>4. Amend policy SP1 (spatial strategy) to explicitly refer to the objective of preserving and enhancing the HRI</li> <li>5. Review to the importance of preserving the landscape character associated with the HRI in policy SP8 and update the supporting text to explain this character</li> <li>6. Create a separate chapter to deal with the HRI</li> <li>7. Incorporate a new policy to deal with the assessment of impacts of non- HRI development on the HRI</li> <li>8. Prepare Supplementary Planning Document to help guide the application of the HRI policies of the Plan</li> </ol>	
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr664)	<p>We support this policy, apart from concern about the impact of non-racing Racecourse events (noise) on neighbouring residential land not in policy. Significant increase in evening events not related to racing is occurring, which cause harm to the amenity of residents.</p> <p>Add to end of Supporting Text for Newbury Racecourse:  “Development proposals in support of events not related to the racing industry and likely to occur mainly in evenings or at weekends must demonstrate community support and sensitivity to noise and traffic impacts on the neighbourhood and highway network.”</p>	<p>Comments noted</p> <p>Add the following text to end of the Emerging Draft LPR unnumbered para (after 12.43) relating to Newbury Racecourse - <u>The consideration of neighbour amenity will be an important issue when considering development proposals in support of events not related to the horseracing industry.</u></p>
<b>Landowners, site promoters and developers</b>		
Fowler Architecture and Planning (lpr1810)	<p>The section on the North Wessex Downs AONB Racehorse Industry should be broadened to reflect the need for the industry to modernise their stable complexes and facilities so that they remain fit-for-purpose. Explicit recognition is therefore needed in policy to support the retention, expansion and modernisation of existing establishments in order to maintain their</p>	<p>Comments noted.</p> <p>Amend the supporting text as follows:  <u>'The horseracing industry is one of the strongest rural industries in the district, employing over 700 people and contributing £22 million each year to the economy.</u></p>

Respondent (with lpr ref)	Response	Council Response
	function and value to the rural economy and hub of horseracing on the Downs.	<u>Substantial investments in recent years, including the upgrading of the public gallops by the Jockey Club Estates and other training yards, has also enhanced Lambourn's status within the industry.'</u>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC35 Transport Infrastructure

### (Proposed Submission LPR Policy: DM42 Transport Infrastructure)

Number of responses received: 16

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr937)	<p>GPC would like to see an aim to reduce need to travel by car.</p> <p>In 12.48 of Supporting Text, in last sentence replace “re-use the alignment” with “replace that part”; also delete all after “railway line to provide” and replace with: “...,between Hermitage and Newbury, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as necessary.</p> <p>In Supporting Text – preferably at the end of first para (12.44) or immediately after it, there needs to be a statement such as:- “At all stages in planning for a major development, proposals should consider ways of reducing the need to travel, especially during the working day. Where possible, all facilities needed on a daily basis should be located within a 15-minute journey time of a new place of employment or residence by means of active travel means. If necessary, facilities should be provided on site.</p>	<p>Comments noted</p> <p>A link from Newbury to connect with the Hermitage to Hampstead Norreys former railway cycle path is recognised as an important leisure cycling corridor (as well as being having potential for future commuter use). The Council would be supportive of initiatives to develop and deliver a link from Newbury with the Hermitage to Hampstead Norreys active travel route.</p> <p>Amend paragraph in the supporting text as follows –  ‘....Specifically this could include opportunities to <u>replace that part</u> <del>reuse the alignment</del> of the former Didcot, Newbury &amp; Southampton railway line to provide <del>a leisure walking and cycling route between Hermitage and Hampstead Norreys</del> <u>between Hermitage and Newbury, a route for both leisure and potentially commuter use,</u></p>

Respondent (with lpr ref)	Response	Council Response
		<p><u>incorporating existing minor roads and bridle ways as a walking, cycling and equestrian route. Opportunities at other locations, including use of the Kennet and Avon canal towpath, (although opportunities at other locations will be sought where applicable).</u></p> <p>Add the following text to the end of the first paragraph of the supporting text as follows -  <u>'...At all stages, proposals should consider the need of reducing the need to travel, especially during the working day. Where possible, services and facilities should be located within an acceptable walking and cycling distances of new places of employment or residences.'</u></p>
Hermitage Parish Council (lpr1814)	<p>HPC agrees with the policy that 'new development will only be permitted where the relevant transport infrastructure is delivered in a timely manner and that new developments would be expected to make a proportionate contribution to the provision or improvement of a range of transport infrastructure'.</p> <p>However, the PC would like to make the following statement as it believes that a further increase of 20 dwellings in the village would be unfair due to the considerable developments that have taken place in Hermitage. In the last 15 or so years the number of dwellings has increased by 36% to 786 or 42 % if all those currently in the planning process are included. It is understood that this community has absorbed one of the greatest increases in homes in the area, second only to Cold Ash. Perception by the community is that Hermitage will cease to be a village.</p> <p>As well as Forest Edge and Hermitage Green being fairly substantial developments, there are a number of smaller developments that are currently going through the planning process: Cala Homes development behind Charlotte Close, the Old Farmhouse off the main street as well as the new CoOp and houses on the old garage site. This has subsequently led to an increase in the amount of traffic on the B4009.</p> <p>The potential for a number of houses in Compton will inevitably have an effect on the traffic going through Hermitage towards Newbury in the future too, as will any future developments that are agreed.</p>	<p>Comments noted</p> <p>Comments around which sites should be allocated will be picked up in other parts of the Local Plan Review. Transport modelling has taken place which incorporates the combined impact of proposed new development through the plan period. Detailed transport work for each development (where applicable) will come forward at the planning application stage.</p>

Respondent (with lpr ref)	Response	Council Response																																													
	<p><b>Road Safety Concerns:</b>  <b>Speed:</b>            At the moment the PC in conjunction with WB Traffic and Road Safety Team (Cheryl Evans) are monitoring the speed of the traffic due to concerns that the road is becoming a rat run and that drivers are not adhering to the speed limit, despite there being a primary school towards the north end of the road. Our current findings can be seen in the table below (data acquired between June 2020 and January 2021).</p> <p>KR ProGen5 treatment summary: B4009, Hermitage</p> <table border="1" data-bbox="436 719 1323 1031"> <thead> <tr> <th>Treatm ent</th> <th>Av. mph</th> <th>Max mph</th> <th>85<sup>th</sup> m ph</th> <th>% Above ACPO</th> <th>IN mph</th> <th>OUT mph</th> <th>Reduct ion mph</th> <th>Reduct ion %</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>31</td> <td>59</td> <td>39</td> <td>31.7</td> <td>31</td> <td>27</td> <td>-4</td> <td>-13</td> </tr> <tr> <td>2</td> <td>31</td> <td>75</td> <td>37</td> <td>28.8</td> <td>31</td> <td>28</td> <td>-3</td> <td>-10</td> </tr> <tr> <td><b>3 (Ghost)</b></td> <td><b>32</b></td> <td><b>65</b></td> <td><b>39</b></td> <td><b>32.4</b></td> <td><b>32</b></td> <td><b>30</b></td> <td><b>-2</b></td> <td><b>-6</b></td> </tr> <tr> <td>3</td> <td>31</td> <td>60</td> <td>37</td> <td>28</td> <td>31</td> <td>29</td> <td>-2</td> <td>-6</td> </tr> </tbody> </table> <p>As you can see from the data between 28% and 32% of the traffic on this road (Northbound) are over the ACPO –(10% + 2mph =35mph). With the highest speed recorded at 75mph. A quite shocking statistic.</p> <p>Previous Community Speed Watch deployment data prior to the pandemic showed:            Total cars caught between 30 and 50mph – 39 cars in 1 hour            -35 cars captured between 31 and 40 (this is likely to be 35-40mph)            -4 cars captured between 41 and 50mph</p>	Treatm ent	Av. mph	Max mph	85 <sup>th</sup> m ph	% Above ACPO	IN mph	OUT mph	Reduct ion mph	Reduct ion %	1	31	59	39	31.7	31	27	-4	-13	2	31	75	37	28.8	31	28	-3	-10	<b>3 (Ghost)</b>	<b>32</b>	<b>65</b>	<b>39</b>	<b>32.4</b>	<b>32</b>	<b>30</b>	<b>-2</b>	<b>-6</b>	3	31	60	37	28	31	29	-2	-6	<p>The current issues relating to speeding is an operational issue that is currently being dealt with by WBC’s Traffic and Road Safety Team.</p>
Treatm ent	Av. mph	Max mph	85 <sup>th</sup> m ph	% Above ACPO	IN mph	OUT mph	Reduct ion mph	Reduct ion %																																							
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Respondent (with lpr ref)	Response	Council Response
	<p><b>Demographic</b> Hermitage Parish – 9 cars -mainly from Forest Edge and B4009 Compton and Hampstead Norreys 9 cars Total for Local areas including: Shaw, Newbury, Downland Villages, Cold Ash and Upper Bucklebury -29 cars Total for Outside areas including: Reading, Bracknell, Swindon, Hungerford, Marlborough 10 cars. These vehicles were sent letters from TVP. The Parish Council, having now collected sufficient data to enable further deployment of Community Speed Watch (but has been thwarted by the Covid Pandemic) Is concerned that further development within the area will only exacerbate the situation without due consideration to the capacity of an already busy and quite dangerous B -road.</p> <p>The Parish Council requests that proactive consideration for traffic calming measures on the B4009 is at the forefront of the LPR. Southbound data will be collected as soon as the pandemic allows for normal life to be resumed as well as data from the Yattendon road – residents have complained to the PC that they feel that the speed along this road is also excessive.</p> <p><b>Road visibility:</b> Further concern is directed at the mini-roundabout at the Priors Court Road junction – the visibility when entering and exiting the roundabout is difficult and the roundabout is near capacity – further developments within Hermitage would need this roundabout to be modified/ improved.</p> <p><b>Green Strategy:</b> WB in its strategy is committed to improving green transport and reducing its carbon footprint (WB Environment strategy July2020 and the Local Transport Plan)– the very successful Eling way that connects Hampstead Norreys and Hermitage has gone some way of improving the B4009 for cyclists and pedestrians alike. However, the Parish Council feels that for it truly to be committed to its Green Policy, the Active Travel Route <b>must</b> be continued south to link Hermitage and Newbury and a suitable route found –</p>	<p>Requests for Community Speed Watch and specific traffic management measures, such as traffic calming, are not covered in the Local Plan Review. These can be raised with the Council via the current highways network management processes.</p> <p>Local highway, traffic management and safety issues would be considered as part of the Development Management process should further applications come forward. Any such required improvement identified through this process would need to be in accordance with this policy.</p> <p>A link from Newbury to connect with the Hermitage to Hampstead Norreys former railway cycle path is recognised both as an important leisure and potential commuter cycling route, including being shown in the Council’s Local Walking &amp; Cycling Infrastructure. WBC would be supportive of initiatives to develop and deliver a link from Newbury to the new Eling Way active travel path.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Bullet point 7 DC 35. This would be a great step forward in both reducing the traffic on the B4009 and reducing emissions as well as providing a safe route for cyclists and would ensure that bullet points1 and 2 DC35 are met.</p> <p><b>Transport:</b> Public transport -bus services have been reduced over the years, HPC would like to see improvements to this provision.</p> <p><b>Summary:</b> Hermitage Parish Council is concerned that following the developments of the above housing estates (FE and HG) there has been little improvement in the infrastructure -such as traffic calming, speed cameras etc in the village since the building of these sites and is also concerned that if further development is to be allowed the same will be true. The PC urges the WB Council to fully review the traffic situation through Hermitage. It asks WBC to ensure that Bullet point 6-‘improvements to the safety and operational capacity of the local road network’ is met and to prohibit further development in an AONB.</p>	<p>Where contributions from new development can be sought towards passenger transport services these opportunities are taken. However, this is normally only effective connected with large developments. Other ways of supporting travel choice in areas outside of the main urban areas of West Berkshire will be explored through the Bus Service Improvement Plan and review of the Local Transport Plan. Traditional bus services are not sustainable with small passenger numbers.</p>
<p>Newbury Town Council (lpr2222)</p>	<ol style="list-style-type: none"> <li>1. Minor change regarding re-use of former railway lines</li> <li>2. Aim to reduce need to travel by car</li> </ol> <p>Reason: The Hermitage to Hamstead Norreys cycle path has recently been completed. The current focus is the link between Hermitage and Newbury, which will require considerably most funding but also potentially have much greater</p> <p>The ideal transport policy would not rely on private car ownership at all. The concept of a “15-minute neighbourhood” applied to a sustainable modern settlement in a Climate Emergency would require all daily needs to be met without a car.</p> <p>Change Proposed: In 12.48 of Supporting Text, in last sentence replace “re-use the alignment” with “replace that part”; also delete all after “railway line to provide” and replace with: “... between Hermitage and Newbury, a route</p>	<p>Comments noted.</p> <p>A link from Newbury to connect with the Hermitage to Hampstead Norreys former railway cycle path is recognised both as an important leisure and potential commuter cycling route, including being shown in the Council’s Local Walking &amp; Cycling Infrastructure. WBC would be supportive of initiatives to develop and deliver a link from Newbury to the new active travel path.</p> <p>Add the following text to the end of the first paragraph of the supporting text as follows -  <u>‘...At all stages, proposals should consider the need of reducing the need to travel, especially during the working day. Where possible, services and facilities should be located within an acceptable walking and cycling distances of new places of employment or residences.’</u></p>

Respondent (with lpr ref)	Response	Council Response
	<p>for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as ”</p> <p>Somewhere in Supporting Text – preferably at the end of first para (12.44) or immediately after it, there needs to be a statement such as: “At all stages in planning for a major development, proposals should consider ways of reducing the need to travel, especially during the working day. Where possible, all facilities needed on a daily basis should be located within a 15-minute journey time of a new place of employment or residence by means other than the private car. If necessary, facilities should be provided on site.”</p>	
Shaw-cum-Donnington Parish Council (lpr261)	We support the policy.	Comments noted
Stratfield Mortimer Parish Council (lpr442)	<p>While the policy is sensible, it does not deliver the requirements in SP 5 or SP 22. It is accepted that this is difficult to achieve but there are no radical policies that attempt to ‘shift the dial’ on, for instance, climate change. The vague reference to “expect to make a proportional contribution” is a very weak wording and the only real climate change element is the “provision of electric vehicle charging points and associated infrastructure”. Once again this is very vague.</p> <p>Changes: A more robust and radical approach that will deliver on the Strategic Policies.</p>	<p>Comments noted.</p> <p>Amend the first paragraph of the policy to strengthen the link between the policy and how it can contribute to addressing the climate emergency, as follows - ‘Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. <u>In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably. Developments must be supported through a range of infrastructure associated with different transport modes...</u>’</p> <p>The provision of electric vehicle charging points and infrastructure is currently actively sought in the development management process and will remain the case in the Local Plan Review. The Council is also currently developing its own guidance to outline the requirements that developers will be expected to provide.</p>



Respondent (with lpr ref)	Response	Council Response
		The UK Government has recently announced that new homes and buildings, including those undergoing renovations, are now required to install electric vehicle charging points as part of English Building Regulations.
Defence Infrastructure Organisation (lpr2072)	Many MOD establishments have specific operational access requirements, in particular logistics. The dimensions and weights of some of the vehicles used by the MOD can be beyond that normally used by public/commercial vehicles. When designing schemes which affect key access routes to MOD establishments it is therefore recommended that the access requirements are taken into account and the MOD is consulted	Comments noted
<b>General consultation bodies</b>		
AWE (lpr521)	Changes: There should be reference to transport infrastructure accommodating electric scooters in the event their use on the external highway network becomes legal. Similarly, electric scooters should be referenced in paragraph 12.46 in the event their use on the external highway network becomes legal.	Comments noted.  The Council is aware of the issues surrounding electric scooters and that they may potentially, in time, become legal on the local highway network.  The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review. It is highly likely that this will consider policies surrounding the role that new technologies will have on the District over future years. This will include the need to respond to and cater for new and emerging micro-mobility technologies, such as e-scooters.
British Horse Society (lpr 876)	The wording in this section does not support the horse industry policy (DC34) because, although this section includes recreational travel, there is no mention of equestrian travel. It is vital to include equestrian travel to support the horse industry.  Changes: To the policy:	Comments noted.  Amend the policy and supporting text to include references to equestrian travel where appropriate:  1 <sup>st</sup> , 2 <sup>nd</sup> and 8 <sup>th</sup> bullet points of the policy as follows

Respondent (with lpr ref)	Response	Council Response
	<p><i>'Connections and improvements to local pedestrian, cycle and <b>equestrian</b> networks, including access to public transport routes.'</i>  <i>'Walking, cycling <b>and equestrian</b> infrastructure identified in relevant Local Cycling and Walking Infrastructure Plans.'</i>  <i>'Works to allow the re-use of former railway line alignments as walking, cycle and <b>equestrian</b> routes.'</i></p> <p>To the supporting text (changes in bold)  <b>12.46</b> <i>The Council actively seeks to further develop walking, cycling <b>and equestrian</b> networks in the District to encourage more travel by sustainable modes. As part of this, Local Cycling and Walking Infrastructure Plans (LCWIPs) identify specific walking, cycling and equestrian improvements on key corridors. <b>Cycling and walking improvements</b> are largely centred on the urban areas with one covering Newbury and Thatcham urban area and the other including the Eastern Urban Area. For the latter plan the Council has partnered with Reading and Wokingham Borough Councils in the development of a LCWIP for the wider Reading urban area. The LCWIPs will be used to inform the Council's own future investment strategies and CIL funding bids as well as to guide the delivery of the most appropriate walking, cycling <b>and equestrian</b> infrastructure to support new development.</i></p> <p><b>12.48</b> <i>Whilst it is anticipated that the majority of development will be focused in existing urban areas and within settlement boundaries, it is important that improvements are also sought to encourage sustainable leisure and recreational opportunities in the rural areas of the District. Specifically this could include opportunities to re-use the alignment of the former Didcot, Newbury &amp; Southampton railway line to provide a leisure walking, cycling <b>and equestrian</b> route between Hermitage and Hampstead Norreys (although opportunities at other locations will be sought where applicable).</i></p>	<ul style="list-style-type: none"> <li>• Connections and improvements to local pedestrian, <del>and</del> cycle <u>and equestrian</u> networks, including access to public transport routes.</li> <li>• Walking, <del>and</del> cycling <u>and equestrian</u> infrastructure identified in relevant Local Cycling and Walking Infrastructure Plans</li> <li>• Works to allow the re-use of former railway line alignments as walking, <u>cycling and equestrian</u> <del>and cycle</del> routes.</li> </ul> <p>Amend the supporting text as follows –  'The Council actively seeks to further develop walking, cycling <u>and equestrian</u> networks in the District to encourage more travel by sustainable modes.....The LCWIPs will be used to inform the Council's own future investment strategies and CIL funding bids as well as to guide the delivery of the most appropriate walking, cycling <u>and equestrian</u> infrastructure to support new development.</p>
Canal and River Trust (lpr 910)	Changes: Please add works to improve the Kennet & Avon towpath as a walking and cycling route.	Comments noted.  The Kennet & Avon Canal is, and will continue to remain an important walking and cycling route in West Berkshire (recognised in the Council's Local Walking & Cycling Infrastructure Plan).

Respondent (with lpr ref)	Response	Council Response
		<p>Amend paragraph in the supporting text as follows –  ‘...Specifically this could include opportunities to <u>replace that part reuse the alignment</u> of the former Didcot, Newbury &amp; Southampton railway line to provide a <u>leisure walking and cycling route between Hermitage and Hampstead Norreys between Hermitage and Newbury, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as a walking, cycling and equestrian route. Opportunities at other locations, including use of the Kennet and Avon canal towpath, (although opportunities at other locations will be sought where applicable).</u>’</p>
<p>Mid and West Berkshire Local Access Forum (lpr1891)</p>	<p>MWBLAF welcomes the inclusion in this policy of “Works to allow the re-use of former railway line alignments as walking and cycle routes” and the specific mention in paragraph 12.48 of the leisure walking and cycling route between Hermitage and Hampstead Norreys. This route has been completed, and is therefore not a future opportunity as suggested in this paragraph. The value of this route will be greatly enhanced if it can be extended to Newbury to Compton, and it could then become used for commuting as well as leisure. Note that this route is for equestrian use as well as walking and cycling.</p> <p>The Forum supports the British Horse Society’s view that reference to equestrians must be included in this section – please see the Society’s response for specific proposals.</p> <p>Changes:  The Forum recommends that paragraph 12.48 is amended to reflect the current status of the Hermitage to Hampstead Norreys leisure route, and the aspiration to extend it:  12.48 Whilst it is anticipated that the majority of development will be focused in existing urban areas and within settlement boundaries, it is important that improvements are also sought to encourage sustainable leisure and recreational opportunities in the rural areas of the District. Specifically this could include opportunities to re-use the alignment of the former Didcot,</p>	<p>A link from Newbury to connect with the Hermitage to Hamstead Norreys former railway cycle path is recognised as an important leisure cycling corridor (as well as being having potential for future commuter use). WBC would be supportive of initiatives to develop and deliver a link from Newbury with the Hermitage to Hampstead Norreys active travel route as would opportunities to extend the route northwards to Compton.</p> <p>Please see response to lpr876</p> <p>The amendment to the supporting paragraph specifically looks to provide a link to replace the former railway alignment between Hermitage and Newbury.</p> <p>Although the potential to extend the Hermitage and Hampstead Norreys route north to Compton has not been included in revised supporting text, opportunities to develop this would be supported.</p>

Respondent (with lpr ref)	Response	Council Response
	Newbury & Southampton railway line to <del>provide a</del> <b>extend the new</b> leisure walking <del>and</del> -cycling <b>and equestrian</b> route between Hermitage and Hampstead Norreys <b>to Newbury and Compton</b> (although opportunities at other locations will be sought where applicable).	
Home Builders Federation (lpr1954)	<p>This policy introduces requirements for electric vehicle charging points and any associated infrastructure to be provided on all development. The HBF supports the use of electric and hybrid vehicles and the introduction of the necessary supporting infrastructure via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. It is the industry's preference for a national approach to the provision of charging points rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.</p> <p>The Government has recognised in recent consultations the possible impact of any requirement to provide electric vehicle charging points on housing supply, where the requirements are not technically feasible. The same consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of Electric Vehicle Charging Points (EVCP) in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment.</p> <p>Where such costs are high the Government are proposing that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In instances where the additional costs are likely to make developments unviable, it is the Government's view that the EVCP</p>	<p>Comments noted.</p> <p>The Council is supportive of a standardised approach recently introduced through English Building Regulations Approved Document S, whereby electric vehicle charging points would be mandated in new buildings and dwellings (as well as those undergoing major refurbishment).</p> <p>The supporting text recognises that the provision of charging points are now mandated in developments (and will contain a footnote reference to the Building Regulations Approved Document S). The policy wording also recognises a need for new developments, where appropriate, to assist in helping to achieve a wider public charging network to help achieve the achievement of a net zero West Berkshire by 2030. The development of a local Electric Vehicle Charging Strategy guidance note will help developers to provide the necessary infrastructure required by the new Building Regulations and any further provision agreed through the development management process.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied. As such we would suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.</p> <p>Changes: Suggest that the requirement for EVCPs should not be included in the local plan because the Government's proposed changes to Building Regulations will provide a more effective framework for the delivery of charging points for electric vehicles.</p>	<p>The policy has now been worded to take into account the mandating the delivery of charging points into the Building Regulations. The policy seeks to work with developers, where appropriate, to go beyond the requirements to assist in developing a more comprehensive public charging network in West Berkshire.</p>
<b>Other stakeholders</b>		
Ian Parsons (lpr852)	<p>Public transport in the AONB is inconsistent - and heavily subsidised by parish councils. A council owned and operated bus service, similar to the one in Reading, would be welcomed, both for residents and visitors.</p>	<p>Comments noted. It is recognised that many rural parts of the district have no, or a very minimal bus service. Due to the difficulty in providing cost-effective transport in rural areas, the Council has encouraged and supported community transport. The Council has recently published a Bus Service Improvement Plan, which outlines that Demand Responsive Transport options are being investigated for rural areas where there are no bus services (e.g. between Hungerford and Lambourn).</p>
Councillor Tony Vickers (lpr665)	<p>We support this policy apart from wanting:  <b>1. Minor change regarding re-use of former railway lines</b>  The Hermitage to Hamstead Norreys cycle path has recently been completed. The current focus is the link between Hermitage and Newbury, which will require considerably most funding but also potentially have much greater benefits. There is also a need to explore the continuation of a safe off-road route, using the old railway line if possible, from Hampstead Norreys to Compton and beyond towards Didcot.  <b>2. Aim to reduce need to travel by car.</b></p>	<p>Comments noted. A link from Newbury to connect with the Hermitage to Hampstead Norreys former railway cycle path is recognised both as an important leisure and potential commuter cycling route, including being shown in the Council's Local Walking &amp; Cycling Infrastructure. The Council would be supportive of initiatives to develop and deliver a link from Newbury to the new Eling Way active travel path, as would opportunities to extend the route northwards to Compton.</p>

Respondent <i>(with lpr ref)</i>	Response	Council Response
	<p>The ideal transport policy would not rely on private car ownership at all. The concept of a “15-minute neighbourhood” applied to a sustainable modern settlement in a Climate Emergency would mean all daily needs can be met without a car.</p> <p>Changes:</p> <ol style="list-style-type: none"> <li>1. In 12.48 of Supporting Text, in last sentence replace “re-use the alignment” with “replace that part”; also delete all after “railway line to provide” and replace with: “..., between Hermitage and Newbury, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as necessary.”</li> <li>2. Somewhere in Supporting Text – preferably at the end of first para (12.44) or immediately after it, there needs to be a statement such as:-</li> </ol> <p>“At all stages in planning for a major development, proposals should consider ways of reducing the need to travel, especially during the working day. Where possible, all facilities needed on a daily basis should be located within a 15-minute journey time of a new place of employment or residence by means other than the private car. If necessary, facilities should be provided on site.”</p>	<p>Accessibility to main services and facilities, including education and employment has been a key consideration in the Council’s Housing &amp; Employment Sites Availability Assessment. This has included looking at walking and cycling distances, as well as the proximity to bus and rail services (and assessing service frequencies).</p>
<b>Landowners, site promoters and developers</b>		
<p>Deloitte for Green Park Business Park (lpr2034)</p>	<p>Policy DC35 identifies the types of transport infrastructure that new development will be expected to make a proportionate contribution towards. GPR wishes to emphasise the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park. This is vital to supporting West Berkshire and the wider Thames Valley area as it continues to grow as an important employment location.</p> <p>Changes: GPR therefore requests that an additional bullet point is included in Policy DC35 as follows: “Improvements to the M4 motorway and strategic road network in the Thames Valley.”</p>	<p>Comments noted. Policy DC35 specifically relates to where new development will be expected to contribute towards the provision or improvement of transport infrastructure. National Highways are a statutory consultee for both the Local Plan Review process and the development management process, where any potential new developments are located close to or may have an impact on the Strategic Road Network. Network Rail and GWR are also similarly consulted in terms of issues relating to the railway lines and rail services in the district.</p>

Respondent (with lpr ref)	Response	Council Response
Lichfield for North East Thatcham Consortium (lpr2405)	<p>We support the inclusion of this policy. The policy states “<i>new development will only be permitted where the relevant transport infrastructure is delivered in a timely manner</i>”; this is obviously important and will need to be factored into the appropriate phasing of development – and assessment of viability - undertaken through the next stages of the local plan.</p> <p>TPA’s note at Appendix 3 provides commentary on the “<i>proportionate contribution to the provision or improvement of a range of transport infrastructure</i>” that NET might provide.</p>	Comments noted.
Pro Vision for Feltham Properties (lpr2280)	<p>We welcome the inclusion of the provision of electric vehicle charging points and associated infrastructure within the scope of ‘transport infrastructure’ at Policy DC35. Provision of EV charging hubs or stations is likely to become in increasing demand over the plan period.</p> <p>Paragraph 12.49 of the Consultation Document acknowledges that developers will be encouraged to go further than charging points on all properties to help achieve a comprehensive public charging network in public car parks, supermarkets and retail parks, railway stations, and where is safe to do so, at petrol filling stations. However, the Local Plan provides no detail on how this will be achieved.</p> <p>Whilst it is envisaged that for the most part vehicle charging will take place at home, it should be recognised that a widespread charging point network is important for drivers who do high mileage, travel long distances or who do not have access to charging points at home or at work.</p> <p>The Ten Point Plan for a Green Industrial Revolution (November 2020) now increases the urgency for the development of charging infrastructure by bringing forward the ban of the sale of new petrol, diesel and most hybrid cars to 2030. As a result, delivering a widespread charging network is critical to encouraging the uptake of EV ownership. Indeed, the Government’s ‘Road to Zero’ (July 2018) Paper confirms that the Government’s ambition is that the UK should have one of the best and most comprehensive charging networks in the world.</p> <p>As a result, it is considered that to positively encourage the delivery of infrastructure for electric vehicles, the Local Plan should include a separate Policy (or be suitably incorporated into Policy DC35 and/or DC36) that seeks to actively encourage development for new electric vehicle charging infrastructure (e.g. charging stations) in suitable locations, including close to</p>	<p>Comments noted.</p> <p>The supporting text recognises that the provision of charging points are now mandated in new developments (with a footnote reference to the Building Regulations Approved Document S). It also recognises a need for new developments, where appropriate, to assist in helping to achieve a wider public charging network (including charging hubs or stations) to help achieve the achievement of a net zero West Berkshire by 2030. The development of a local Electric Vehicle Charging Strategy guidance note will help developers to provide the necessary infrastructure mandated by the new Building Regulations and any further provision agreed through the development management process.</p> <p>Amend the paragraph in the supporting text to take account of the new 2030 date for banning the sale of new petrol and diesel cars as follows –  ‘The provision of electric vehicle charging points and associated infrastructure supports the need for readiness for the banning <u>the sale</u> of new petrol, diesel or hybrid cars in the UK, which will occur during the lifetime of the plan, <u>by 2030 in 2035</u>.’</p> <p>Footnote links to the relevant strategy documents will be provided. Furthermore, this is likely to form part of the</p>

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
	the strategic road network, on primary transport routes, and close to existing areas of retail and leisure etc.	review of the Council's Local Transport Plan taking place during 2022.



## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC36 Parking and Travel Plans

#### (Proposed Submission LPR Policies: DM44 Parking and DM45 Travel Planning)

Number of responses received: 15

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
<b>Statutory consultees</b>		
Greenham Parish Council (lpr938)	<p>GPC would like to see Parking and travel as two separate issues, not one.</p> <p>GPC would like the creation of individual policies for Parking and Travel plans</p>	<p>Comments noted.</p> <p>A separate policy covering Travel Plans will be prepared for the Regulation 19 submission. The importance of the role for good travel planning to influence people's travel choices and behaviour is recognised.</p>
Hermitage Parish Council (lpr1819)	<p>We are very pleased to read and fully support the requirement for all new developments to include electrical charging points for all private homes</p> <p>We are also pleased to read and support the fact that garages do not count for the purpose of required parking spaces</p> <p>However, one point we would like to see incorporated into the policy, is a ban on collinear or continuous parking (see below for further details)</p> <p>We would like to see a ban on collinear parking, in the design of new developments.</p>	<p>Comments noted.</p> <p>Guidance on the design and layout of car parking will be covered in the Council's emerging Highways Design Guide for Residential Development.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>'The Chapter Aims' in section 8 of 'Manual of streets' as referred to in parking policy P1, states the following;  <i>Explain how the parking of vehicles is a key function of most streets in residential areas and that it needs to be <u>properly considered</u> in the design process.</i>  <i>Confirm that, having regard to the policy in Planning Policy Statement 3: Housing (PPS3), 1 designers need to <u>consider carefully how to accommodate the number of cars that are likely to be owned by residents</u> (Wales: refer to TAN 18: Transport 2).</i></p> <p>It is our belief that collinear parking is neither properly considered nor accommodates fully, the likely number of cars in a household.  Real life experience tells us that (for example) when a four bedroom property is designed with a carport and two linear parking spaces in front of the carport, neither the carport nor the next space get used, as the last car in would need to be moved to allow access to the other two spaces.  This design can lead to only a single car being parked on the driveway instead of three, consequently encouraging home owners to park on the road side.  We would therefore like to see all new developments move away from this design, with the introduction of the following (or similar) statement into the new parking policy;  Wherever possible, private off road parking spaces should be parallel to each other, not collinear and not blocking access to a garage or carport.</p>	
Newbury Town Council (lpr2221)	<ol style="list-style-type: none"> <li>1. Travel Plans should be in a separate</li> <li>2. Add reference to on-road parking outside Residents Parking Zones</li> </ol> <p>Reason:</p> <ol style="list-style-type: none"> <li>1. There is much more to travel planning than relates to It needs a separate policy because of its importance to spatial planning of new developments.</li> <li>2. With new on-road cycle lanes being introduced with the LCWIPs, we need to protect roadsides that are designated for cyclists as no-parking for all</li> </ol> <p>Changes:</p>	<p>Comments noted.</p> <p>A separate policy covering Travel Plans will be prepared for the Regulation 19 submission. The importance of the role for good travel planning to influence people's travel choices and behaviour is recognised.</p> <p>Route audits undertaken for the LCWIP included on-street car parking, which will be considered where new cycle schemes are developed. If a mandatory cycle lane is proposed (i.e. marked with a solid white line), then</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Completely re-word to emphasise that travel needs to be a core consideration in any major development, whether there is land for parking or not. It is the need for vehicular travel that Climate Emergency requires consideration of. This would then obviate the need for the first sentence in this part of Policy DC36.</p> <p>Add new paragraph immediately above current "Travel Plans": "Where any proposed development abuts a designated primary cycle route on a road that has insufficient width to provide that route segregated from vehicular traffic or pedestrians, the development must not result in additional on-road parking and should where possible enable any existing on-road parking to be accommodated within the This applies outside Residents Parking Zones and even beyond settlement boundaries – but not where speed limits are below 30mph."</p>	<p>motorists should never enter or park in it. If cycle lanes are advisory (i.e. marked with a hatched line), motorists should not enter or park in them if it is unavoidable. These issues will be considered on a scheme-by-scheme basis.</p> <p>These points will be considered in the re-draft of a new separate Travel Plans policy.</p> <p>The presence of a designated cycle route (such as those outlined in the Council's LCWIP) would be considered in the development application process.</p>
Shaw-cum-Donnington Parish Council (lpr262)	We support the policy.	Comment noted.
Stratfield Mortimer Parish Council (lpr443)	Supports the policy	Comment noted.
<b>General consultation bodies</b>		
AWE (lpr522)	<p>The policy advises that the provision of electric vehicle charging points should follow the requirements set out in the Council's guidance 'Electric Vehicle Charging Points for new development.' It is understood that no such guidance document currently exists and so it is not possible to advise if AWE consider the provision to be correct. However, providing AWE are consulted on the guidance document when it is produced then this is considered acceptable.</p> <p>With respect to non-residential car parking, the level of vehicular parking required should also take account of existing car parking that is provided and the occupants of the proposed development. Developments should not necessarily be required to provide additional car parking if existing spare car parking can accommodate the car parking demand. Similarly, if the</p>	<p>Comments noted.</p> <p>The provision of electric vehicle charging points and infrastructure in new developments is currently actively sought in the development management process and is now mandated in the English Building Regulations. The Council is also currently developing its own guidance to outline the requirements that developers will be expected to provide, a link to which will be included as a footnote.</p> <p>The onus would be on the applicant to provide evidence to demonstrate whether there is sufficient existing spare car</p>

Respondent (with lpr ref)	Response	Council Response
	development is not going to lead to an increase in the number of occupants of a development (e.g. in the event that a development is simply updating / improving the safety of an existing facility) then additional car parking should not necessarily have to be provided.	parking capacity that would be able to accommodate the demand.
<b>Other stakeholders</b>		
Keith Hoddinott (lpr1994)	<p>When will those formulating policies recognize the obvious fact that residents want and need cars. In towns such as the size of Newbury, public transport cannot be as comprehensive and frequent as in a large city to support a comprehensive &amp; frequent public transport system, whereby commuters can expect a bus/tram/underground every 10 minutes as in large cities such as London. In parts of Newbury, even a 30 minute service would be appreciated.</p> <p><b>The standard of 1.25 cars per household is totally unrealistic.</b> It is ironic that on estates built in the 1950's (such as Chestnut Crescent), when house holders probably had few cars, there is now plenty of space for off street parking (in most cases 3 or more), and that most properties actually have 3 or more vehicles. Contrast this with some modern estates, where the density is so intense &amp; parking spaces limited to 2 or less, that parking has to be on the pavements and makes driving through hazardous. Of course, developers accede to these requirements, as they can increase the density of units. The social climate at the moment means that the majority of households need 2, 3 or more cars. Even those who perhaps no longer drive will have visitors &amp; carers. The cost of acquiring a house/apartment/flat has meant that more households are becoming multi-generational.</p> <p>It would be interesting to know how many officers, councillors, &amp; developers have 2 or more vehicles!!</p> <p>With the high cost of housing for first time buyers &amp; un-affordable for renters, homes are becoming multi-generational, &amp; several parking spaces are required (given the preponderance of vans etc. used by individuals working from home). The standards set are totally inadequate for current (&amp; foreseeable) lifestyles, but eagerly accepted by developers as they can achieve higher densities of properties. It was disappointing that the proposals at Market Street did not encompass more underground parking.</p> <p>Changes:</p>	<p>Comments noted.</p> <p>The residential parking standards were developed as part of the Council's Housing Site Allocations DPD, underpinned by a robust evidence base. These standards were then considered at a Public Examination in front of a Planning Inspector in 2016. Upon considering the evidence and representations, the Inspector concluded that the standards presented were sound, and were formally adopted by the Council in 2017.</p>

Respondent (with lpr ref)	Response	Council Response																																
	<u><i>In a country short of horizontal space, planners, architects, engineers &amp; developers should think vertically in order to make the most efficient use of the horizontal area of any proposed developments.</i></u>																																	
Simon Pike on behalf of town councillors from West Thatcham ward (lpr2312)	<p>The policy on parking places the whole of the area within the current settlement boundary for Thatcham in Zone 2 for Residential Parking for New Development (apart, oddly from a small area to the north of Westfield Road). We understand that was last reviewed for the 2016 DPD. This is in contrast to Newbury, where the most of the town away from the centre is in Zone 3, and Hungerford, where the whole town is in Zone 3. Zone 3 provides an additional 0.25 parking spaces for one and two bedroom flats, as shown in the table below. These figures are given as the minimum; however, our experience is that they are also in practice the maximum for dense housing developments.</p> <table border="1" data-bbox="436 742 1310 922"> <thead> <tr> <th></th> <th colspan="3">Flats</th> <th colspan="4">Houses</th> </tr> <tr> <th>Bedrooms</th> <th>1</th> <th>2</th> <th>3</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>Zone 2</td> <td>1.25</td> <td>1.5</td> <td>2</td> <td>1.25</td> <td>2</td> <td>2.5</td> <td>2.5</td> </tr> <tr> <td>Zone 3</td> <td>1.5</td> <td>1.75</td> <td>2</td> <td>1.5</td> <td>2</td> <td>2.5</td> <td>3</td> </tr> </tbody> </table> <p>The new development of Francis Close in West Thatcham, on the corner of Bath Road and Henwick Lane, has since demonstrated that the allocation of parking spaces for flats in Zone 2 is inadequate. This development comprises seven houses and 38 flats (mostly one or two bedroom). Since the development was completed, around a dozen cars have been parked on the neighbouring streets of Henwick Lane, Barfield Road and Roman Way. This has caused obstruction of both the carriageway and pavements, and inconvenience to residents.</p> <p>This number of cars needing to park on the street roughly corresponds to the difference between the Zone 2 and Zone 3 parking allocations. The evidence of Francis Close therefore clearly demonstrates that the parking allocation of Zone 3 is necessary to accommodate the vehicle of residents of new developments.</p>		Flats			Houses				Bedrooms	1	2	3	1	2	3	4	Zone 2	1.25	1.5	2	1.25	2	2.5	2.5	Zone 3	1.5	1.75	2	1.5	2	2.5	3	<p>Comments noted.</p> <p>The areas covered by the Zones in the residential parking standards will be reviewed to ensure that there is consistency in time for the Regulation 19 submission.</p> <p>The decision as whether an application is an exception case will be determined on a case-by-case basis.</p>
	Flats			Houses																														
Bedrooms	1	2	3	1	2	3	4																											
Zone 2	1.25	1.5	2	1.25	2	2.5	2.5																											
Zone 3	1.5	1.75	2	1.5	2	2.5	3																											

Respondent (with lpr ref)	Response	Council Response
	<p>Thattham Town Council has declared a climate emergency, and the Councillors therefore do not wish to encourage unnecessary use of private cars. However, our experience is that constraining the number of parking spaces does not of itself reduce car ownership or use - it merely results in antisocial and dangerous parking in neighbouring streets.</p> <p>Car ownership may well change significantly during the period of the Local Plan, but it is too early to build specific assumptions on this into the plan.</p> <p>Changes:</p> <p>1) The whole of the area of the settlement boundary of Thattham should be in Zone 3 for Residential Parking for New Development, as is already the case for the whole of Hungerford and the suburban part of Newbury. This should also apply to any extensions of the settlement boundary for Thattham that might result from the Local Plan review. The map in appendix 7 of the 'Local Plan Review 2020 - 2037: Emerging Draft' document should therefore be modified accordingly.</p> <p>2) The circumstances in which exceptional cases to the policy applies should be clarified:</p> <p>There may be exceptional circumstances where there is a case for providing parking that does not accord with the above levels. These cases will be considered on an individual basis, <b><u>where it can be demonstrated that the car ownership of the expected demographic of residents will be below the average.</u></b></p>	
Councillor Alan Marco (lpr764)	<p>Agree with policy for residential parking. However, requirements for the most common forms of non-residential development should be given to give developers and residents certainty.</p> <p>Changes:</p> <p>Requirements for the most common forms of non-residential development, e.g. office and retail, should be given.</p>	<p>Comments noted.</p> <p>It is recognised that the current non-residential standards are based on maximum standards and are now out of date. A set of new non-residential standards or guidance relating to how the LPA will approach their assessment will be developed in due course.</p>
Councillor Tony Vickers (lpr666)	<p>We support this policy but:</p> <ol style="list-style-type: none"> <li>1. Travel Plans should be in a separate policy.</li> <li>2. We wish to add reference to on-road parking <b>outside</b> Residents Parking Zones</li> </ol>	<p>Comments noted.</p> <p>A separate policy covering Travel Plans will be prepared for the Regulation 19 submission. The importance of the</p>

Respondent (with lpr ref)	Response	Council Response
	<ol style="list-style-type: none"> <li>3. Garages that are significantly larger than British Standard should be allowed to count as parking spaces.</li> <li>4. Requirements for parking for the most common types of non-residential development should also be given here.</li> <li>1. There is much more to travel planning than relates to parking. It needs a separate policy because of its importance to spatial planning of new developments.</li> <li>2. With new on-road cycle lanes being introduced with the LCWIPs, we need to protect roadsides that are designated for cyclists as no-parking for all vehicles.</li> <li>3. It is largely because the BS for parking space and garage size has not kept pace with the increase in width of cars that garages are no longer capable of being used for parking cars. Cars are also built to be more resistant to rust and theft, so can be left unsecured by lockable garage doors. However there seems no reason to disallow garages as part of good design, because parked vehicles can detract from the urban landscape especially in Conservation Areas.</li> <li>4. We thought that there are already parking standards at either national or local level for non-residential developments. If not there should be and they should be at least referenced here.</li> </ol> <p>Changes:</p> <ol style="list-style-type: none"> <li>1. Have a separate Travel Planning DC policy. Completely re-word to emphasise that travel needs to be a core consideration in any major development, whether there is land for parking or not. It is the need for vehicular travel that Climate Emergency requires consideration of. This would then obviate the need for the first sentence in this part of Policy DC 36.</li> <li>2. Add new paragraph immediately above current “Travel Plans”: “Where any proposed development abuts a designated primary cycle route on a road that has insufficient width to provide that route segregated from vehicular traffic or pedestrians, the development must not result in additional on-road parking and should where possible enable any existing on-road parking to be accommodated</li> </ol>	<p>role for good travel planning to influence people’s travel choices and behaviour is recognised.</p> <p>A set of new non-residential standards or guidance relating to how the LPA will approach their assessment will be developed in due course.</p> <p>(see NTC response – lpr2221)</p> <p>The issue of not counting garages as parking spaces was considered at Public Examination by an Inspector as part of the Housing Sites Allocations DPD in 2016.</p> <p>The development of parking standards are left for local councils to determine, as they know what would work best for their area.</p> <p>See above.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>within the site. This applies outside Residents Parking Zones and even beyond settlement boundaries – but not where speed limits are below 30mph.”</p> <p>3. Amend the paragraph on garages and car ports: “Garages will not <b>normally</b> be counted as parking <b>spaces</b> for the purposes of meeting the required levels of parking set out in this policy. <b>However well-designed car ports and garages capable of taking modern cars and well integrated with the overall design of the property may be accepted as parking spaces.</b>”</p> <p>4. No specific changes proposed but a response to this comment given.</p>	<p>This was considered in detail by the Inspector as part of the Housing Sites Allocations DPD Inquiry in 2016.</p>
<b>Landowners, site promoters and developers</b>		
<p>Lichfield for North East Thatcham Partnership (lpr2406)</p>	<p>We support this policy. To promote the use of sustainable modes of transport a Travel Plan will be developed and implemented at NET, while parking provision will be consistent with local standards.</p> <p>With regards to electric vehicle charging points, we do not object to their inclusion in the scheme but would wish to see it acknowledged that the technology will develop rapidly over the course of the delivery of NET and we would expect to see some flexibility in delivery to factor in future changes as appropriate.</p>	<p>Comments noted.</p> <p>There will be separate policies for Parking and Travel Plans for the Regulation 19 submission.</p> <p>The provision of electric vehicle charging points and infrastructure is currently actively sought in the development management process, although this is now mandated as part of the English Building Regulations. The Council is also currently developing its own guidance to outline the requirements that developers will be expected to provide, which will also be agile enough to respond to changes in technologies that are likely to arise during the lifetime of the plan.</p>
<p>Lochailort Newbury Ltd. (lpr2042)</p>	<p>We object to the inflexibility of the minimum car parking standards set out in draft Policy DC36. The policy directly and indirectly encourages car ownership and usage to the detriment of other more sustainable forms of travel, and threatens the delivery of the Council’s target of net zero carbon by 2030.</p>	<p>Comments noted.</p> <p>The residential parking standards were developed as part of the Council’s Housing Sites Allocations DPD, underpinned by a robust evidence base. These standards were then considered at a Public Examination in front of a Planning Inspector in 2016. Upon considering the</p>



Respondent (with lpr ref)	Response	Council Response
	<p>In order to mitigate this risk, the weakly phrased exception text in draft Policy DC36 should be amended as follows:</p> <p>"There may be exceptional circumstances where there is a case for providing parking that does not accord with the above levels. These cases will be considered on an individual basis. (delete these sentences) It will increasingly be the case that the level of onsite car parking should be reduced in the most sustainable locations. Where developments can demonstrate that non car-based travel modes have been maximised (for example through the implementation of car share schemes, by virtue of proximity to public transport hubs, or through enhanced cyclists' facilities) a reduced level of onsite car parking will be actively supported. Residential car parking within defined town centres will not be required to have regard to the minimum provision set out in this policy but instead will be assessed on an individual basis."</p>	<p>evidence and representations, the Inspector concluded that the standards were sound, and were formally adopted by the Council in 2017.</p> <p>This highlights the need to balance provision of parking and the support of the climate emergency and encouragement not to own / use personal cars as the primary form of transport but to make use of other transport choices including car clubs where the car is the most practical option.</p>
Pegasus for Donnington New Homes (lpr1950)	<p><i>Representation on behalf of Donnington New Homes in support of continued allocation of Sandford Park</i></p> <p><u>Objection</u> is raised to this Policy as drafted because it excludes garages from being counted as part of parking provision on housing sites. No justification has been provided for this. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. For comparison, <b>BCP Council's "Parking Standards SPD"</b> (adopted January 2021) allows garages to be counted as parking spaces where they meet minimum size requirements of 7m x 3.3m. Paragraphs 3.2.10 - 3.2.11 of this SPD state: <i>"Research has shown that in many developments less than half of all garages are used for car parking, instead being used for storage. In terms of sizes, an internal minimum of 7m x 3.3m is considered appropriate to ensure that a large modern family car (eg SUV) will fit comfortably with a minimum circulation space to allow for some general storage which may include cycles..."</i></p>	<p>Comments noted.</p> <p>The issue of excluding garages from being counted as parking spaces was considered as part of the development of the Council's current residential parking standards, included as part of the Local Plan Housing Sites Allocations DPD, adopted May 2017. The process to develop the standards included consultation and presented before a Planning Inspector.</p> <p>Visitor parking is considered as part of the residential parking standards</p>

Respondent (with lpr ref)	Response	Council Response
	<p><i>"This 7m x 3.3m must be a clear, unobstructed space to allow a vehicle to enter and exit safely. Garages must also have entrances wide and high enough to allow for large family cars.....Garages will only be counted as a parking space where they meet the minimum size requirements..."</i></p> <p>It is recommended that the Council takes this approach to the treatment of garages as parking spaces. Otherwise, to completely discount garages from every housing site's parking provision will have significant negative effects on the efficient use of land, contrary to Government guidance.</p> <p>The Policy also fails to acknowledge and allow for the valuable contribution that on-street car parking can make to parking provision on a site, particularly for visitors. It is considered that the Policy, as drafted, lacks sufficient detail to address these issues and that a new Parking SPD should be prepared and adopted by the Council to address this matter.</p> <p>It is recommended that the Council takes alternative approach to the treatment of garages as parking spaces, as outlined.</p> <p>A new Parking SPD should be prepared and adopted by the Council to address the matter of on-street parking.</p>	
Potential Ltd for Aldi Stores (lpr2290)	<p>Policy DC 36 'Parking and Travel Plans' states that electric vehicle charging points should be installed for all development. We support this approach and consider it beneficial to help tackle climate change moving forward.</p> <p>Considering the level of vehicular parking required on a case-by-case basis taking account of the accessibility of the development, the type, mix and use of development, and the availability of and opportunities for public transport ensures that sufficient parking will be delivered by new development.</p> <p>However, the Council should recognise that onerous parking requirements for development can make the delivery and redevelopment of sites unviable.</p>	<p>Comments noted.</p> <p>The provision of electric vehicle charging points and infrastructure is currently actively sought in the development management process, although this is now mandated for new buildings/dwellings (or those undergoing major refurbishment) as part of the English Building Regulations (Approved Document S). The Council is also currently developing its own guidance to outline the requirements that developers will be expected to provide.</p> <p>The quantum of parking required is guided by the Council's residential parking standards, which have been developed taking cognisance of a detailed evidence base. They were subject to consultation and scrutiny by a Planning Inspector at Public Examination in 2016 prior to being adopted.</p>

Respondent (with lpr ref)	Response	Council Response
Pro Vision for Feltham Properties (lpr2285)	<p><i>(comments repeated under DC35)</i></p> <p>We welcome the inclusion of the provision of electric vehicle charging points and associated infrastructure within the scope of ‘transport infrastructure’ at Policy DC35. Provision of EV charging hubs or stations is likely to become in increasing demand over the plan period.</p> <p>Paragraph 12.49 of the Consultation Document acknowledges that developers will be encouraged to go further than charging points on all properties to help achieve a comprehensive public charging network in public car parks, supermarkets and retail parks, railway stations, and where is safe to do so, at petrol filling stations. However, the Local Plan provides no detail on how this will be achieved.</p> <p>Whilst it is envisaged that for the most part vehicle charging will take place at home, it should be recognised that a widespread charging point network is important for drivers who do high mileage, travel long distances or who do not have access to charging points at home or at work.</p> <p>The Ten Point Plan for a Green Industrial Revolution (November 2020) now increases the urgency for the development of charging infrastructure by bringing forward the ban of the sale of new petrol, diesel and most hybrid cars to 2030. As a result, delivering a widespread charging network is critical to encouraging the uptake of EV ownership. Indeed, the Government’s ‘Road to Zero’ (July 2018) Paper confirms that the Government’s ambition is that the UK should have one of the best and most comprehensive charging networks in the world.</p> <p>As a result, it is considered that to positively encourage the delivery of infrastructure for electric vehicles, the Local Plan should include a separate Policy (or be suitably incorporated into Policy DC35 and/or DC36) that seeks to actively encourage development for new electric vehicle charging infrastructure (e.g. charging stations) in suitable locations, including close to the strategic road network, on primary transport routes, and close to existing areas of retail and leisure etc.</p>	<p>Comments noted.</p> <p>The provision of electric vehicle charging points and infrastructure is currently actively sought in the development management process and will remain the case in the Local Plan Review. The Council is also currently developing its own guidance to outline the requirements that developers will be expected to provide. The UK Government has recently announced that new homes and buildings, including those undergoing renovation will be required to install EVCP’s from 2022, to be included as part of English Building Regulations.</p> <p>Proposals for charging points on the Strategic or Primary Road Network, along at existing retail/leisure areas may be guided by a wider approach (e.g. TfSE), and will be considered further as part of the review of the Council’s Local Transport Plan, due to commence in 2022.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC37 Public Open Space

### (Proposed Submission LPR Policy: DM40 Public Open Space)

Number of responses received: 14

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr785)	Supports the policy. Archaeological monuments discovered during the evaluation of development sites can often be preserved in situ under public open space.	Comments noted.
Ecologist, West Berkshire Council (lpr1697)	In (d) in the policy, there is a trade-off between access to nature/recreation use and biodiversity.	Comments noted
<b>Statutory consultees</b>		
Burghfield NDP Steering Group (lpr476)	The Burghfield Neighbourhood Development Plan Steering Committee support the overall principle of "Proposals for residential development of 10 dwellings or more will provide high quality public open space". This is because this facet of development has been specifically identified during the work to produce an NDP.	Support noted
Newbury Town Council (lpr2220)	We support a generous provision of public open space in all housing developments. 'Public' means public. Public space should not be exclusive to any specific development but rather should include the wider community.	Comments noted

Respondent (with lpr ref)	Response	Council Response
Shaw-cum-Donnington Parish Council (lpr263)	We support the policy.	Support noted
Stratfield Mortimer Parish Council (lpr444)	Supports the policy	Support noted
<b>General consultation bodies</b>		
British Horse Society (lpr881)	<p>To encourage active travel and deter car use, it is vital that connectivity by non-motorised means is preserved and maintained.</p> <p>Horses have been ridden (and driven) through villages since time immemorial, it should be made possible for them to pass through new residential development unless there are clear, well-defined reasons as to why this is not thought appropriate.</p> <p>Changes:</p> <p><i>(f) Its easy and safe accessibility from adjoining development areas by foot, cycle <b>and horse, connectivity to any local public rights of way and where necessary, public transport; and</b></i></p>	<p>Comments noted.</p> <p>This policy will be read in conjunction with other policies in the LPR including Policy SP10 Green Infrastructure. The Council will strengthen Policy SP10 by adding additional wording to the 5<sup>th</sup> paragraph of the policy as follows – <u>‘Development proposals must take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new connections and status upgrades to the existing rights of way network will be supported.’</u></p>
Heritage Forum (lpr97)	A maintenance agreement will be needed for each such public open space, and legally enforceable arrangements to contribute to the cost. The companies carrying out such work should be credible in the longer term.	<p>Comments noted.</p> <p>The issues raised are covered by the Planning Obligations Supplementary Planning Document and so no changes to the policy are required.</p>
Mid and West Berkshire Local Access Forum (lpr1892)	<p>To encourage active travel and deter car use, it is vital that connectivity by non-motorised means is preserved and maintained – including to the network of public rights of way.</p> <p>In its comment on policy DC2, Health and Wellbeing, MWBLAF pointed out that Dog walking is a popular way of taking physical activity including those</p>	<p>Comments noted.</p> <p>This policy will be read in conjunction with other policies in the LPR including Policy SP10 Green Infrastructure. The Council agrees that rights of way have an important role in</p>

Respondent (with lpr ref)	Response	Council Response
	<p>in older age groups. It is therefore important that dog walking is taken into account in the selection and design of public open spaces. We note that Hampshire County Council has a guidance document on planning for dog ownership in new developments; the paragraph that we suggest be added to the supporting text of this policy is based on the introduction to this document.</p> <p>The Forum would encourage West Berkshire Council to develop guidance on this topic, or perhaps to make use of the Hampshire County Council document "Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value":  <a href="https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf">https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf</a></p> <p>Changes:</p> <p>1) The Forum recommends that connectivity to any local public rights of way should be a consideration for public open spaces:  Particular regard will be given to;  (f) Its easy and safe accessibility from adjoining development areas by foot and cycle, <u>connectivity to any local public rights of way</u>, and where necessary, public transport;</p> <p>2) We recommend that a paragraph is added to the supporting text, addressing the importance of considering the needs of dog owners:  <u>Dog owners are traditionally one of the most frequent, year-round users of urban open space and public access to the wider countryside. Owning a dog – or the aspiration to do so – has a significant influence on where people choose to live. Furthermore, once moved in, a dog in the home has a profound impact on where family members go and what they do. It is therefore important that the location, design and access to in and around new housing recognises the fundamentally different needs of dog owners, compared to residents without dogs</u></p>	<p>the green infrastructure network and so will strengthen Policy SP10 by adding additional wording to the 5<sup>th</sup> paragraph of the policy as follows –  <u>'Development proposals must take account of existing access networks within and around the site. Opportunities should be sought to protect and enhance the Public Rights of Way network within and adjacent to development proposals in line with the NPPF, having particular regard to ensuring the needs of all users have been provided throughout the year. The addition of new connections and status upgrades to the existing rights of way network will be supported.'</u></p> <p>To add additional text in the supporting text specifically for dog owners is considered too detailed for this broad policy. It is noted that Hampshire County Council produced a separate SPD on this issue. If considered appropriate, additional guidance could be developed by the Council at a later date.</p>
The Woodland Trust (lpr1003)	<p>We support the principle that residential developments should have access to the natural environment, including to woodland.</p> <p>We recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation.</p> <p>Changes:</p>	<p>Comments noted.</p> <p>This policy will be read in conjunction with other policies in the LPR including Proposed Submission LPR Policy SP10 Green Infrastructure, SP11 Biodiversity and Geodiversity</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Natural England’s Accessible Natural Green Space Standard recommends that all people should have accessible natural green space: Of at least two hectares in size, no more than 300m (five minutes’ walk) from home. At least one accessible 20-hectare site within 2km of home. One accessible 100-hectare site within 5km of home. One accessible 500-hectare site within 10km of home. A minimum of one hectare of statutory local nature reserves per 1,000 people. The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.</p>	<p>and DM15 Trees, Woodland and Hedgerows which set out the Council’s approach to the issues raised.</p>
<b>Other stakeholders</b>		
Ian Parsons (lpr844)	Supports the policy	Support noted
Councillor Tony Vickers (lpr667)	<p>We support this policy but it should be explicitly stated that “public” means accessible to all. We support a generous allocation of public open space. However it must be made clear that this space is available to all persons lawfully entitled to be present, not just the occupants of the development. It must also not be enclosed: for example to provide allotments, which should be given a separate allocation. Changes: In 12.55, amend the first sentence from: “...needs of the <b>whole</b> community, <b>not just occupants of the development, other than in exceptional cases.</b>”</p>	<p>Comments noted.  Para 12.66 of the supporting text makes clear that ‘<i>Public open space should be genuinely available to the public at large.....</i>’  Para 12.55 also notes ‘<i>Public open space is land available to satisfy the recreation and leisure needs of the community. It can fulfil a number of functions including amenity land, play areas, informal recreation and leisure or formal sporting activity. It will also fulfil an important function in supporting the overall green infrastructure in the district.</i>’</p>

Respondent (with lpr ref)	Response	Council Response
		<p>Para 12.59 goes on to say that ‘open space that is provided with the intention of being used exclusively by residents will not be an acceptable alternative to public open space provision.....’</p> <p>No changes to the policy are proposed.</p>
<p>Councillor Tony Vickers (lpr1654)</p>	<p>“Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value”: Can we perhaps put something in DC 37 about this? It could also get a mention under “Health &amp; Wellbeing” DC2</p>	<p>Comments noted.</p> <p>To add additional text in the supporting text specifically for dog owners is considered too detailed for this broad policy. It is noted that Hampshire County Council produced a separate SPD on this issue. If considered appropriate, additional guidance could be developed by the Council at a later date.</p>
<p><b>Landowners, site promoters and developers</b></p>		
<p>Fowler Architecture and Planning (lpr1811)</p>	<p>While it is recognised that new residential development of 10 or more dwellings should provide high quality open space meeting a standard, the policy must be revised to recognise that the need to provide open space will depend on the existing qualitative surplus / deficit of open space in the locality. Given existing provision elsewhere, not all residential developments may need to provide public open space.</p> <p>The standard of 3 – 4.3ha per 1000 population should be defined as to what typologies of open space this relates to. It may not be possible for all sites to provide public open space on-site that can fulfil a number of functions including amenity land, play areas, informal recreation and leisure or formal sporting activity. For instance, formal sporting activity will not be feasible on-site in all but the largest developments.</p> <p>The range of functions of public open space at 12.55 should recognise the function and value of Accessible Natural Greenspace (ANG) in urban and rural areas as a separate typology of open space that provides informal recreation in a natural environment where biodiversity enhancement is a key principle.</p>	<p>Comments noted.</p> <p>The Council considers the policy is sufficiently flexible to cover a range of situations. The policy uses the following wording - “<b>wherever possible</b>” and <i>where more appropriate to the circumstances of the site or the open space requirements</i>”.</p> <p>Amend Emerging Draft LPR paragraph 12.55 as follows – ‘Public open space is land available to satisfy the recreation and leisure needs of the community. It can fulfil a number of functions including amenity land, <u>Accessible Natural Greenspace (ANG)</u>, play areas, informal recreation and leisure or formal sporting activity. It will also fulfil an important function in supporting the overall green infrastructure in the district.’</p>





## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR Policy: DC38 Promotion of FTTP (fibre to the premises)

### (Proposed Submission LPR Policy: DM41 Digital Infrastructure)

Number of responses received: 11

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Burghfield NDP Steering Group (lpr477)	The Burghfield Neighbourhood Development Plan Steering Committee support the overall policy of "Promotion of FTTP (fibre to the premises)" because the parish residents need faster internet access than at present.	Support for policy noted
Hermitage Parish Council (lpr1815)	Hermitage PC believes that high speed broadband access is now essential everywhere. It is also essential that mobile phone signals are greatly improved as the signal is so poor in parts of the parish, e.g. Hermitage Green.	Comments noted.
Newbury Town Council	We support and encourage this policy.  We would like to see broadband infrastructure funded by the CIL pot.	Support for policy noted.  Emerging Draft LPR Policy SP23 (Infrastructure Requirements and Delivery) supports digital infrastructure.  The Infrastructure Delivery Plan consultation in March 2021 did not put forward any comments/suggests in relation to digital infrastructure, or more importantly

Respondent (with lpr ref)	Response	Council Response
		<p>infrastructure projects from any of the digital infrastructure providers.</p> <p>Community Infrastructure Levy (CIL) cannot be handed over to an external provider (private company/organisation) but the Council can work with providers on projects – not studies or personnel or project management funding – but on actual infrastructure.</p>
Shaw-Cum-Donnington Parish Council (lpr267)	<p>DC38 Promotion of FTTP. (Fibre to the premises)</p> <p>We think this policy is beyond the control of the local authority. Although a laudable aim, how is it intended to achieve it? Normally telecommunications facilities are provided by the appropriate telecommunications companies and come with arrangements between the developer and telecom provider with no requirements by way of the planning permission. As with the other code operators (gas, electricity and water) these providers are not under the control of the local authority.</p>	<p>Although Government and the National Planning Policy Framework (NPPF)<sup>1</sup> both support and encourage the inclusion of high speed broadband, there are no statutory requirements which support this aspiration. Local planning authorities can, however encourage and support high speed broadband provision within new development sites.</p> <p>The Government's guidance 'Digital and telecoms: resources for local authorities'<sup>1</sup> sets out that Local Planning Authorities have a crucial role in the deployment of fibre infrastructure.</p> <p>The guidance comments that local authorities can help to create incentives for future investment in digital infrastructure in their area by ensuring Local Plans effectively support it. To do this Local Plans can outline how planning policies will support the rollout of fixed and mobile infrastructure.</p> <p>The National Planning Policy Framework (NPPF)<sup>2</sup> at paragraph 114 states that Local Planning Authorities should support the expansion of electronic</p>

<sup>1</sup> Digital and telecoms: resources for local authorities: <https://www.gov.uk/guidance/resources-for-local-authorities#guidance-for-the-local-planning-authority>

<sup>2</sup> National Planning Policy Framework (July 2021): <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Respondent (with lpr ref)	Response	Council Response
		<p>communications networks including full fibre broadband connections.</p> <p>Paragraph 114 goes on to state that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide an optimum solution).</p> <p>Through the Berkshire Digital Infrastructure Group<sup>3</sup>, the Berkshire Unitary Authorities are implementing a Digital Strategy and have set-out a “Connected Berkshire Vision and Strategy” to ensure that over 95% of households and business have access to full fibre coverage (providing Gigabit capable connectivity) and to eliminate all 4G poor coverage areas by 2025.</p> <p>To help achieve the strategy, a suite of guidance is in preparation which will include planning guidance, a Dig-Once approach, and a universal wayleaves agreement.</p>
Stratfield Mortimer Parish Council (lpr445)	Do you agree with the proposed policy? Yes	Support for policy noted
<b>General consultation bodies</b>		
Heritage Forum (lpr107)	Do you agree with the proposed policy? Yes	Support for policy noted

<sup>3</sup> Berkshire Digital Infrastructure Group: <http://www.thamesvalleyberkshire.co.uk/digital-infrastructure-group>

Respondent (with lpr ref)	Response	Council Response
West Berkshire Green Party (lpr1846)	Change “presumption in favour of” to “requirement” for developments of more than 10 homes (0.5ha) except where this is impossible.	<p>The policy does not include the wording ‘presumption in favour of’.</p> <p>Since 1 April 2020, developers building sites of 20 or more dwellings have been eligible to have full fibre connectivity built across their sites at no cost if they register with Openreach.</p>
<b>Other stakeholders</b>		
Gary Clarke (lpr707)	Absolute necessity as the full potential of working from home is realised cutting commuter miles and improving quality of life.	Support for policy noted
Ian Parsons (lpr823)	It is likely to be the case that home working will increase, given the events of 2020, and so it would be beneficial if the district council were able to support a greater range of fast internet suppliers than, in the case of Basildon, are currently available. At present we are in the hands of a virtual monopoly - Gigaclear.	<p>Through the Berkshire Digital Infrastructure Group, the Berkshire Unitary Authorities have set-out a “Connected Berkshire Vision and Strategy” to ensure that over 95% of households and business have access to full fibre coverage (providing Gigabit capable connectivity) and to eliminate all 4G poor coverage areas by 2025.</p> <p>A key factor in achieving the objectives of the Digital Strategy is to help reduce the commercial roll out costs for the market and suppliers, especially in more rural and remote areas. Minimising construction costs for connectivity in new developments is a critical component of this and will be supported by guidance in the Berkshire Dig-Once Strategy.</p>
Graham Storey (lpr596)	<p>FTTP should be mandatory in new developments.</p> <p>Changes: Change to a requirement for developments of over 10 homes (0.5Ha)– unless it is not possible to deliver.</p>	<p>Since 1 April 2020, developers building sites of 20 or more dwellings have been eligible to have full fibre connectivity built across their sites at no cost if they register with Openreach.</p> <p>The policy cannot therefore be amended as suggested.</p>
Councillor Tony Vickers (lpr668)	The Internet is arguably a more important means of communication than road transport and likely to remain so.	Support for policy noted

Respondent <i>(with lpr ref)</i>	Response	Council Response
<b>Landowners, site promoters and developers</b>		
None		

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR Policy: DC39 Local shops, farm shops and community facilities****(Proposed Submission LPR Policy: DM39 Local Community Facilities)**

Number of responses received: 12

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Newbury Town Council (lpr2218)	Developers must provide a more generous and flexible allocation of land for community facilities and provide it earlier in the build – done in partnership with the local council(s).	<p>Comments noted. Developer contributions are sought on most new development within the District. These contributions are sought in order to provide for additional facilities and infrastructure demands as a result of new development.</p> <p>Where a development is large enough to support additional facilities on site (for example, strategic in size), these will be provided.</p> <p>Policy SP23 of the Emerging Draft LPR sets out the planning policy approach for infrastructure requirements and delivery.</p>
Shaw cum Donnington Parish Council (lpr265)	We support the policy. It is a pity that there is no requirement to provide local shops and commercial facilities in new residential developments.	Comments noted. Developer contributions are sought on most new development within the District. These contributions are sought in order to provide for additional facilities and infrastructure demands as a result of new development.

Respondent (with lpr ref)	Response	Council Response
		<p>Where a development is large enough to support additional facilities on site (for example, strategic in size), these will be provided.</p> <p>Policy SP23 of the Emerging Draft LPR sets out the planning policy approach for infrastructure requirements and delivery.</p>
Stratfield Mortimer Parish Council (lpr446)	Policy is supported.	Comments noted.
Thatcham Town Council (lpr1418)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <ul style="list-style-type: none"> <li>"New developments of 1,500 homes or more will be expected to include a local shop as part of the development scheme, located so as to maximise footfall and links to the existing community."</li> </ul> <p>This threshold is unclear, and there is no indication as to how this policy scales if developments are substantially more than 1,500 homes. Does a single local shop apply equally for 1,500 homes and 10,000 homes?</p> <p>There is no indication to phasing. Is it the intention of the policy that a local shop is delivered at the completion of a development, or near to the beginning?</p> <p>The policy as written indicates that the entirety of NE Thatcham could be served by the inclusion of 1 shop. We do not think that the NE Thatcham development, that has the equivalent scale of a New Town the size of Hungerford, should aspire to be served by one shop. This appears to be a wholly inadequate approach to securing community services.</p> <p>It is necessary for the policy to define how the support for local shops increases with the number of dwellings, and phasing. A strategic approach</p>	<p>Comments noted. Strategic sites within the LPR have a site specific policy which sets out the detail in relation to the infrastructure provision for the site. In this case, see Council's full response to comments under Emerging Draft LPR Policy SP17.</p> <p>Emerging Draft LPR Policy DC39 to be amended to remove the second paragraph of the policy as it is considered sites of this size should be comprehensively masterplanned and include the necessary infrastructure to meet the needs of the proposed development.</p> <p>With regard to meeting the need of the existing community, the Emerging Draft LPR policy and supporting text will be amended to clarify that the policy relates to the provision and retention of local community facilities in both new and existing communities.</p>



Respondent (with lpr ref)	Response	Council Response
	<p>must be defined that relates to developments that are on the scale of a new town.</p> <ul style="list-style-type: none"> <li>"presumption in favour of the provision of new or enhanced community facilities"</li> </ul> <p>It is clear that a new development must meet the needs of a new community. It is unclear as to the provision that will be provided to existing adjacent communities if there is an existing shortfall on identified services - for examples larger libraries, dentists, GP surgeries, policing presence, leisure centre, etc. This is relevant for Thatcham where it is recognised in the Thatcham Stage 1 report that there the town is under provisioned relative to towns of a similar size.</p> <p>It is necessary for policy to reflect on the needs of adjacent communities.</p> <p>Changes to be made/preferred approach: It is necessary for the policy to define how the support for local shops increases with the number of dwellings, and phasing. A strategic approach must be defined that relates to developments that are on the scale of a new town.</p> <p>It is necessary for policy to reflect on the needs of adjacent communities.</p>	
<b>General consultation bodies</b>		
West Berkshire Heritage Forum (lpr98)	<p>Policy is supported.</p> <p>Community uses should include meeting venues for voluntary bodies, such as was provided by Greenham Arts before it was redeveloped. There is a currently a lack of these, which are largely limited to church halls, and will be needed again after Covid problems are overcome.</p>	Comments noted.
Theatres Trust (lpr1011)	<p>The Trust welcomes this policy and the protection it affords to supporting and protecting local facilities, building on earlier paragraph 7.9 and reflecting the comments we submitted at the previous stage. We also welcome that paragraph 12.80 makes clear it covers theatres; the Newbury Corn Exchange, New Era and Watermill are examples of valued theatre facilities in the district.</p>	<p>Comments noted.</p> <p>The Emerging Draft LPR policy and supporting text is to be amended to clarify that the policy relates to local community facilities, including cultural buildings. Larger cultural facilities will be covered under the Town Centres</p>

Respondent (with lpr ref)	Response	Council Response
		policy as these are a main town centre use in accordance with the NPPF.
<b>Other stakeholders</b>		
Councillor Alan Macro (lpr769)	<p>Policy is not supported.</p> <p>The policy should be split into two: one for local and farm shops and one for provision of community facilities. The threshold of 1,500 homes is too high and facilities other than shops should be required.</p> <p>Developments of 800+ homes should be required to provide a convenience store (i.e. one stocking food and household essentials). Developments of 1,500+ homes should be required to provide community facilities, such as a meeting hall.</p> <p>Changes to be made/preferred approach: The policy should be split into two: one for local and farm shops and one for provision of community facilities.</p> <p>Developments of 800+ homes should be required to provide a convenience store (i.e. one stocking food and household essentials). Developments of 1,500+ homes should be required to provide community facilities, such as a meeting hall.</p>	<p>Comments noted.</p> <p>Strategic sites within the LPR have a site specific policy which sets out the detail in relation to the infrastructure provision for the site. In this case, see Council's full response to comments under Emerging Draft LPR Policy SP16 and Policy SP17.</p> <p>Emerging Draft LPR Policy DC39 to be amended to remove the second paragraph of the policy as it is considered sites of this size should be comprehensively masterplanned and include the necessary infrastructure to meet the needs of the proposed development.</p> <p>The provision and retention of local community facilities is essential to the creation of sustainable communities. The Emerging Draft LPR policy and supporting text will be amended to clearly outline the uses to be considered under this policy.</p> <p>Proposals for farm shops will now be considered under a new Farm Diversification policy – Proposed Submission LPR Policy DM36.</p>
Councillor Tony Vickers (lpr669)	<p>Policy is not supported.</p> <p>We wish to split this policy into two and strengthen the “community facilities” part.</p>	<p>Comments noted.</p> <p>Strategic sites within the LPR have a site specific policy which sets out the detail in relation to the infrastructure provision for the site. In this case, see Council's full response to comments under Emerging Draft LPR Policy SP16 and Policy SP17.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>The threshold of 1500 homes for provision of a local shop is already too high and in a post-Covid, Climate Emergency age needs to be much lower. There are three different functions here, which need to be separated out.</p> <ol style="list-style-type: none"> <li><b>Farm shops</b> should be seen mainly as supporting rural enterprises, as adjuncts to local food producers but also inescapably drawing customers, perhaps as tourists or local employees, from beyond the area from which the 'farm' draws its supplies.</li> <li><b>Local shops</b> are needed in larger residential estates to enable local people who neither possess cars nor have access to the internet to meet their essential daily shopping needs. Where possible, local policies – including shopping – as well as national policies should encourage reduction in “food miles” and result in more local produce being sold in these local shops. However they should be seen as much as community facilities and for general retail as for food retail.</li> <li><b>Climate Emergency</b> should lead us to take proactive planning policy measures to facilitate the “15-minute neighbourhood” concept in all settlements for all residents, which logically would lead to larger more comprehensive local community “hubs”. All daily material and social needs of residents should be capable of being met without use of a private car within a 15-minute journey. These Local Centres should also be able to fulfil a business support function for home-workers in the future flexible economy.</li> </ol> <p>It may be possible and will generally be desirable to use existing facilities to serve one or more of these needs but if not then a major housing developer should be required to provide serviced land and perhaps also buildings to help meet demonstrable needs of the development.</p> <p>Changes to be made/preferred approach: The policy should be reviewed in this context. We believe developments of 800+ homes should be required to provide for a convenience store (i.e. one stocking food and household essentials). Developments of 1,200+ homes should be required to provide for services community facilities, such as a meeting hall.</p>	<p>Emerging Draft LPR Policy DC39 to be amended to remove the second paragraph of the policy as it is considered sites of this size should be comprehensively masterplanned and include the necessary infrastructure to meet the needs of the proposed development.</p> <p>The provision and retention of local community facilities is essential to the creation of sustainable communities. The Emerging Draft LPR policy and supporting text will be amended to clearly outline the uses to be considered under this policy.</p> <p>Proposals for farm shops will now be considered under a new Farm Diversification policy – Proposed Submission LPR Policy DM36.</p>
<b>Landowners, site promoters and developers</b>		

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
Onnalee Cubitt (lpr2193)	Both Sovereign and the landowners [of site ref: KIN6] support the recognition within supporting paragraph 12.74 that Kintbury is a large settlement within the rural area and therefore is one that is capable of accommodating growth.	Comments noted.
Fowler Architecture (lpr1812)	<p>Clarification is required to confirm that Policy DC39 concerns the change of use of facilities in settlements, whereas Policy DC23 will also apply to proposals in the countryside, outside of settlements.</p> <p>The requirement for a 'local needs assessment' under (c)(i) should be clarified under the supporting text, including what is meant by easily accessible and what should form part of a local needs assessment.</p> <p>What is meant by a 'reduced realistic and active marketing exercise' under (c)(ii)? Paragraph 12.78 requires a 6-month period in all cases and does not infer any reduced exercise.</p> <p>Paragraph 12.78 final paragraph is confusing and should be amended to not discourage marketing from continuing following the submission of the planning application. Amend to 'The period of marketing should not end before the date of the planning application being submitted'.</p>	<p>Comments noted.</p> <p>Emerging Draft Policy DC23 relates to the conversion and/or re-use of existing redundant and disused buildings in the countryside for residential use. This policy (Emerging Draft LPR Policy DC39) relates to the provision and retention of local community facilities across the District. Policies within the LPR need to be read as a whole.</p> <p>Emerging Draft LPR Policy DC39 and supporting text to be amended to reflect more clearly the policy requirements.</p> <p>Supporting text will be amended to state that the minimum 6 months marketing period should be prior to the planning application being submitted.</p>
Savills on behalf of Englefield Estate (lpr1544)	The NPPF is clear that planning policies 'should identify opportunities for villages to grow and thrive' (paragraph 78) and should enable the development of accessible local services and community facilities such as local shops (paragraph 83d). The overall presumption in favour of local shops and farm shops in draft LPR Policy DC39 therefore reflects the provisions of the NPPF and is supported.	Comments noted.
Sovereign Housing (lpr2189)	Both Sovereign and the landowners [of site ref: KIN6] support the recognition within supporting paragraph 12.74 that Kintbury is a large settlement within the rural area and therefore is one that is capable of accommodating growth.	Comments noted.

### Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

**Emerging Draft LPR reference: Appendix 1 Monitoring and Delivery**

**(Proposed Submission LPR reference: Appendix 1 Monitoring and Delivery)**

Number of responses received: 2

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr266)	We note with disappointment that this appendix has not been provided.	Comment noted. The appendix will be included in the Proposed Submission LPR.
<b>General consultation bodies</b>		
None		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr670)	We needed to see some indication of how the Plan will be monitored and delivered at this stage.	Comment noted. The appendix will be included in the Proposed Submission LPR.
<b>Landowners, site promoters and developers</b>		
None		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Appendix 2 – Evolution of the LPR

Number of responses received: 2

Respondent	Response	Council Response
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr191)	We note with disappointment that this appendice have not been provided.	Comment noted. Paragraph 1.25 of the Emerging Draft LPR noted that there were still aspects of the LPR which needed further work. Paragraph 2.1 also noted that the completed appendix would be included in the Draft version of the LPR. However, the information that would be included in this appendix is currently already covered in the Introduction to the LPR. Therefore, in order to avoid unnecessary duplication 'Appendix 2 Evolution of the LPR' will not be included in the Proposed Submission LPR.
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr671)	We are disappointed that this Appendix is blank. Surely some indication of how the Plan will be maintained and evolve would have been possible?	Comment noted. Paragraph 1.25 of the Emerging Draft LPR noted that there were still aspects of the LPR which needed further work. Paragraph 2.1 also noted that the completed appendix would be included in the Draft version of the LPR. However, the information that would be included in this appendix is currently already covered in the

Respondent	Response	Council Response
		<p>Introduction to the LPR. Therefore, in order to avoid unnecessary duplication 'Appendix 2 Evolution of the LPR' will not be included in the Proposed Submission LPR. Monitoring and Delivery will be covered by Appendix 1.</p>

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Appendix 3: Settlement Boundary Review

### (Proposed Submission LPR reference: Appendix 2: Settlement Boundary Review)

Number of responses received: 37

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr786)	Support. My analysis of historic village scores defined in the Historic Landscape Characterisation project, current Conservation Areas and existing Settlement Boundaries indicates that it would be useful to review the boundaries with the historic and architectural interest in mind. Several villages or hamlets outside the AONB have no Conservation Areas or Settlement Boundaries - eg Beech Hill, Ufton Nervet and Wasing.	Comments noted
<b>Statutory consultees</b>		
Hermitage Parish Council (lpr1813)	HPC agrees that settlement boundaries should be led by a landscape led approach. It believes that settlement boundaries should not be elastic merely to allow proposed developments to go ahead. The boundary was pushed outwards in the current DPD to accommodate HSA 24 and 25 (RSA 29 and 30). Specifically, current draft proposals for Hermitage imply that a boundary extension will be needed solely for WBC to ratify site allocations within the Emerging Plan. HPC therefore feels that this proposed expansion of Hermitage settlement boundary is being presented as inevitable. However, HPC strongly objects to this approach. This extended envelope would cover a significant area, presenting a substantial risk of further extension uphill to Slanting Hill thus enabling	Comments noted. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded. This makes clear that sites allocated through the LPR will be included within the boundary. Such sites are only allocated after a thorough site assessment.  The work has been undertaken in co-operation with parish/town councils and neighbourhood planning groups. The Council gave all town/parish councils and neighbourhood planning groups across the District an



Respondent (with lpr ref)	Response	Council Response
	<p>a concentration of dwellings, possibly on a scale similar to the existing Forest Edge development at the North end of Hermitage. The Parish Council is strongly against any such developments.</p> <p>HPC firmly believes that any extension of current Hermitage settlement boundary would not sensibly fit with its position within the North Wessex Downs AONB. No expansion of the settlement boundary should be agreed by WBC which removes a significant chunk of green space within the defined AONB.</p> <p>HPC would ask WBC to also be mindful of recent extensive surface water flooding of fields within Hermitage and to take account of evidence of speeding traffic through the village and frequent incidences of traffic congestion, when any proposal to extend the existing settlement boundary should be raised.</p>	<p>opportunity to undertake an initial review of boundaries in February and March 2020. As far as possible the results from this exercise were used as a clear community steer for the way forward. This information was then considered together with the requests that were submitted by residents and other developers for small extensions to boundaries in some settlements. Proposed new boundaries were then drawn up. Town/parish councils and neighbourhood planning groups across the District were also given another opportunity to comment in March and April 2021 and boundaries amended as appropriate.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Hungerford Town Council (lpr175)	Hungerford Town Council has already provided their input (Feb 2020) on adjustments to the settlement boundary. See also comments re RSA21.	Comments noted
Lambourn Neighbourhood Development Plan Steering Group (lpr1715)	<p>The area designated in the emerging Lambourn Neighbourhood Development Plan includes two settlements with settlement boundaries - Lambourn and Eastbury. Decisions about the Lambourn Settlement boundary have yet to be taken and the boundary of the Lambourn urban area shown in the Landscape Character Appraisal for the Lambourn NDP should not be seen as a proposed settlement boundary. When the Settlement Character Appraisal for Lambourn is completed, the Steering Group will then be in a position to clarify this. Some residents of Eastbury have expressed dissatisfaction with the current settlement boundary, but the debate about where the boundary should go is ongoing, based on the criteria set out in the LPR. Upper Lambourn does not have a settlement boundary but in the light of recent developments there is an ongoing debate about the need for one.</p>	<p>Comments noted. The Council acknowledges that when these comments were made the settlement boundaries for settlements within the parish of Lambourn were going to be revised as appropriate through the Lambourn Neighbourhood Development Plan using the criteria set out in the LPR.</p> <p>In August 2021 the NDP Steering Group asked the Council to incorporate the work it had done separately already for Eastbury, Lambourn and Upper Lambourn into the overall settlement boundary review for the District. Further details are set out in Appendix 3 of the SBR itself. Proposed new boundaries for Lambourn and Eastbury will be set out in the Proposed Submission LPR.</p>

Respondent (with lpr ref)	Response	Council Response
Purley on Thames Parish Council (lpr1852)	We are pleased to note that there are no proposals to extend the settlement boundary further into the green area between Purley on Thames and Pangbourne.	Comments noted
Shaw cum Donnington (lpr268)	We have commented on this in a previous consultation.	Comments noted
Stratfield Mortimer Parish Council (lpr447)	Supports the approach	Comments noted
Thatcham Town Council (lpr1419)	<p><i>Full representation relating to north east Thatcham strategic site allocation attached to representation on SP17.</i></p> <ul style="list-style-type: none"> <li>"We are also undertaking a detailed 'on the ground' community led assessment of each individual settlement. This work is being undertaken in co-operation with parish and town councils and neighbourhood planning groups and is still in progress."</li> </ul> <p>We are unclear as to the consultation process that has been undertaken with Thatcham Town Council and request that guidance is provided to the Town Council on the community led assessment that this is referring to.</p> <ul style="list-style-type: none"> <li>"The Council will take a landscape led approach."</li> </ul> <p>We note that the landscape for NE Thatcham is recognised by West Berkshire Council in their submission to the Secretary of State as being countryside, and not urban fringe.</p> <ul style="list-style-type: none"> <li>Principle include that "settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside."</li> </ul> <p>We note that the existing settlement boundary on the North side of Thatcham was defined to prevent unrestricted growth and the proposed extension is in conflict with existing boundaries.</p> <ul style="list-style-type: none"> <li>Boundaries will exclude "Recreational or amenity open space which extends into the countryside."</li> </ul> <p>We note that the NE Thatcham proposed site would require the settlement boundary to extend into the countryside and is in conflict with this definition.</p> <ul style="list-style-type: none"> <li>Boundaries will exclude "Highly visible areas such as exposed ridges, land forms or open slopes; Open undeveloped parcels of land;</li> </ul>	<p>Comments noted.</p> <p>The work on the SBR has been undertaken in co-operation with parish/town councils and neighbourhood planning groups. The Council gave all town/parish councils and neighbourhood planning groups across the District an opportunity to undertake an initial review of boundaries in February and March 2020. As far as possible the results from this exercise were used as a clear community steer for the way forward. This information was then considered together with the requests that were submitted by residents and other developers for small extensions to boundaries in some settlements. Proposed new boundaries were then drawn up. Town/parish councils and neighbourhood planning groups across the District were also given another opportunity to comment in March and April 2021 and boundaries amended as appropriate.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Recreational or amenity open space which extends into the countryside; Tree belts, woodland areas"</p> <p>These are all examples of excluded boundaries that a NE Thatcham development would be in conflict with.</p> <p>The concepts that boundaries can be arbitrarily drawn to include sites that are allocated in the Local Plan is in conflict with Policy SP 1 that states that "environmental assets will continue to be protected and enhanced and used positively in development to establish a sense of place that nurtures human health and well-being". Essentially the redrawing of a settlement boundary to meet a housing need is a self-fulfilling prophesy that enables West Berkshire Council to justify placing housing where it wishes, and not where it does not wish, without any objective evidence base.</p> <p>It is necessary that:</p> <ul style="list-style-type: none"> <li>• The community led consultation process on settlement boundaries is explained to Thatcham Town Council</li> <li>• That the settlement boundary review is performed in a self-consistent way that respects the rules and principles that are defined in the review</li> <li>• The clear conflict between respecting the policy SP 1 and the extension of a settlement boundary that breaks this policy is resolved.</li> </ul>	<p>The Council has taken a landscape led approach to the drawing of settlement boundaries. There is a wealth of information already contained in landscape character assessments and community led documents such as town and village design statements, parish plans and neighbourhood plans which have been used as a guide. A detailed 'on the ground' community led assessment of each individual settlement has also been undertaken. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded. This makes clear that sites allocated through the LPR will be included within the boundary. Such sites are only allocated through the plan led process after a thorough site assessment and sustainability appraisal. For North East Thatcham the site assessment included a Landscape Sensitivity Assessment which is published as part of the evidence base for the LPR. There is therefore no conflict with Policy SP1.</p> <p>It is acknowledged that the settlement boundary is currently drawn around the whole of the proposed allocated site at North East Thatcham whilst Policy SP17 notes that development will be expected to deliver 'a network of green infrastructure which will include a new strategic country park linking Thatcham to the plateau and the AONB.' The Council is clear that development on the site will be landscape-led and has undertaken a Landscape Sensitivity and Capacity Assessment (LCA) which will provide the context within which any proposed development would need to conform. As a strategic level study the LCA assessed the site as a single tract of landscape and so whilst the study makes clear that there is a variability of landscape capacity within the site boundary and that this is a constraint that should inform design, it</p>

Respondent (with lpr ref)	Response	Council Response
		<p>does not assess the capacity of individual components of the site in relation to individual planning proposals. At this stage it is therefore not possible to draw the settlement boundary any tighter. As the LPR progress and more detailed work is done on the sensitivity and capacity of different parts of the site to accommodate development the boundary will be amended accordingly.</p> <p>The Proposed Submission LPR policy will set out that a landscape and visual impact assessment (LVIA) is undertaken for the site which will need to comply with the LCA. The LVIA will inform the final capacity, development, design and layout of the site.</p>
<b>General consultation bodies</b>		
Mid & West Berkshire Local Access Forum (lpr1893)	MWBLAF welcomes and supports the statement that: Boundaries will exclude ... Roads, tracks and public rights of way running along the edge of a settlement.	Comments noted
<b>Other stakeholders</b>		
Caroline Andrews (lpr1785)	I have never done this before however I wanted to put my views through before the deadline of the first phase in regards to the Settlement Boundary Review and the application that was originally put forward in July of 2012 for 4 Dwellings at the land Opposite Fairbanks between Cedar House, The Lythe and Rectory Cottages in Wickham, Newbury. The application was not approved back in 2014 due to the settlement being in an area of natural outstanding beauty, which is still very much the case. I believe another application has been put through after that, however I don't know the details of it. We moved to the area a few years ago, for simply the reason of living in a beautiful place that was not so built up and wouldn't like for any more properties being built so close to our property and I believe this view will be shared with most of my neighbours.	<p>Comments noted. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded.</p> <p>The work has been undertaken in co-operation with parish/town councils and neighbourhood planning groups.</p> <p>The land along Church Hill in Wickham is being promoted for inclusion within the settlement boundary by the landowner (see lpr1956). The Council believes that appropriate linear development along Church Hill would follow the existing pattern of development and does not consider that this would harm the form and character of the settlement as a whole. Whilst therefore appreciating the</p>

Respondent (with lpr ref)	Response	Council Response
		<p>views of some local residents and also the parish council who oppose its inclusion, on balance, the Council believes that this site could provide a suitable small scale infill opportunity.</p> <p>Although Wickham is within the AONB it is inevitable and appropriate that it will continue to change and develop but the Council is clear that change should be both appropriate and sustainable.</p>
Blandy & Blandy for Sir Christopher & Lady Gent (lpr2086)	<p>The Council will be aware of previous representations made to the Council in respect of land known as Land to the West of Wantage Road (“Site”). (Reference SCD2). Our Clients are pleased to see that the Council has not allocated SCD2 for residential development within the Local Plan. We understand that the reason for the exclusion of the Site is its location outside of the settlement hierarchy, rather than the site “not being developable within the next 15 years”. Our Client’s position remains that the site is not developable not only due to its location outside of the settlement area but also its proximity to Donnington Castle and further the existence of various restrictive covenants which our Clients would seek to enforce. Our Clients understand that the Council is still working on an updated Policies Map and that it is still finalising the settlement boundaries. The Emerging Local Plan places Donnington under the spatial area of Newbury and Thatcham. According to Emerging Policy SP1 “the focus of development in each spatial area will follow the District-wide settlement hierarchy” as set out in Emerging Policy SP3. Emerging Policy SP1 provides that “outside of settlement boundaries land will be treated as open countryside where development will be more restricted”. There is further guidance on criteria developments on the edge of defined settlements would need to meet, such as density expectations. Emerging Policy SP3 sets out the settlement hierarchy and Donnington is not included within either the Urban Area, Rural Service Centres or Service Villages. This Emerging Policy SP3 confirms instead that where development is proposed outside of the smaller settlements (here Donnington), development will be restricted to that which is appropriate for</p>	Comments noted

Respondent (with lpr ref)	Response	Council Response
	<p>rural countryside as set out in Emerging Policy DC1. This position is supported by our Clients.</p> <p>The Council's Existing Core Strategy locates the Site outside of the defined settlement boundary of Donnington. It is submitted that for the reasons set out above and in previous correspondence that should the Council reconsider the drawing of the settlement boundary for Donnington that it is not extended to include the Site.</p>	
Councillor Alan Law (lpr1079)	<p>I am supportive of the proposed Landscape led review of Settlement Boundaries and the referencing to Parish Plans, Village design statements, Conservation area appraisals, AONB landscape character assessments, and other Landscape and Historical assessments.</p> <p>I particularly support the exclusion of "Areas of isolated development which are physically or visually detached from the settlement", "Large gardens which visually relate to the open countryside rather than the settlement", "Loose knit arrangements of buildings on the edge of settlements", and "Roads, Tracks and Public rights of way running along the edge of the settlement".</p> <p>As far as Streatley and Upper Basildon are concerned, the desire to retain the current Settlement Boundary is very strongly supported by the residents and the two parish councils. With Streatley, this is the overwhelming desire of 80% plus of residents as reflected in the adopted Parish Plan 2006 and its adopted refresh in 2016.</p> <p>In Streatley, a couple of local land owners have lobbied for extensions of the SB, but these are solely motivated by a desire for personal profit by incorporating</p> <ul style="list-style-type: none"> <li>• their field (already rejected as an unsuitable development site following the initial review of the call for sites), or</li> <li>• their house and back garden, to enable a new back garden development in what is currently a location well outside the SB.</li> </ul> <p>These two presentations have been totally rejected as unsuitable by the Parish Council.</p>	Comments noted
Ian Parsons (lpr847)	<p>In rural and semi-rural areas there are spaces outside of existing settlement boundaries that are viewed as potential development sites by their owners.</p>	<p>Comments noted. The Council has taken a landscape led approach to the drawing of settlement boundaries. There is a wealth of information already contained in landscape</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Any review of settlement boundaries should respect the current use of such spaces - as paddocks, orchards, etc.</p> <p>Any redrawing of settlement boundaries should follow existing patterns, eg where no housing exists behind the current housing there should be no potential created for a second line of housing.</p>	<p>character assessments and community led documents such as town and village design statements, parish plans and neighbourhood plans which have been used as a guide. A detailed 'on the ground' community led assessment of each individual settlement has also been undertaken. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded.</p> <p>The work has been undertaken in co-operation with parish/town councils and neighbourhood planning groups. The Council gave all town/parish councils and neighbourhood planning groups across the District an opportunity to undertake an initial review of boundaries in February and March 2020. As far as possible the results from this exercise were used as a clear community steer for the way forward. This information was then considered together with the requests that were submitted by residents and other developers for small extensions to boundaries in some settlements. Proposed new boundaries were then drawn up. Town/parish councils and neighbourhood planning groups across the District were also given another opportunity to comment in March and April 2021 and boundaries amended as appropriate.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Charlotte Turner (lpr1896)	I note these are to be reviewed, regarding the Settlement Boundary for Streatley I do not see any way this can be enlarged from the existing position. The land to the east of the A329 that is not developed comprises:	Comments noted. The Council has taken a landscape led approach to the drawing of settlement boundaries. There is a wealth of information already contained in landscape character assessments and community led documents

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	<ul style="list-style-type: none"> <li>- The Heart of Streatley Charitable Trust Meadows, a conservation and informal recreation area,</li> <li>- The Recreation Ground and Allotments, both very well used,</li> <li>- Land within Flood Zone 3B, the Functional Flood Plain, where no further development is permitted,</li> </ul> <p>The land to the west of the A329 and the A417 comprises the Chalk Downlands of Lardon Chase, Lough Down and the Holies, most of which is owned by the National Trust and also a Site of Special Scientific Interest. In addition Streatley is within the North Wessex Downs Area of Outstanding Natural Beauty where there is a legal requirement to conserve and enhance the area.</p>	<p>such as town and village design statements, parish plans and neighbourhood plans which have been used as a guide. A detailed 'on the ground' community led assessment of each individual settlement has also been undertaken. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded.</p> <p>The work has been undertaken in co-operation with parish/town councils and neighbourhood planning groups. The Council gave all town/parish councils and neighbourhood planning groups across the District an opportunity to undertake an initial review of boundaries in February and March 2020. As far as possible the results from this exercise were used as a clear community steer for the way forward. This information was then considered together with the requests that were submitted by residents and other developers for small extensions to boundaries in some settlements. Proposed new boundaries were then drawn up. Town/parish councils and neighbourhood planning groups across the District were also given another opportunity to comment in March and April 2021 and boundaries amended as appropriate.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Councillor Tony Vickers (lpr672)	<p>We acknowledge that as the Plan evolves it will be necessary to review settlement boundaries. However we would like to also see the criteria for determining settlement boundaries reviewed at regular intervals.</p> <p>We would prefer to see settlement boundaries follow the <b>outer</b> line of roads that define the edge of a settlement than be drawn on the edge closest to</p>	<p>Comments noted. As noted in the SBR background paper, the Council's approach is to align boundaries along roads to the edge closest to the settlement. The Council sought comments on the proposed criteria for the settlement boundary review as part of the <a href="#">second round of Regulation</a></p>



Respondent (with lpr ref)	Response	Council Response
	the settlement, because it is essential to provide for all forms of settlement related travel within the road, which might require the full width of a boundary road to be modified.	<a href="#">18 consultation</a> we undertook between 9 November to 21 December 2018. From the comments we received it was clear that there was overwhelming support for the principle of the Council's landscape led approach to the drawing of settlement boundaries. Details are set out in the <a href="#">Consultation Statement (June 2019)</a> .
Peter West (lpr722)	<p>I object to any change in the Thatcham northern settlement boundary along Floral Way.</p> <p>Local residents have long appreciated the open fields to the north of Floral Way and the A4 as one of Thatcham's open spaces. The area is outside the current settlement boundary and I think most Thatcham residents want it to stay that way. As a resident of Simmons Field, the open views to the north beyond Floral way are a cherished reminder to me that I live on the edge of the countryside.</p> <p>One piece of land – the rising open slope visible when you drive north east up Harts Hill Road past 'The Mill' pub - appears to meet the exception criteria shown in Appendix 3:</p> <p>"Boundaries will exclude:</p> <ul style="list-style-type: none"> <li>• Highly visible areas such as exposed ridges, land forms or open slopes on the edge of settlements</li> <li>• Open undeveloped parcels of land on the edges of settlements which are not either functionally or physically or visually related to the existing built up area.</li> </ul>	Comments noted. See Council response to Thatcham Town Council (lpr1419 above)
<b>Landowners, site promoters and developers</b>		
Barton Willmore for Donfield Homes (lpr2101)	<p>We are in agreement with the Council's intention to review settlement boundaries.</p> <p>Our comments in relation to the Review of Settlement Boundaries relate specifically to Lower Basildon and should be read in the context of our promotion of our client's site "Land North of Reading Road, Lower Basildon". The site was identified as 'deliverable' under reference BAS1 within the West Berkshire Housing and Economic Land Availability Assessment ('HELAA') (February 2020).</p>	Comments noted. It is acknowledged that the SBR criteria state that boundaries will include 'single plot or other similar which would provide infill and rounding off opportunities small scale development opportunities that are physically, functioning and visually related to the existing built up area, taking account of any environmental development constraints.' A site for approximately 9 dwellings in this particular location is not considered to fulfil this criterion.

Respondent (with lpr ref)	Response	Council Response
	<p>The Site is situated off Reading Road (A329) and is south-west of the railway line. The area of the site proposed for inclusion within the settlement boundary comprises approximately 0.55Ha of land and lies on the edge of the settlement boundary of Lower Basildon and would be a logical extension to the settlement.</p> <p>The site adjoins the north-western edge of the existing Lower Basildon settlement boundary. To the north east of the site is the railway line. The residential dwellings of Grey Kite House and Pelynt House are within the settlement and to the south-east of the site. To the north-west of the site are two existing residential dwellings which are currently beyond the settlement boundary; Lower Basildon View (approved for a change of use from a restaurant to residential use under planning application reference: 12/00881/FULD) and a former outbuilding associated with the dwelling which obtained permission for conversion to a separate residential dwelling under application reference: 17/03322/FULD. White Lodge, The White House, Swan Yard Farm, and number of semidetached houses (No.6 to 12 Reading Road) lie the opposite side of Reading Road, immediately to the south-west of the Site. As such, the site is surrounded by existing residential uses on three sides and “reads” as part of the linear settlement.</p> <p>Appendix 3 of the local plan states that as part of the review, boundaries will include small-scale development opportunities “which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built-up area, taking account of any environmental development constraints.” The alteration of the settlement boundary at Lower Basildon to include our client’s land which could accommodate approximately 9 dwellings would provide a rounding off opportunity for a more logical settlement boundary. The revised boundary which would reflect the existing residential uses to the north west of our client’s site introduced since the settlement boundaries were last updated. In relation to environmental development constraints, these representations are accompanied by technical documents including a Preliminary Ecology Appraisal (November 2020, prepared by John Wenman Consultancy), a Settings Appraisal (November 2020, prepared by Archway Heritage) and a Report on Landscape and Visual Matters (October 2020, prepared by David Williams Consultancy). These reports demonstrate that there are no</p>	<p>It is not the role of the SBR to allocate sites for development.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>environmental development constrains which would prevent the delivery of the site. In addition, we have considered technical constraints including archaeology (Initial Archaeology Study (November 2020), prepared by Archway Heritage) and highways (Highway Assessment (November 2020), prepared by Highway Planning Ltd.) which are also provided with these representations and evidence the deliverability of the site. An indicative site layout is also provided which illustrates how 9 dwellings could be accommodated on the site.</p> <p>We understand that in defining updated settlement boundaries, the Council are seeking to, where possible, follow clearly defined features such as hedgerows, railway lines or roads. Whilst there is a railway line to the rear our client's land which the Council may wish to consider as an appropriate boundary, we note that development within the settlement is typically closer to Reading Road and, as a result the Council should note that the extent of the land promoted (please refer to the site boundary plan reference 18752 01 submitted in response to the call for sites and again with this submission for ease of reference) suggests a north-eastern boundary in keeping with residential development to the north-west and south-east of the site. It is proposed that the area of land shown in blue on the Site Boundary Plan is retained undeveloped and put to a community use such as allotments or open space dependent on community need. In addition, it should be noted that landscape features to mark this boundary, by way of new hedgerow and tree planting, would be included with any landscape proposals for the development. The introduction of new hedgerow and tree planting would mitigate against landscape and visual impacts of small-scale residential development in this location by strengthening boundaries as well as providing screening which would limit views towards the proposed development. This suggested approach is consistent with the Council's approach to allocating Land at Chieveley Glebe, Chieveley under Policy RSA 26.</p> <p>In reviewing the settlement boundaries, we would encourage the Council to have regard to the Report on Landscape and Visual Matters prepared by David Williams Landscape Consultancy (dated October 2020) submitted with these representations which consider the landscape impacts of the development of this site within the AONB in detail. The report concludes that</p>	

Respondent (with lpr ref)	Response	Council Response
	the layout and design (scale, height and massing) of the development would reflect, and be keeping with, the existing pattern and grain of development within Lower Basildon and that the development would not result in significant landscape or visual impacts or effects.	
Bluestone Planning for Jeremy Flawn (lpr182)	<p>The decision to review the settlement boundaries in the District is to be welcomed. It is understood that a landscape-led approach is being adopted, but that it is being enhanced with community-led assessments of each individual settlement.</p> <p>The main criteria for drawing boundaries to include land are understood to be as follows. Boundaries will, in future, <u>include</u>:</p> <ul style="list-style-type: none"> <li>• The main settlement area. i.e. the area of close knit physical character</li> <li>• Sites allocated through the Local Plan and Neighbourhood Plan processes</li> <li>• Curtilages which are contained, are visually part of the built up area and are separated from the open or wider countryside</li> <li>• Recreational or amenity open space which is physically surrounded by the settlement (or adjoined on three sides by the settlement)</li> <li>• Existing community facilities (such as churches, schools and village halls) which are physically and visually related to the settlement</li> <li>• Single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development</li> </ul> <p>In contrast it is understood that the following will be <u>excluded</u> from settlement boundaries:</p> <ul style="list-style-type: none"> <li>• Highly visible areas such as exposed ridges, land forms or open slopes on the edge of settlements</li> <li>• Open undeveloped parcels of land on the edges of settlements which are not either functionally or physically or visually related to the existing built up area</li> <li>• Recreational or amenity open space which extends into the countryside or primarily relates to the countryside in form and nature. This includes designated Local Green Space</li> </ul>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary. It is not considered to form part of the main settlement area i.e. the area of close knit physical character.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• Tree belts, woodland areas, watercourses and other features which help to soften, screen existing development and form a boundary to the settlement</li> <li>• Areas of isolated development which are physically or visually detached from the settlement and areas of sporadic, dispersed or ribbon development</li> <li>• Large gardens or other areas, such as orchards, paddocks, allotments, cemeteries and churchyards, which visually relate to the open countryside rather than the settlement</li> <li>• The extended curtilages of dwellings where future development has the capacity to harm the structure, form and character of the settlement</li> <li>• Loose knit arrangements of buildings on the edge of a settlement</li> <li>• Farmsteads, agricultural buildings, or converted agricultural buildings on the edge of a settlement which relate more to the rural context</li> <li>• Horse related development, minerals extraction, landfill, water features, public utilities (sewage treatment plants, substations) on the edge of a settlement</li> <li>• Important gaps between developed areas in fragmented settlements. Settlement boundaries do not need to be continuous. It may be appropriate, given the nature and form of a settlement, to define two or more separate elements of it.</li> <li>• Roads, tracks and public rights of way running along the edge of a settlement</li> </ul> <p>Land at Vicarage Lane, Streatley (postcode RG8 9HX) represents a parcel of land containing three properties which, although outside the settlement boundary for Streatley as depicted on the adopted Local Plan proposals map, are logically part of the settlement and should be included following the boundary review of the settlement boundary for Streatley.</p> <p>The three properties have been described by name in the Village Design Statement for Streatley (2009) p.17 as lying <u>within</u> the settlement boundary. These properties are Waterford House (previously the Vicarage); the Old Vicarage; and Windrush.</p> <p>Under the heading “THE VILLAGE OF STREATLEY WITHIN THE SETTLEMENT BOUNDARY” the text on page 17 states:</p>	

Respondent (with lpr ref)	Response	Council Response
	<p><i>“Vicarage Lane lies opposite Church Lane and to the south of the High Street. A two-storey, 20th century house on the west side of Vicarage Lane occupies part of the originally extensive gardens of Streatley House.</i></p> <p>The proposed extension to the settlement boundary is attached as figure 1. The three properties and their associated curtilages clearly read as forming part of the physical settlement rather than lying outside the settlement. The Streatley Conservation Area Appraisal takes this further confirming in Appendix 7 that the three properties form part of the historic settlement or recent settlement growth (see Figure 2 attached) and that they form a part of the setting of – or are included within - the Conservation Area boundary for the Streatley Conservation Area (see extract from Appendix 8 in Figure 3 attached). Southfields to the south of Waterford House is significant because it does not form part of the continuum of built development on Vicarage Lane and is therefore not a logical part of the settlement. It is an outlier property which takes its access off the Reading Road and is remote, both physically and visually, from the Vicarage Lane properties.</p> <p><i>On the east side of Vicarage Lane is the attractive, riverside Millstream House. The Lane leads to a landmark building – the <u>19th century Vicarage, now a private house, with cream painted brickwork. The stables to that Vicarage have been converted into a two-storey family house. Adjacent to the “Old Vicarage” lies the 1960s vicarage. All these houses are in traditional style with brick walls and plain tile roofs. The windows vary in type, casement or vertical sash, and some frames are painted white whilst others are in natural hardwood finish.</u></i>” (the three properties in question are those underline above).</p> <p>Over the last 20 years Vicarage Lane has changed from a rural muddy track extending southwards out of the village of Streatley into a low density residential road with built development and village amenities along the length of the Lane.</p> <p>In particular the following changes have taken place:</p> <ul style="list-style-type: none"> <li>• The 1960s Vicarage was redeveloped in 2010 to create Waterford House, a modern well- appointed detached dwelling and grounds leading to the edge of the River Thames</li> <li>• Vicarage Lane was resurfaced in 2011 and is now well-used for vehicular traffic every day</li> </ul>	

Respondent (with lpr ref)	Response	Council Response
	<ul style="list-style-type: none"> <li>• In 2011 planning permission was granted for the construction of a manege and equestrian facilities on the west side of Vicarage Lane</li> <li>• In 2017 the Granary was demolished and a new dwelling was constructed on the eastern side of Vicarage Lane to the north of Windrush</li> <li>• The land immediately to the north of Windrush was acquired by the Parish Council for the benefit of the community in 2011</li> <li>• In 2015 Windrush was substantially extended to form an impressive family home</li> <li>• An impressive indoor swimming pool was built by Streatley House in their garden adjoining the Lane in 2020</li> </ul> <p>The Lane forms an integral part of the built area of the village of Streatley, and it is therefore entirely logical to include the three properties within an extension to the settlement boundary.</p> <p>The inclusion of these properties within the boundary will neither harm the setting of the Conservation Area nor the AONB, as the properties are already <i>in situ</i> and no change is proposed as part of this proposed boundary extension. The land clearly reads and is understood by the casual observer to form part of the settlement already. The environmental constraints that affect these three properties (ANOB, Conservation Area / trees / River Thames corridor etc) will serve to ensure that by including these properties within the settlement boundary there is no greater prospect of further development taking place that there is today. This satisfies the third objective for sustainable development in the NPPF – the environmental objective.</p>	
Carter Jonas for Mr & Mrs Steljes (lpr1939)	<p>We object to the Section 8 of the Local Plan as it does not allocate the land at Hillfield, Lower Basildon for residential development.</p> <p>Even though the settlement is one of the smaller ones in the District the boundary of the settlement is fixed which gives limited scope for future development.</p> <p>It is requested that the boundary of the settlement is extended to allow the development of the land to the north of the settlement boundary to be developed.</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary. A site for approximately 8 dwellings in this particular location is not considered to fulfil this criterion.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Once the settlement boundary is amended to include the land at Hillfield, it is requested that the site be allocated in the Local Plan for residential development. If the site is not allocated the amended settlement boundary would enable the site to come forward as infill in accordance with Policy SP1 and SP2.</p> <p>The site is in the North Wessex Downs AONB but adjacent to the built development of Lower Basildon to the south and two residential properties to the north and is located to the west of the busy A329. As such the development of the site will conserve and enhance the special landscape qualities of the AONB and not detract from it. The proposed development of 8 dwellings will not be major development and accordingly exceptional circumstances will not be required nor will the development need to be in the public interest to justify the development.</p> <p>The land is available, and the development of the site can be delivered within the next 5 years.</p> <p>The extend of the site that is requested to be included in the settlement is shown below (<i>plan attached</i>) identified as BAS2:</p> <p>The northern boundary of the settlement boundary for Lower Basildon is amended to include the site at Hillfield (BAS2).</p> <p>Allocate the site at Hillfield for residential development of up to 8 dwellings.</p>	<p>It is not the role of the SBR to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Carter Planning for RLA Jones (lpr1906)	<p>Objection.</p> <p>We do support a new boundary review but as proposed it will be ineffective and inadequate. Setting the parameters narrowing the review before carrying out the review is flawed. For instance existing allocated but undeveloped sites are automatically included in the settlement boundary whatever their landscape impact may be.</p> <p>The Plan's approach to the selection of sites prior to the review of settlement boundaries is flawed and not justified.</p> <p>In particular site RSA22 is a large extension to the settlement with no particular boundaries to the north and RSA23 can be described as a ribbon of development which is sporadic and not part of the close knit physical character of the village of Lambourn.</p> <p>RSA 23 has been selected and yet there is no landscaped boundary.</p>	<p>Comments noted. The Council has taken a landscape led approach to the drawing of settlement boundaries. There is a wealth of information already contained in landscape character assessments and community led documents such as town and village design statements, parish plans and neighbourhood plans which have been used as a guide. A detailed 'on the ground' community led assessment of each individual settlement has also been undertaken. The settlement boundary review criteria set out the general principles followed when defining a boundary and give guidance as to what would usually be included and what would usually be excluded. This makes clear that sites allocated through the LPR will be included within the boundary. Such sites are only allocated through the plan led process after a thorough site assessment and</p>



Respondent (with lpr ref)	Response	Council Response
	<p>The site is on a ridge, and an open area on the edge of the settlement seen at the entrance to the village.</p> <p>The Plan's review of settlement boundaries was previously poorly applied and that will continue if settlement boundaries are not comprehensively re-examined.</p> <p>It is nonsensical if an unallocated site which has little impact on the landscape can be examined but a previously allocated site which has not been developed and has undesirable landscape impacts is ignored.</p> <p>Sites RSA22 and 23 should be removed if not required, or one should be replaced by LAM007 or alternatively LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive" should be included in the settlement boundary alteration for Lambourn in addition to meet overall housing need. In particular RSA 23 compares unfavourably with LAM007. It is irregular in shape, has no natural containment and is further from the village centre. It is unable to provide the variety of mix and type of housing which can be delivered by LAM007 and is centred on the provision of low density high cost housing unsuited to the low cost housing required by the horse racing economy of Lambourn.</p> <p>Site LAM007 should be included in the Draft Plan.</p> <p>Carry out an unconstrained boundary review to include all sites on the edge of urban areas, especially around Lambourn, and not a limited review.</p>	<p>sustainability appraisal. For sites in Lambourn these assessments also included Landscape Sensitivity Assessments which are published as part of the evidence base for the LPR.</p> <p>It is not the role of the SBR to allocate sites for development.</p> <p>As part of the LPR the Council has undertaken a review of all of the existing settlement boundaries across the District.</p>
John Davies (lpr1821)	<p>I agree with your 'principles of inclusion of land uses', page 230 and your 'boundaries will include....' Pages 230 and 231. The present boundary of East Garston differs significantly from your clear and well identified criteria on pages 230 and 231. I submitted corrections to remove this anomaly to your HSADPD but was later informed that East Garston was too small to be reviewed.</p> <p>Review of East Garston's boundaries according to your criteria in the Emerging Draft</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of all of the existing settlement boundaries across the District, including East Garston.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>

Respondent (with lpr ref)	Response	Council Response
JSA Architects for Colthrop Village Consortium (lpr782)	<p>See Comments above about the Landscape Character Assessment and the Local Landscape Character Areas around Thatcham. The area 8D: South Thatcham Valley Farmland is quite extensive and not all of the area is of medium to high landscape sensitivity. The Rainsford Farm/former Paper Mill site is compromised by former industrial workings, electricity pylons, the edge of the colthrop industrial area, a large electricity sub-station and a railway line with overhead catenary which has only been installed since the study was undertaken. This part of the area is less tranquil and more intruded-upon by urban development and should therefore be seen as less sensitive.</p> <p>The landscape-led approach is valid to a point but other planning criteria, including the transportation benefits of proximity to the railway station should be weighed in the balance.</p> <p>Expressly acknowledge the planning balance and the sustainability benefits of proximity to Thatcham Railway Station and ensure that the criteria do not preclude development South of the railway and canal where there sustainability benefits from allowing development.</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary. It is not the role of the SBR to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Pro Vision for Feltham Properties (2279)	<p>The Consultation Document, at Appendix 3, confirms that as part of the Local Plan Review, the Council will review the settlement boundaries across the district.</p> <p>The Council's advises that settlement boundaries will include [inter alia]:</p> <ul style="list-style-type: none"> <li>• the main settlement area (i.e. the area of close-knit physical character); and</li> <li>• single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built-up area, taking account of any environmental development constraints.</li> </ul> <p>We support the intention to review existing settlement boundaries. In particular, we welcome the confirmation that single plots/small-scale sites that are well related to the existing built-up area will be included, or retained in the Plan, and encourage the Council to maximise these opportunities in conjunction with allocations as an important element of significantly boosting the supply of housing in accordance with the NPPF (paragraph 59).</p>	Comments noted

Respondent (with lpr ref)	Response	Council Response
Pro Vision for James D’Arcy (lpr1956)	Full representation promoting inclusion of Land at Wickham House within Wickham settlement boundary.	<p>Response noted. As part of the LPR the Council has undertaken a review of all of the existing settlement boundaries across the District, including Wickham. This site was considered as part of that process. The Council believes that this site meets the criteria for inclusion within the boundary.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Pro Vision for James Hastie (lpr1500)	The representation makes the case for inclusion of land to the south of Maidas Way, at the northern edge of Aldermaston, within the defined settlement boundary of Aldermaston.	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. The Council believes that this site meets the criteria for inclusion within the boundary.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Pro Vision for Mr & Mrs McIntosh (lpr1505)	Representation seeking inclusion of land at Three Gables, Great Shefford, within the Great Shefford settlement boundary attached.	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement</p>

Respondent (with lpr ref)	Response	Council Response
		Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.
Pro Vision for Sir Richard Sutton Ltd (lpr2082)	Representation makes the case for alignment of the settlement boundary to include HELAA site SPE3, allocation of SPE4, SPE5 and SPE6. Extension of settlement boundary to include promoted sites.	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and these sites were considered as part of that process. Whilst acknowledging the arguments put forward by the site promoter, the Council does not believe the sites meet the criteria for inclusion within the boundary. It is not the role of the SBR to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Pro Vision for Trustees of Allan Snook Will Trust (lpr1636)	Full representation seeking extension of the Boxford Settlement Boundary to the north of Laburnum Cottage, Westbrook, Boxford	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>

Respondent (with lpr ref)	Response	Council Response
Pro Vision for Trustees of Allan Snook Will Trust (lpr1919)	Full representation promoting land to the south of the Recreation Ground, Boxford and seeking extension of the settlement boundary. <i>(Also submitted under Policy SP12 (lpr1917))</i>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary. It is not the role of the SBR to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Pro Vision for Sir Richard Sutton Limited (lpr1281)	Representation attached relating to settlement boundary at Wash Common Farm. Agent is seeking inclusion of Wash Common Farm, where there is a planning permission for residential development, to be incorporated within the Newbury settlement boundary.	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Pro Vision for Wasing Estate (lpr2064)	<p>Re Land at Manor Farm, Brimpton (2 sites)</p> <p>In addition to housing site allocations, there also appears to be scope to extend the settlement boundary of Brimpton as part of the settlement boundary review.</p> <p>Appendix 3 of the draft LPR sets out the Council's intention to undertake this review. Settlement boundaries identify the main built-up area within which</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and these sites were considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe they meet the criteria for inclusion within the boundary.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>development is considered acceptable in principle. The LPR confirms that settlement boundaries will include characteristics such as:</p> <ul style="list-style-type: none"> <li>• The main settlement area i.e. the area of close knit physical character; and</li> <li>• Single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built-up area, taking account of any environmental development constraints.</li> </ul> <p>The current settlement boundary of Brimpton is drawn tightly around the majority of the built-up area, however there appears to be spaces which are not currently included within the boundary, but which clearly follow the existing settlement pattern. Both sites, as can be seen in the above map, are physically, functionally and visually well related to the existing built-up area, immediately adjoining the close-knit linear pattern of frontage development along Brimpton Road. The inclusion of these sites within a revised settlement boundary would represent logical rounding off opportunities to the settlement.</p> <p>We support the upcoming settlement boundary review, including at Brimpton, as this will encourage and enable the delivery of some small-scale development in the village. In addition to allocations, the delivery of small-scale sites will assist in meeting the Council's housing requirements over the Plan period, noting the important contribution small and medium sites can make as they are often built-out relatively quickly, as confirmed by the NPPF4.</p>	<p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Southern Planning Practice for The Saunders family (lpr1932)	<p><i>Extract of representation on behalf of the Saunders Family promoting development to the east of Stoney Lane</i></p> <p>We understand that the Local Plan Review is looking to review the existing settlement boundaries in the district through a landscape-led approach. Appendix 3 sets out how the council intend to do this.</p> <p>We agree that when reviewing the boundary for any given settlement, the council should look to its landscape evidence to assess which areas should be included and which should be excluded from the settlement boundary.</p> <p>We encourage the Council to review settlement boundaries to include suitable and sustainable sites for residential development and other development needs within the District. A previous settlement boundary review included the land at Coley Farm to facilitate its allocation.</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary. It is not the role of the SBR to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be</p>

Respondent (with lpr ref)	Response	Council Response
	<p>With regards to the land east of Stoney Lane, the site is not located in a sensitive landscape designation and it is very well related to existing and future development. It is therefore considered that the principle of its inclusion for residential development in the revised settlement boundary for Newbury is accepted. It is key to note that the southern section, including one of the sites accesses onto Waller Drive is located within the existing settlement boundary of Newbury.</p> <p>The revision to the settlement boundary to include land east of Stoney Lane would follow clearly defined boundaries and would result in a logical rounding of the urban area of Newbury. Whilst the site is currently countryside, it is very well located to the existing built up area of Newbury and is surrounded by existing and future residential development.</p>	<p>published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Southern Planning Practice for The Saunders family (lpr2120)	<p><i>Extract of representation on behalf of the Saunders Family promoting land at Coombe Bottom Farm, Streatley</i></p> <p>We understand that the Local Plan Review is looking to review the existing settlement boundaries in the district through a landscape-led approach. Appendix 3 sets out how the council intend to do this.</p> <p>We agree that when reviewing the boundary for any given settlement, the council should look to its landscape evidence to assess which areas should be included and which should be excluded from the settlement boundary. We encourage the Council to review settlement boundaries to include suitable and sustainable sites for residential development and other development needs within the District.</p> <p>With regards to the land at Coombe Bottom Farm, we believe that Streatley's existing settlement boundary should be amended to include this area of land. The Landscape and Visual Appraisal submitted with these representations demonstrate how the site is well related to the existing settlement and it is both physically and visually very well contained in the surrounding landscape, with only glimpse, filtered views are achievable. The existing settlement boundary for Streatley is considered to be mostly appropriate given its AONB location and the physical and environmental constraints around the settlement. However, the inclusion of the land at Coombe Bottom Farm, would represent a logical extension and a 'rounding' of the western built-up area of the settlement.</p> <p>As demonstrated throughout these representations, the site is an</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and this site was considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe the site meets the criteria for inclusion within the boundary. It is not the role of the SBR to allocate sites for development.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>appropriate location for new landscape-led residential development. Through the implementation of landscape-led development parameters and mitigation measures, development of the site would not result in an adverse impact on the AONB or any landscape designation. Such sites are very rare in the North Wessex Downs AONB and therefore this site should be considered carefully by the Council.</p> <p>Whilst at present, the site is not allocated through the Local Plan and nor is it allocated by a Neighbourhood Plan as Streatley does not have one, the inclusion of the site within the revised settlement boundary of Streatley would present a great opportunity for a suitable and sustainable new development which would provide new residential development and directly contribute to West Berkshire's Housing Land Supply in the North Wessex Downs AONB.</p>	
Turley for Richborough Estates (lpr2389)	<p><i>Full Representation promoting allocation of land north of Silchester Road, Tadley is set out under Policy SP14.</i></p> <p>It is noted that Tadley is only referred to once in the whole of the Draft Local Plan Review 2037, which is in Appendix 3 on page 229.</p> <p>As highlighted in the commentary above (<i>in reps on other policies and in full representation</i>), it is considered that Tadley has not received sufficient recognition within the Draft Local Plan. The suggested amendments to the text of policies SP1, SP3 and SP20 would improve the representation of Tadley within the Local Plan.</p>	<p>Response noted. The comments do not directly relate to the SBR and so have been considered elsewhere under other relevant policies.</p> <p>It is not the role of the SBR to allocate sites for development.</p>
Woolf Bond for Donnington New Homes (lpr2102)	<p>Without prejudice to our strong judgment that an allocation for a housing development opportunity should be identified at our client's site at Ashmore Green Farm, Stoney Lane we would consider that in order to take in an appropriate response to existing curtilages associated with existing properties, the Ashmore Green settlement boundary should be revised so to include the curtilage of Apple Tree Cottage and Ashmore Green Farmhouse. This settlement boundary amendment is indicated using a dashed red line (<i>shown in the plan in full representation</i>). The current settlement boundary (indicated using a black line) does not provide an accurate depiction of the situation on the ground and would therefore benefit from amendment.</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and these sites were considered as part of that process. The boundary has been drawn around the curtilage of Apple Tree Cottage but the Council does not believe Ashmore Green Farmhouse meets the criteria for inclusion. It does not form part of the main settlement area.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed</p>



Respondent (with lpr ref)	Response	Council Response
		Submission LPR. The settlements boundaries will also be shown on the Policies Map.
Woolf Bond for JPP Land (lpr2078)	<p>(Taken from cover letter, including map to suggest settlement boundary) Within appendix 3 of the Local Plan Review 2020-2037 document, the Council refers to a range of services and facilities which it considers potentially informs the sustainability of a location for growth. Whilst we acknowledge that proximity to facilities might be relevant, we nevertheless comment that the Council's assessment pre-judges the boundary of the settlement in making the appraisal.</p> <p>Furthermore, whilst Core Strategy policy CS1 committed the authority to review all settlement boundaries in the forthcoming Site Allocations and Delivery Local Plan, this did not include reconsideration of those for smaller villages. Therefore, in undertaking the review of settlement boundaries which would result in the inclusion of all allocations including that on land north of Bath Road, Woolhampton (consistent with the approach of the authority in the Site Allocations Local Plan), it should also reassess those boundaries for all places within the hierarchy.</p> <p>Taking account of the proposed allocation of the land north of Bath Road, Woolhampton for residential development, together with the draft approach outlined in appendix 3, we would advocate that the settlement boundary is revised as shown to include the land edged in red. This would result in the inclusion of both the land allocated north of Bath Road together with the car park associated with the Village Hall (as this is clearly related to an existing community facility as per the fourth bullet of the list of areas that the boundaries will include).</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of all of the existing settlement boundaries across the District, including Woolhampton. In accordance with the criteria the boundary has been drawn around the site proposed for allocation in the LPR. The boundary has not been revised to include the car park associated with the Village Hall however, because it does not meet the criteria for inclusion. The Council has taken into consideration the wider setting and important views into and out of the settlement.</p> <p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>
Woolf Bond for JPP Land and Spitfire Bespoke Properties (lpr2320)	<p>In our earlier representation on the Scope of the emerging Local Plan Review together with the November 2018 Regulation 18 Consultation, we highlighted an existing anomaly regarding the settlement boundary for Burghfield Common through its exclusion of the established residential developments off Roman Way and Saxon Gate. Whilst these developments were detached from Burghfield Common prior to the adoption of the Council's Housing Site Allocations Local Plan, through the allocation of land at Pondhouse Farm within this document for 100 dwellings (policy HSA15), they now adjoin the settlement.</p>	<p>Response noted. As part of the LPR the Council has undertaken a review of the existing settlement boundaries across the District and these sites were considered as part of that process. Whilst acknowledging the argument put forward by the site promoter, the Council does not believe they meet the criteria for inclusion within the boundary. Both developments are detached from the main settlement area.</p>

Respondent (with lpr ref)	Response	Council Response
	<p>Once Pondhouse Farm is developed, the established residential development off Roman Way and Saxon Gate will be both visually and physically integrated with the remainder of Burghfield Common. This will occur through the implementation of the approved application by Englefield Estate for up to 100 dwellings on Pondhouse Farm (LPA ref 18/02485/OUTMAJ).</p> <p>It is therefore essential that the Roman Way and Saxon Gate residential areas are included within the overall extent of Burghfield Common. This would be appropriate as it would consequently reflect the guidance in appendix 3 of the Draft Local Plan since it would be visually part of Burghfield Common following the development at Pondhouse Farm. Furthermore, it is noted that the Roman Way development is the largest extent of existing dwellings which is not within a settlement boundary – this anomaly should therefore be addressed. This representation details how this revision could be achieved.</p> <p>Alternatively, should the Roman Way development be retained outside of a settlement, it would nevertheless be appropriate to include Brook House Farm as an extension to Burghfield village. This is appropriate as reviews of the settlement boundaries of all the district's location must be undertaken as the Housing Site Allocations Local Plan did not undertake this, contrary to the obligation in the Core Strategy (Policy CS1).</p> <p>Whilst the draft criteria for excluding areas is outlined in the document, due to the need to identify sites for housing, the potential implications of these for inadvertently ruling out suitable sites should be critically examined. For example, whilst the last criterion listed for excluding a site relates to important gaps between developed areas, the need to retain such areas must be balanced against the wider benefits for sustainable development which may arise due to proximity of such places to facilities together with the clear need detailed above to identify further sites, together with at least 10% being delivered on sites of less than 1ha. The artificial rejection of sites logically forming part of a settlement will therefore hinder the ability of the authority to prepare a sound plan and accommodate the necessary growth to support each of the district's communities as envisaged in the revised NPPF.</p>	<p>Maps of individual settlements showing the finalised new settlement boundaries will be set out in a Settlement Boundary Review Background Paper which will be published as part of the evidence base for the Proposed Submission LPR. The settlements boundaries will also be shown on the Policies Map.</p>

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR reference: Appendix 4 – AWE Policy development category examples****(Proposed Submission LPR reference: Appendix 3 – AWE Land use planning consultation zones)**

Number of responses received: 2

<b>Respondent</b>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr269)	We are not competent to comment on this subject.	Comment noted.  The Appendix to be included in the Proposed Submission LPR will set out the land use planning consultation zones
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr673)	Supports the appendix	Support noted.  The Appendix to be included in the Proposed Submission LPR will set out the land use planning consultation zones

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR ref: Appendix 5: Critical Infrastructure Schedule of the Infrastructure Delivery Plan

Number of responses received: 6

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
N/A		
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr270)	We note with disappointment that this appendix has not been provided.	<p>Comments noted.</p> <p>Policy SP23 will be amended to delete the reference to 'critical' infrastructure as follows -            'The <u>key strategic and local</u> infrastructure schemes required to facilitate new development and secure the delivery of development within this plan <del>include, but are not limited to, those schemes set out within the Infrastructure Delivery Plan.</del> <u>will be linked to the phasing of new development. Phasing and specific infrastructure requirements are set out within the Infrastructure Delivery Plan (IDP). A schedule of the infrastructure which has been assessed as critical to the delivery of the Local Plan Review will be included within an appendix.'</u></p> <p>The appendix will therefore not be include in the Proposed Submission LPR.</p>
<b>General consultation bodies</b>		

Respondent (with lpr ref)	Response	Council Response
Canal & River Trust (lpr933)	Please ensure that the Canal & River Trust are given the opportunity to comment on an updated IDP.	Comments noted. Please see response to lp933
<b>Other stakeholders</b>		
Councillor Alan Marco (lpr770)	<p>This is a major omission!</p> <p>Many residents' concerns about new developments centre on the anticipated effect on infrastructure and services, such as highways and medical services. The omission of an infrastructure delivery plan means they cannot determine whether planned infrastructure will be adequate</p> <p>Changes: Critical infrastructure should include a new bypass connecting the A4 east of Thatcham with the A339 and A34 south of Newbury. This would relieve the A4 and A339 of traffic, and resulting pollution, both existing and from the proposed strategic housing site north east of Thatcham. It would also remove heavy goods vehicles from the A4 and A34 and the resulting noise, vibration and air pollution. It would also relieve pressure on the Station Road level crossing in Thatcham</p> <p>The infrastructure delivery plan should be developed and incorporated in the local plan which should then be consulted upon.</p>	Comments noted. Please see response to lp933
Councillor Tony Vickers (lpr674)	<p>We are very disappointed not to see more information about specific kinds of infrastructure and an indication of the main projects within the Plan at this stage.</p> <p>For example it should be clear that a development as large as Thatcham NE will need to come with major road infrastructure such as a new bridge over the main railway line east of the town and a road link to A339 and on to A34 bypass.</p> <p>Changes: Anything more than a blank!</p>	Comments noted. Please see response to lp933.
Alastair Jarman (lpr360)	You cannot comment on a policy element that has not been made available for comment. I am concerned as to what critical infrastructure will be in this delivery plan.	Comments noted. Please see response to lp933.

Respondent (with lpr ref)	Response	Council Response
	The IDP should be made available at the start of the process. It is not possible to comment on other elements of the Local Plan fully if you do not know what is in the critical infrastructure plan.	
Alastair Jarman (lpr631)	<p>There is no IDP here to support or object to at present, but I would make one observation.</p> <p>The Highways response of January 2021 indicates how difficult it has been to balance infrastructure to housing sites and housing numbers. These two paragraphs in particular seem to illustrate the dilemma and impact that is placed on highways in trying to deliver road infrastructure in Newbury.</p> <p><a href="http://planning.westberks.gov.uk/rpp/showimage.asp?j=18/00828/OUTMAJ&amp;index=1925146">http://planning.westberks.gov.uk/rpp/showimage.asp?j=18/00828/OUTMAJ&amp;index=1925146</a></p> <p>31. During the PM peak as what would be expected there is an increase in traffic congestion southbound on the A339 particularly the A339 / Fleming Road junction. Further impacts are found at the A339 / B3421 Kings Road / Bear Lane junction and at the Hambridge Road / Hambridge Lane Roundabout. <b>I am also concerned regarding the extensive traffic queue northbound on the A339 adjacent the Newtown Road Household Waste Recycling Centre.</b></p> <p>32. <b>I consider that the proposed junction is so extensive that it will be possible to hold traffic back for an appropriate time from overwhelming the more congested junctions to the north. The above mentioned proposed access onto the A339 to the north of the HWRC could also be used in this regard.</b></p> <p>I am concerned that highways are being required to find solutions to multiple sites, with insufficient influence over the housing numbers and by association traffic generation at each site at an early enough stage in the process. It appears to me that highways have in the past been expected to come up with solutions that are approaching insoluble.</p>	Comments noted. Please see response to lp933.
<b>Landowners, site promoters and developers</b>		
N/A		

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR: Appendix 6 Existing Designated Employment Areas****(Proposed Submission LPR: Appendix 4 Designated Employment Areas)**

Number of responses received: 4

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Statutory consultees</b>		
Shaw cum Donnington Parish Council (lpr271)	We note with disappointment that this appendice have not been provided.	Comments noted.  A list of existing Designated Employment Areas (DEAs) was provided as part of the Emerging Draft Regulation 18 Local Plan Review (LPR) (Appendix 6).
<b>Other stakeholders</b>		
Councillor Alan Macro (lpr771)	Appendix is not supported.  "Station Road and adjacent estates" is ambiguous.  "Station Road and adjacent estates" should be reworded: "Estates off Brunel Road and Station Road, Theale".	Comments noted.  Clarity with regard to the name of the DEA in question will be provided.  Emerging Draft LPR Appendix 6 to be updated to include new DEAs as listed in Policy SP21.
Councillor Tony Vickers (lpr675)	Appendix is supported.  This is a useful statement of fact. However we have a better suggestion for the name of "Station Road and adjacent estates", because there are several Station Roads in the District.  "Station Road and adjacent estates" should be reworded: "Estates off Brunel Road and Station Road, Theale"	Comments noted.  Clarity with regard to the name of the DEA in question will be provided.  Emerging Draft LPR Appendix 6 to be updated to include new DEAs as listed in Policy SP21.

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
Savills on behalf of Lambourn Business Park (lpr2107)	<p>Appendix is not supported.</p> <p>The estate was formerly known as Lowesdon Works but has since been rebranded. Accordingly the site is identified as a Designated Employment Area (Appendix 6) as Lowesdon Works and we would request that the Local Plan is updated to identify the site as Lambourn Business Park.</p>	<p>Comments noted.</p> <p>Clarity with regard to the name of the DEA in question will be provided.</p> <p>Emerging Draft LPR Appendix 6 to be updated to include new DEAs as listed in Policy SP21.</p>



## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR ref: Appendix 7 Residential Parking Zones

### (Proposed Submission LPR ref: Appendix 5 Residential Parking Zones)

Number of responses received:

Respondent (with lpr ref)	Response	Council Response
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
On behalf of Shaw-cum-Donnington Parish Council (lpr272)	We support the appendix	Support noted
<b>General consultation bodies</b>		
None		
<b>Other stakeholders</b>		
Councillor Tony Vickers (lpr676)	It would be useful to include here some guidance on what, in relation to new development, triggers a review of Residents Parking Zone extents.	Comment noted
<b>Landowners, site promoters and developers</b>		
None		

**Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)****Emerging Draft LPR ref: Appendix 8 How policies are applied in a neighbourhood Planning Context****(Proposed Submission LPR ref: Appendix 6 How policies are applied in a neighbourhood Planning Context)**

Number of responses received: 1

<b>Respondent</b> <i>(with lpr ref)</i>	<b>Response</b>	<b>Council Response</b>
<b>Internal</b>		
None		
<b>Statutory consultees</b>		
Shaw-Cum-Donnington Parish Council (lpr273)	We note with disappointment that this appendice have not been provided.	Comment noted. The Appendix will be included in the Proposed Submission LPR
<b>General consultation bodies</b>		
None		
<b>Other stakeholders</b>		
None		
<b>Landowners, site promoters and developers</b>		
None		

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Appendix 9 – Schedule of policies to be superseded/deleted

### (Proposed Submission LPR reference: Appendix 6 – Schedule of policies to be superseded/deleted)

Number of responses received: 4

Respondent	Response	Council Response
<b>Statutory consultees</b>		
Shaw-cum-Donnington Parish Council (lpr274)	We note the schedule.	Response noted.
<b>General consultation bodies</b>		
Canal & River Trust (lpr939)	<p>We are aware that the Council understands the benefits that the Kennet &amp; Avon canal brings to the area and we acknowledge your support and recognition of these benefits in policy documents. However, we ask that the council consider whether the multi-functional nature of the canal would be better served by a specific waterways related policy dealing more broadly with issues relating to moorings, liveaboards, good waterside design and recreation. The Canal &amp; River Trust would be happy to work with the Council on such a policy.</p> <p>Whilst the Kennet &amp; Avon Conservation Management plan still exists as a guidance document, the Trust has produced an e-planning toolkit which provides advice on the Waterway proofing of planning policies at local plan level. The Trust is also producing a new document titled 'Good Waterside Places' and this will be made available as soon as possible.</p> <p>The local plan should aim to help unlock the economic, environmental and social benefits offered by the waterways and to secure the long-term sustainability and use of waterways as assets for the communities through which they pass. In formulating a specific policy, there are several important waterway factors to be considered.</p> <ul style="list-style-type: none"> <li>• Canals and rivers have different characteristics and principal functions.</li> </ul>	<p>Comments noted.</p> <p>The issues raised are covered by a number of policies in the LPR and so the Council does not consider that a specific policy is needed.</p>

Respondent	Response	Council Response
	<ul style="list-style-type: none"> <li>• Waterways are multi-functional by nature.</li> <li>• Waterways are public assets accessible to local communities free of charge and usage is set to increase as local communities have discovered the value of local spaces during the pandemic. Some areas have noted 400% increases in usage.</li> <li>• waterways, towpaths and water spaces are a part of a wider network that crosses administrative boundaries and cannot be viewed in isolation. A common approach should be considered. Wiltshire council are also reviewing the own local plan. Should a joint policy be considered?</li> <li>• There are particular land use implications and locational requirements arising from the inherent constraint of inland waterways being ‘non-footloose’ assets.</li> <li>• Development and regeneration can impose burdens and liabilities upon the waterway infrastructure, facilities and environs.</li> <li>• There is a need to provide essential boat services and facilities to support the use of waterways for navigational purposes.</li> <li>• Waterways and towing paths are spaces in their own right, and not just settings or backdrops to development or edges to policy designations.</li> <li>• The proposals map should indicate waterways and their corridors and not just flood zones</li> <li>• The use of waterborne freight should be considered</li> <li>• Do the design and placemaking policies adequately cover the needs for good waterside design, such as encouraging new developments to: integrate land and water; open up access to, from and along the waterway; explore the added value and use of water space; and view the waterway, towpath and environs as part of the public realm.</li> <li>• Does the plan recognise that living afloat contributes towards increasing choice in housing types and lifestyle, and contributes to the life, vitality and natural surveillance of the waterway. Housing authorities must “consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored”.</li> </ul> <p>The Trust would welcome a meeting with the council before the next stage of the plan to ensure that all these matters are considered and to discuss whether a specific policy is justified.</p>	
<b>Other stakeholders</b>		

Respondent	Response	Council Response
Councillor Alan Macro (lpr772)	RL5 Kennet and Avon Canal superseded by SP18 Housing type and mix? Correct the table	Comment noted. Policy RL5 dealt with the provision of houseboat moorings which is now covered by policy SP18.
Councillor Tony Vickers (lpr677)	This is a very useful list but we have found one error. RL5 Kennet and Avon Canal superseded by SP18 Housing type and mix? Correct this mistake.	Comment noted. Policy RL5 dealt with the provision of houseboat moorings which is now covered by policy SP18.

## Responses received to the emerging draft of the Local Plan Review (consultation December 2020 – February 2021)

### Emerging Draft LPR reference: Appendix 10 – Glossary

### (Proposed Submission LPR reference: Appendix 8 – Glossary)

Number of responses received: 2

Respondent	Response	Council Response
<b>Internal</b>		
Archaeology Team West Berkshire Council (lpr702)	Yes a glossary is definitely needed for acronyms, specialist areas and the opportunity to provide hyperlinks I would also welcome an appendix which provides cross referencing of the 11 strategic objectives with the key policies, targets and actions - this could perhaps be included as part of Appendix 1? Something similar has been done by Milton Keynes.	Comments noted.  The Regulation 19 version of the LPR will include a glossary.  The comment in relation to Appendix 1 will be considered as part of the Council's response to comments made under that appendix.
<b>Statutory consultees</b>		
Shaw-cum- Donnington Parish Council (lpr191)	We note with disappointment that this appendice have not been provided.	Comments noted.  The Regulation 19 version of the LPR will include a glossary.